

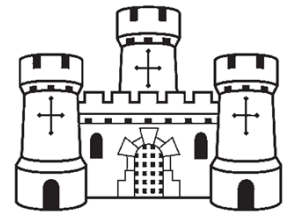
Public Document Pack

Date of meeting Thursday, 4th January, 2018

Time 6.00 pm

Venue Committee Room 1, Civic Offices, Merrial Street, Newcastle-under-Lyme, Staffordshire, ST5 2AG

Contact Geoff Durham



**NEWCASTLE
UNDER LYME**

BOROUGH COUNCIL

Civic Offices
Merrial Street
Newcastle-under-Lyme
Staffordshire
ST5 2AG

Cabinet

AGENDA

PART 1 – OPEN AGENDA

- 1 APOLOGIES**
- 2 DECLARATIONS OF INTEREST**
To receive declarations of interest from Members on items included in the agenda.
- 3 MINUTES** (Pages 5 - 8)
To consider the minutes of the previous meeting.
- 4 JOINT LOCAL PLAN PREFERRED OPTIONS** (Pages 9 - 400)
- 5 ECONOMIC DEVELOPMENT STRATEGY** (Pages 401 - 436)
- 6 SAFEGUARDING CHILDREN AND ADULTS AT RISK OF ABUSE OR NEGLECT - POLICY AND PROCEDURE** (Pages 437 - 492)
- 7 PROCUREMENT FOR ELECTIONS PRINTING SERVICE** (Pages 493 - 494)
- 8 POTENTIAL DISPOSAL OF BLACKFRIARS CAR PARK** (Pages 495 - 496)
- 9 URGENT BUSINESS**
To consider any business which is urgent within the meaning of Section 100B(4) of the Local Government Act 1972.
- 10 ATTENDANCE AT CABINET MEETINGS**

Councillor attendance at Cabinet meetings:

- (1) The Chair or spokesperson of the Council's scrutiny committees and the mover of any motion referred to Cabinet shall be entitled to attend any formal public meeting of Cabinet to speak.
- (2) Other persons including non-executive members of the Council may speak at such meetings with the permission of the Chair of the Cabinet.

Public attendance at Cabinet meetings:

- (1) If a member of the public wishes to ask a question(s) at a meeting of Cabinet, they should serve two clear days' notice in writing of any such question(s) to the appropriate committee officer.
- (2) The Council Leader as Chair of Cabinet is given the discretion to waive the above deadline and assess the permissibility of the question(s). The Chair's decision will be final.
- (3) The maximum limit is three public questions at any one Cabinet meeting.
- (4) A maximum limit of three minutes is provided for each person to ask an initial question or make an initial statement to the Cabinet.
- (5) Any questions deemed to be repetitious or vexatious will be disallowed at the discretion of the Chair.

Members: Councillors S Tagg, Holland, Johnson, Northcott, Sweeney and J Waring

PLEASE NOTE: The Council Chamber and Committee Room 1 are fitted with a loop system. In addition, there is a volume button on the base of the microphones. A portable loop system is available for all other rooms. Should you require this service, please contact Member Services during the afternoon prior to the meeting.

Members of the Council: If you identify any personal training/development requirements from any of the items included in this agenda or through issues raised during the meeting, please bring them to the attention of the Democratic Services Officer at the close of the meeting.

Meeting Quorums :- 16+= 5 Members; 10-15=4 Members; 5-9=3 Members; 5 or less = 2 Members.

FIELD_TITLE

Officers will be in attendance prior to the meeting for informal discussions on agenda items.

NOTE: THERE ARE NO FIRE DRILLS PLANNED FOR THIS EVENING SO IF THE FIRE ALARM DOES SOUND, PLEASE LEAVE THE BUILDING IMMEDIATELY FOLLOWING THE FIRE EXIT SIGNS. PLEASE **DO NOT** USE THE LIFTS.

COUNCIL CHAMBER: FIRE EXITS ARE AT THE REAR OF THE CHAMBER AT BOTH SIDES AND THIS IS THE SAME FOR OCCUPANTS OF THE PUBLIC GALLERY.

COMMITTEE ROOMS: EXIT VIA THE WAY YOU ARRIVED AT THE MEETING OR AT THE FAR END OF THE COUNCIL CHAMBER.

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CABINET

Wednesday, 8th November, 2017

Time of Commencement: 6.00 pm

Present:- Councillor Elizabeth Shenton – in the Chair

Councillors Beech, Kearon, Turner, J Williams and Robinson

Officers Executive Director (Resources and Support Services) - Kelvin Turner,
Executive Director (Operational Services) - David Adams, Executive Director (Regeneration and Development) - Neale Clifton, Chief Executive - John Sellgren and Jayne Briscoe - Scrutiny Officer

1. **APOLOGIES**

An apology was received from Councillor Rout.

2. **DECLARATIONS OF INTEREST**

There were no declarations of interest stated.

3. **MINUTES**

Resolved: That the minutes of the meeting held on 18 October 2017 be agreed as a correct record.

(Members of the public were in attendance at the meeting in connection with the reports on Planning for Homes Consultation Document and Delegation for Neighbourhood Planning shown at items 6 and 7 on the agenda and it was agreed that the order of the agenda be changed to allow for these items to be brought forward and considered first.)

4. **FINANCIAL AND PERFORMANCE MANAGEMENT REPORT TO END OF QUARTER TWO**

A report was submitted to Cabinet which provided members with performance data set within a financial report to describe how the Council had performed during the second quarter of 2017/18.

The Portfolio Holder for Finance, IT and Customer stated that wherever there were areas of underperformance an action plan to address the matter would be completed.

- Resolved**
- (i) That members note the contents of the attached report and agrees to the recommendation that the Council continues to monitor performance alongside the latest financial information for the same period.
 - (ii) That members note and agree the changes to Appendix B – Performance.

5. **FUTURE DELIVERY OF DISABLED FACILITIES GRANTS**

This report provided details of a proposed scheme to support independent living across Staffordshire which will include the delivery of Disabled Facilities Grants. It also seeks approval to participate in the county wide procurement and appointment of an appropriate provider.

- Resolved:**
- (i) That Cabinet approve the participation of the Council in the procurement of a new service to support independent living including the delivery of Disabled Facilities Grants in the Borough for the contract term referred to in the report unless otherwise agreed in consultation with the Portfolio Holder.
 - (ii) That following a competitive tendering process administered by Staffordshire County Council the Executive Director for Regeneration and Development in conjunction with the Portfolio Holder for Housing and Planning be authorised to agree the appointment of a contractor to deliver a service or to withdraw the Council from the process (reporting back to Members as appropriate in the event of any significant resourcing or service delivery issues arising from the latter).
 - (iii) That officers be authorised to sign, if appropriate, a Partnership Agreement and a funding agreement with Staffordshire County Council and to take all the necessary and associated steps to facilitate delivery of the new service.

6. **UPDATE ON ASSET MANAGEMENT STRATEGY AND DELIVERY PLAN**

A report was submitted to Cabinet which updated members on progress with delivery of the Approved Asset Management Strategy (AMS) and to approve the disposal of additional sites subject to consultation, these sites are not required to meet Open Spaces and Green Infrastructure purposes in accordance with the current Strategy.

The Portfolio Holder for Finance, IT and Customer referred to the financial challenges which faced Local Government and which had resulted in the need to examine all areas of Council for assets to fund future programmes of investment. Whilst significant progress had been made with securing receipts from land and property disposals, with the Council receiving approximately £4m over the last three years with the future potential for a further £575k, Village Green applications were outstanding in respect of six parcels of Council-owned land awaiting consideration by

the County Council which created uncertainty from a strategic asset management perspective.

- Resolved:**
- (i) That Cabinet approves the updated Asset Management Strategy and Delivery Plan and agrees in principle to the disposal of the sites set out in Appendix 1, subject to the relevant consultations being carried out and the outcomes being reported back to Cabinet.
 - (ii) That officers take the appropriate steps to protect the Councils interests in respect of all its land.
 - (iii) That officers be authorised to take appropriate steps to achieve the principle of residential development of the subject sites prior to any disposal.
 - (iv) That the Leader of the Council writes to the relevant Government Minister or Department to highlight the issues caused by undetermined applications for Village Green status and urging further legislative changes and/or guidance to achieve a better balance between the interests of land owners and other interested parties. A copy of this letter to be sent to the 4 MPs serving the Borough asking them to raise this issue in Parliament.

7. PLANNING FOR HOMES CONSULTATION DOCUMENT

A report was submitted which provided Cabinet with the opportunity to respond to the Governments Consultation 'Planning the right homes in the right places'

- Resolved**
- (i) That the Portfolio Holder for Planning and Housing be authorised to agree the final consultation response with officers based upon the proforma attached at Appendix 1 and taking account of the additional representations received.

8. DELEGATION FOR NEIGHBOURHOOD PLANNING

A report was submitted to Cabinet to approve delegated decision making arrangements for Neighbourhood Planning to allow the Council to meet statutory timescales.

The Portfolio Holder for Planning and Housing noted that this item was deferred because a number of members had raised concerns. Continuing, he explained that he had worked with officers to include an extra layer of consultation within the document to ensure that when a neighbourhood plan was submitted to the Borough Councils Planning Authority members of this council who represent a specific area

would be consulted for comments. This would allow for transparency and help to address any issues or concerns.

Resolved: (i) That all decisions (see Table 1) involving any aspect of the statutory function relating to Neighbourhood Planning be delegated to the Executive Director, Regeneration and Development in consultation with the Cabinet Member responsible for the Planning and Housing Portfolio unless:

- That stage of the Neighbourhood Planning process has resulted in significant public objection and/or the decision is likely to be significant in terms of its effect on communities living or working in an area comprising two or more wards.
- The decision is considered to be a Key Decision because it is likely to be significant in terms of its effect on communities living or working in an area comprising two or more wards.

Then such decision shall be delegated to the Cabinet Member responsible for the Planning and Housing Portfolio.

9. **URGENT BUSINESS**

There was no Urgent Business.

COUNCILLOR ELIZABETH SHENTON
Chair

Meeting concluded at 7.15 pm

NEWCASTLE-UNDER-LYME BOROUGH COUNCIL

EXECUTIVE MANAGEMENT TEAM REPORT TO THE CABINET

HEADING: Joint Local Plan Preferred Options Consultation Document

DATE: 4 January 2018

SUBMITTED BY: Regeneration and Development Directorate

PORTFOLIO: Planning and Regeneration

WARD(S) AFFECTED: All

Purpose of the Report

1. To advise Cabinet on the completion and outcome of the public consultation on the 'Strategic Options' stage of the Joint Local Plan.
2. To provide an update on the plan-making process for the Newcastle-under-Lyme and Stoke-on-Trent Joint Local Plan and to seek approval to go out to public consultation on the Preferred Options Consultation Document.
3. To seek approval for the public consultation exercise to be carried out between 1st February 2018 and 1 March 2018, and confirm that the consultation will be carried out in line with the adopted Statement of Community Involvement.

Recommendations

1. That Cabinet notes the responses to the consultation exercise carried out on the Strategic Options Consultation Document, as detailed in the Strategic Options Consultation and Responses Document (Supporting Document 1), and summarised in the draft Preferred Options Consultation document and that the said document be included on the Joint Local Plan page of the Council's website.
2. That, subject to any issues arising from the Planning Committee, Cabinet agree to the publication of the draft Preferred Options Consultation document (Appendix 1) for public consultation purposes, in line with the methods of consultation set out in the adopted Statement of Community Involvement (SCI).
3. That a report be submitted to a subsequent meeting of the Cabinet on the results of the Preferred Options public consultation exercise (target of September 2018), to inform the next stage of the plan preparation in partnership with Stoke-on-Trent City Council.
4. That Cabinet delegates to the Executive Director Regeneration and Development, in consultation with the Cabinet Member for Planning and Regeneration, the authority to finalise the public consultation arrangements and associated documentation for the Preferred Options stage.

Reasons

To provide elected members with relevant information in respect of this matter and to facilitate the successful delivery of the Joint Local Plan.

The public consultation on Preferred Options is not a statutory requirement, but in accordance with section 155 of the NPPF 'early and meaningful engagement and collaboration with neighbourhoods, local organisations and business is essential.' The draft Preferred Options Consultation document does not set or propose Council policy and so the decision to approve it for consultation purposes falls to the Executive - the Cabinet.

1. BACKGROUND

- 1.1** Cabinet has made previous decisions to prepare a Joint Local Plan with Stoke-on-Trent including the adoption of a Joint Statement of Community Involvement and undertaking public consultation on the Issues and Strategic Options consultation documents published as part of the local plan-making process, in February/March 2016 and July/August 2017 respectively.
- 1.2** The Joint Local Plan is a statutory development plan and is being prepared with Stoke-on-Trent City Council. The plan period is 2013 (the baseline year for all evidence) to 2033 and will eventually replace the adopted Joint Core Spatial Strategy 2006 - 2026 (which was adopted in 2009).
- 1.3** The Joint Local Plan should demonstrate that each local authority is planning positively to meet its development needs and is contributing to a sustainable pattern of development. In doing so it should seek to achieve a balance between social, economic and environmental objectives. Key considerations going forward will, therefore, be the impact of the plan on the local economy, social infrastructure, including education; health and social care and community facilities, as well as, the environment, including transportation; flood and water management; ecology.
- 1.4** The previous Joint Local Plan public consultation on Strategic Options ended on the 22 August 2017. Each representations has been taken into account in the development of the preferred development strategy, see section 2.3 below (full copy of the Strategic Options Consultation and Responses document is available on request or via the supporting documents link).
- 1.5** This next public consultation stage is to seek the community's views on the proposed preferred approach towards identified economic and housing development needs, as well as, identifying preferred site options and a retail hierarchy. It is important to clarify at this stage that no sites are being allocated for development; this does not happen until the Full Draft Joint Local Plan is produced and that is scheduled to be published for consultation in November and December 2018 (following a report to Cabinet in September).
- 1.6** The draft Preferred Options Consultation Document is to be considered by Planning Committee on 3rd January 2018. The recommendations of the Planning Committee will be reported to Cabinet via a supplementary report.
- 1.7** Stoke-on-Trent City Council's Cabinet will consider the draft Preferred Options Consultation Document on 4th January 2018, having first taken account of the views of their Planning Committee, scheduled to meet on 3rd January. The decision of the City Council Cabinet will be reported verbally to the Newcastle Cabinet meeting, also on 4th January, 2018.

2. ISSUES

- 2.1** Consultation on the preferred growth and site options (Preferred Options Consultation document attached as Appendix 1) is an informal stage in the preparation of the Joint Local Plan aimed at giving a further opportunity for the community to comment on the area's future development strategy.
- 2.2** The consultation document sets out the preferred options in respect of housing and economic growth and preferred site options for housing and employment. It also presents the retail and leisure evidence in terms of a hierarchy of centres and proposals for the amendment of some centre boundaries. The draft Preferred Options Consultation document covers the following subject areas:
1. Preferred Development Strategy and Options
 2. Key Strategic Developments
 3. Green Belt
 4. City, Town and Other Centres
 5. Natural and Rural Environment
 6. Waste and Minerals (Stoke-on-Trent only)
 7. Climate Change
 8. Infrastructure
 9. Character Areas

Strategic Options Consultation

- 2.3** The previous stage of the plan preparation was the Strategic Options Consultation, which was approved in June 2017, and was subject to formal public consultation in accordance with the Joint Statement of Community Involvement. This resulted in 140 respondents sending in representations. The results of the consultation exercise and the officer response thereto are contained within the Strategic Options Consultation and Responses Document (Supporting Document 1), which is available on request or via the supporting documents link. The general emerging themes have been taken into account and reflected in the draft Preferred Options Consultation document. The feedback has helped to refine the draft vision, aims and objectives of the Joint Local Plan and has been taken into account in the development of the preferred development strategy. In broad terms, the need for growth is accepted, however, there are differences of opinion about where this is accommodated between stakeholders (especially residents and developers). Having listened to the different comments and in the light of the Joint Local Plan's supporting evidence the draft Preferred Options Consultation document now aims to set out the Councils' preferred approach to development.

Government Consultation Paper – Planning for the Right Homes in the Right Places

- 2.4** In September, 2017, the Government introduced the "Planning for the right homes in the right places" consultation, which, amongst other proposals, included a standardised methodology for calculating housing need. The proposed approach is based on a formulaic approach where the starting point is a demographic baseline from which an uplift is applied, where appropriate, to account for market signals (i.e. the affordability of homes). This would effectively form a minimum housing requirement for local authorities. However, the consultation does include proposals to allow local authorities to plan for growth if local circumstances support the case for doing so.
- 2.5** Given that the results of the Government's consultation are not expected to be published until March 2018 and any housing figure derived from the introduction of a standard national formula is therefore not yet fixed the Councils have received legal

advice that it would not be appropriate at this stage to take such a housing figure into account.

- 2.6** In respect of housing the draft Preferred Options consultation document, therefore, relies on evidence in the published Strategic Housing Market Assessment (SHMA) Review 2017, which recommended that housing growth is aligned with the area's economic growth potential. However the plan making process is flexible enough to make adjustments once firm details are received from Government and this will be taken into account as appropriate at later stages.

3.0 Draft Preferred Options Consultation Document

- 3.1** This next stage in the plan making process sets out the preferred growth options in respect of housing and business development needs and the preferred sites to accommodate these needs. It also proposes a new retail hierarchy. The representations received as part of this consultation will be taken into account as part of the preparation of the Full Draft Plan, the next stage in the plan making process, when sites will be formally proposed to be allocated for development and new development management policies will be proposed.

Evidence

- 3.2** Additional evidence, which has recently been prepared to inform the Preferred Options, is the Joint Green Belt Assessment, the Draft Stoke-on-Trent Green Space Strategy, and the Councils' 2017/18 development monitoring, which includes 5 year housing supply statements for both Newcastle-under-Lyme and Stoke-on-Trent.
- 3.3** A sustainability assessment has also been prepared to support the draft Preferred Options Consultation document. This sets out high level impact and issues to be addressed (this has tested all proposals against a set of economic, environmental and social sustainability objectives). The results of the appraisal are set out in a Sustainability Appraisal Report (Supporting Document 2), together with a non-technical summary.

Preferred Growth Strategy

- 3.4** The proposed preferred growth option is Scenario C, as set out in the Strategic Options consultation document. This will deliver an identified need for a minimum of 199 hectares of employment land and 27,800 new homes between 2013 and 2033 across the plan area, with some potential uplift to help deliver wider economic aspirations, flexibility and choice where they can be demonstrated to be deliverable during the plan period.
- 3.5** This preferred option accords with the economic development strategies of both Councils and the Stoke-on-Trent Staffordshire Local Enterprise Partnership and is aimed at addressing two very significant issues:
- A population that is generally getting older and consequently with fewer people of a working age, and;
 - The Councils have not been building enough housing to meet demand over a sustained period of time. A direct consequence of this has been a growing disparity between supply and demand.

The shortage of market housing provision has exacerbated the shortage of affordable housing. As a result there is a need to build 242 affordable homes in NUL per annum (210 Stoke) over the next five years to clear the backlog (or shortfall) and meet newly arising need. Once the backlog is addressed the requirement would be reduced to 199 in Newcastle-under-Lyme per annum (66 Stoke-on-Trent).

- 3.6** The consequences of these problems in the housing market can be summarised as follows:
- Low wage economy unable to afford increasing house prices;
 - Young people unable to form households;
 - Fewer working age people living in the area;
 - Continued out migration of graduates and the economically active;
 - Lack of a skilled workforce constraining investment and economic growth and;
 - Deficiency in high value jobs particularly in the knowledge economy and entrepreneurial sectors.
- 3.7** To address these issues the preferred development strategy aims to achieve a step change in the housing market and the local economy, through the delivery of a minimum of 17,372 jobs by 2033 across the plan area, including 6,654 in Class B sectors (offices (other than financial and professional services for the public), light industry, general industry and warehousing).
- 3.8** To support the creation of Class B jobs it is proposed to provide a minimum of 199 ha across the plan area, plus a 15% buffer (229 ha) to provide choice and flexibility in the market.
- 3.9** Newcastle-under-Lyme's contribution to the employment land supply is 62.53 ha. Within the Borough this leaves a shortfall of 5.5 ha, while Stoke-on-Trent benefits from a surplus of 36 ha, against its identified need of 131 ha. Therefore, across the functional economic area (plan area) there is no shortfall in the supply of employment land. Nevertheless, Newcastle-under-Lyme still has the potential to support the creation of at least 7,613 jobs including at least 4,437 in the Class B sectors.
- 3.10** The agreed apportionment of the housing requirement is 11,720 and 16,080 homes for Newcastle-under-Lyme and Stoke-on-Trent respectively.

Preferred spatial strategy and broad locations

- 3.11** The preferred option for the broad location of employment and housing development is a hybrid of Options 4 (Combined Urban, Suburban and Rural Villages) and 6 (Combined (Option 4) + Major urban extension in to the Green Belt) which were set out at the previous Strategic Options consultation stage. This focuses development within the urban area mainly around key urban centres and, as far as possible on brownfield land, or on green space no longer required to meet open space standards. However, Newcastle-under-Lyme's urban area is heavily constrained by Green Belt making the delivery and identification of sites to meet the Borough's development needs more challenging.
- 3.12** Of Newcastle-under-Lyme's 11,720 dwelling apportionment, the preferred option indicates that only 9,621 (includes 1,080 completions) of these can be accommodated within the urban area, rural area and in sustainable urban extensions. Through the Joint Local Plan, the Borough Council is seeking to promote a significant mixed-use development in the Green Belt at Keele, as it is considered a strong case for "exceptional circumstances" can and should be made. This development has the potential to contribute significantly towards the development needs of the Borough and plan area, to support Keele University's growth ambitions and associated economic growth in the same location. In total this development accounts for 9% (21% of the Borough's) of the Joint Local Plan's housing supply requirement. Urban extensions are also proposed at Kids Grove, Holditch and Talke, bringing the total amount of development proposed within land currently designated as Green Belt to less than 11% (26% of the Borough's) of the Joint Local Plan's housing supply requirement. The full list of sites are shown in the

draft preferred options consultation document, at its 'Appendix 2 Preferred Options Sites'.

- 3.13** A deliberate attempt has been made to limit the extent of incursion into the Green Belt to protect its integrity by focussing development in these four areas. Similarly the protection and enhancement of the countryside has been given due consideration. In this respect the housing sites beyond the Green Belt in the open countryside reflect existing commitments.
- 3.14** This leaves a shortfall in Newcastle-under-Lyme of 2,099 new homes. Consequently, your officers have approached Stoke-on-Trent City Council to see if it can accommodate this shortfall. Stoke-on-Trent has identified capacity for 16,892 dwellings, which is 812 dwellings above their apportionment of the supply. However, these additional homes act as a buffer to ensure flexibility of the sites coming forward. If this buffer is taken into account in helping to meet the housing requirement across the plan area this still leaves a residual shortfall of 1,287 dwellings. Options around meeting the residual shortfall are presently under consideration and these include identifying additional capacity within Newcastle-under-Lyme (potentially going further into the Green Belt or open countryside than the draft Preferred Options Consultation document currently sets out); identifying additional capacity within Stoke-on-Trent (above the additional 812 dwellings already taken into account; however this will be largely dependent upon the viability of development within Stoke-on-Trent); and also finally consideration of asking neighbouring Local Planning Authorities if they can accommodate the residual shortfall within their areas. It is hoped that some or all of these strategies will result in the identification of the means to meet the Borough's shortfall.

City, Town and Other Centres

- 3.15** The draft Preferred Options Consultation document brings forward proposals to support a centres first approach and aims to make sure the centres are in the right locations to accommodate an appropriate level of retail development. This involves establishing a hierarchy of centres from strategic centres through to neighbourhood centres and proposes a town centre boundary for Newcastle Town Centre. It also acknowledges the position regarding out of town shopping centres where policies will ensure that these will be tightly controlled and must remain complementary to, and not compete with, the hierarchy of centres.

Gypsy and Traveller Sites

- 3.16** The Joint Local Plan is required to address the accommodation needs of Gypsy and Travellers and transit provision. At this stage a site selection methodology has been agreed between the two authorities and work is ongoing to identify how these needs can be met. Therefore at this stage the Councils will not be consulting on any preferred sites. However, to ensure that early and meaningful engagement is maintained it is proposed to arrange a separate consultation exercise on this specific matter in early summer 2018 (to feed into the Draft Plan stage). This will be important as a failure to transparently engage and consult with stakeholders on strategy development could undermine the 'soundness' of the JLP.

Natural and Rural Environment

- 3.17** The draft Preferred Options Consultation document outlines the position to protect the landscape and townscape, historic environment and green and open space. Individual strategies will outline where any proposed changes might be desirable (especially to deal with areas which create problems rather than add value) with quality being the under-pinning ambition.

Infrastructure

- 3.18** The preferred options growth is about making sure the City and Borough are sustainable in the plan period up to 2033 and in particular being able to accommodate population and employment growth. This will present challenges in terms of infrastructure including education, health, transport and utility services. Work has commenced on infrastructure planning and will be reflected in the Draft Local Plan. The local plan process greatly assists service planning in understanding potential demands going forward and partnership working with key stakeholders is vital to making sure all requirements are understood and met.

Character Areas

- 3.19** To support the planning process and to assist with infrastructure planning and engaging with stakeholders, especially the community, the overall plan area has been divided into smaller so-called character areas (20 across Newcastle-under-Lyme and Stoke-on-Trent). The relevant key development proposals in each character area are illustrated in a series of maps appended to the draft Preferred Options Consultation document, see Appendix five referring to the Character Areas. There have been some technical difficulties labelling some of the site option proposals. This map formatting issue will be resolved prior to the start of the public consultation exercise. However, the complete list of preferred housing and employment site options is provided in Appendix two of the Consultation document 'Preferred Options Sites.'

Duty to Cooperate

- 3.20** As the plan making process move towards more firm proposals, it is essential that we maintain dialogue with neighbouring authorities and key statutory stakeholders to identify any issues and how these are to be responded to. These will be captured in separate memorandum of understanding documents and an overarching Statement of Common Ground. This will include a memorandum of understanding and Statement of Common Ground between Newcastle and Stoke-on-Trent given the significance of preparing a joint local plan across joint housing and economic function areas and the Joint Advisory Group (representatives from both authorities) have been closely involved in preparing this document. This aspect of plan making is assessed at the examination stage.

4.0 OPTIONS CONSIDERED

- 4.1** The first option is to comply with statutory requirements and produce a Local Plan.
- 4.2** The alternative option is to not to produce a Local Plan. This would have potentially serious consequences in that the Council would not be fulfilling its statutory duty and the Department of Communities and Local Government would need to take steps to make sure this requirement was fulfilled. In addition, the local plan process makes sure the Council has the lead role in guiding and supporting the long-term development of the area. It is felt that the adopted Core Spatial Strategy does not provide the necessary policy framework to meet future housing and economic needs.
- 4.3** Both the Strategic Options Consultation and Preferred Option stages are non-statutory, but important in introducing what the Joint Local Plan aims to achieve over its plan period 2013 – 2033. Essentially they represent the 'front door' to the Local Plan process and, in accordance with section 155 of the NPPF, help to ensure that 'early and meaningful engagement and collaboration with neighbourhoods, local organisations and business' takes place.

5.0 PROPOSAL

- 5.1** The preferred option for the broad location of employment and housing development is a hybrid of Options 4 and 6 set out in the Strategic Options consultation. For Stoke-on-Trent this is Option 4 (Combined Urban, Suburban and Rural Villages) and for Newcastle-under-Lyme this is Option 6 (Combined (Option 4) + Major urban extension in to the Green Belt to the west of Newcastle-under-Lyme), with the commitment that the extent of incursion into the Green Belt and Countryside will be kept to a minimum to ensure delivery of its requirements. The full list of sites are shown in the preferred options consultation document.
- 5.2** Subject to approval, the intention is to go out to public consultation on the preferred growth strategy and site options between 1st February 2018 and 1 March, 2018. The document includes a set of consultation questions which will also be set out in a consultation response form which will be available via the website alongside the consultation document and supporting evidence. The Preferred Options Consultation document is site specific and notices will be posted in addition to the usual consultation arrangements. Consultation will be carried out in line with the adopted Statement of Community Involvement.
- 5.3** Following the consultation exercise on the Preferred Options Consultation document all responses will be considered by both Councils and a response to each representation produced and reported back to each respective Cabinet in September 2018. The responses will help to inform the production and approval of a Draft Joint Local Plan. The Draft Joint Local Plan will be the subject of consultation in late autumn 2018 before the plan is then re-considered in light of further representations made, finalised and then submitted to the Secretary of State for independent examination. The independent examination on the final submission plan will be carried out by a government appointed inspector, to determine whether the plan is sound and have been prepared in line with national planning policy and the duty to co-operate. Anyone who makes a representation during the preparation of the Joint Local Plan (at any stage) will be kept informed of the plans progress and invited to make further comments.

6.0 REASONS FOR PROPOSAL

- 6.1** This consultation on the Preferred Options document forms part of the Regulation 18 process in the preparation of the Joint Local Plan which is a statutory development plan and is being prepared with Stoke-on-City Council. The Council has signed up to an agreed plan making programme which seeks to get a full plan through the examination process and adopted.

7.0 OUTCOMES LINKED TO CORPORATE PRIORITIES

- Creating a clean, safe and sustainable borough.
- Creating a healthy and active community.
- A borough of opportunity.

8.0 LEGAL AND STATUTORY IMPLICATIONS

- 8.1** The Local Plan is a statutory requirement and needs to conform with the requirements set out within the Planning and Compulsory Purchase Act, 2004 ("the 2004 Act") and the Town and Country Planning (Local Planning) (England) Regulations 2012 ("the 2012 Regulations").
- 8.2** Once adopted, the Local Plan will replace the adopted Core Spatial Strategy, 2009 and saved policies of the Newcastle-under-Lyme Local Plan 2003 - 2011.
- 8.3** The National Planning Policy Framework and the National Planning Practice Guidance, containing guidance on how to prepare a Local Plan, have been taken

into account in the preparation of this report together with the legal requirements as set out in 2004 Act and the 2012 Regulations.

- 8.4 Regulation 18 of the 2012 Regulations require the Council as the Local Planning Authority to consult on draft proposals for the local plan and to consider any representations received.

9.0 EQUALITY IMPACT ASSESSMENT

- 9.1 There are no equality or EIA impacts arising as a result of this report. As part of the preparation of the Joint Local Plan an Equality Impact Assessment will be carried out.

10.0 FINANCIAL AND RESOURCE IMPLICATIONS

- 10.1 The costs of the public consultation exercise are provided for in the Planning Policy Team budget.

11.0 MAJOR RISKS

- 11.1 These include:

- Failure to provide robust evidence base for the emerging joint Local Plan.
- Failure to meet the timetable for the preparation and adoption of the Joint Local Plan.
- Failure to transparently engage and consult with stakeholders on strategy development.
- Failure to agree with Stoke-on-Trent City Council.

12.0 SUSTAINABILITY AND CLIMATE CHANGE IMPLICATIONS

- 11.1 Whilst there is no direct impact, the Local Plan provides the framework to support key initiatives through the sustainability assessment. In particular, open space, green infrastructure; quality environment and air are integral to this framework and overall health and wellbeing.

13.0 KEY DECISION INFORMATION

- 12.1 The proposals would impact directly upon all wards of the Borough, and is included in the Forward Plan.

14.0 EARLIER CABINET/COMMITTEE RESOLUTIONS

- 13.1 Cabinet March 2014
Cabinet January 2016
Cabinet June 2017

15.0 LIST OF APPENDICES

- Appendix 1 – Newcastle-under-Lyme and Stoke-on-Trent Draft Preferred Options Consultation Document

16.0 SUPPORTING DOCUMENTS

- Supporting Document 1 - Strategic Options Consultation and Responses Document
- Supporting Document 2 – Preferred Options Consultation- Sustainability Appraisal

17.0 BACKGROUND PAPERS

- Strategic Options Consultation Document July 2017
- Strategic Housing Market Assessment (July 2015) and Update June 2017.
- Strategic Housing Land Availability Assessment 2017
- The Employment Land Review – December 2015
- Newcastle-under-Lyme 5 Year Housing Land Supply Statement – August 2017
- Stoke-on-Trent 5 Year Housing Land Supply Statement – November 2017
- Stoke-on-Trent Annual Planning Monitoring Report - November 2017
- Draft Stoke-on-Trent Green Space Strategy 2017-2033
- Draft Technical Papers for Housing, Employment and Green Belt

Stoke-on-Trent City Council and
Newcastle-under-Lyme Borough Council

Joint Local Plan Preferred Options Consultation document

February 2018



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1.0 Introduction

- 1.1 This consultation document is the next stage in the preparation of our Joint Local Plan, which will guide and help to shape the development of the area. This document is the Preferred Options stage of the Joint Local Plan production and aims to build on the Issues and Strategic Options consultations which took place in February/March 2016 and July/August 2017 respectively.
- 1.2 The Joint Local Plan is a statutory plan for the area and will ensure that long term policies are in place to manage and meet the needs of local people and businesses for employment, housing, green space and supporting services. The plan's time frame covers 2013 – 2033 and is being produced in consultation with a wide range of stakeholders, statutory consultees and local people.
- 1.3 The Joint Local Plan sets out the strategic vision and objectives for the plan area and once adopted it will be clear what types of development will be supported by each local planning authority, where development will take place and when it is likely to be built. The Joint Local Plan will therefore play an important role in:
- Attracting and directing investment in housing, jobs, shops and facilities.
 - Seeking to meet community aspirations
 - Setting a framework for encouraging and managing development
 - Securing the physical infrastructure to support new development including; transport, telecommunications, water supply, energy, health and community facilities and the protection and enhancement of high quality open spaces for both sport and recreation.
 - Protecting and enhancing our natural and historic environment, including landscape.
 - Increasing the attraction of the area as a tourist destination and facilitating the development of leisure, arts and cultural assets.
- 1.4 This Preferred Options document sets out the preferred development strategy and sites with a view to these being included in the draft local plan.
- 1.5 The diagram set out in Appendix 1 sets out the various stages of plan production and the progress made so far.
- 1.6 The representations that were received through the previous Strategic Options Consultation have been used to inform the preferred strategy and options in respect of housing and economic growth and the broad locations where development could go. The consultation responses have also been used to further refine the proposed vision and aims and objectives for the Joint Local Plan (See Appendix 2). The revised Joint Local Plan objectives have been subject to a further sustainability appraisal which concluded that the changes

have no overall significant effects on sustainability beyond those previously identified during the sustainability appraisal of the Strategic Options.

- 1.7 The preferred strategy and options are based on a growth scenario aiming to provide a minimum of 199 hectares of employment land and 27,800 houses during 2013-33. This will seek to facilitate the delivery of a range of quality housing and viable employment sites to address key issues around job creation; retaining and attracting an economically active workforce; provision of affordable housing including housing for young families at an affordable price.
- 1.8 The document also sets out the position regarding the retail centres in the plan area. It is proposed to consider gypsy and traveller requirements in a separate consultation before preparation of the Joint Draft Local Plan to confirm the methodology and site selection criteria.
- 1.9 The Preferred Options consultation is an important stage in the plan-making process and you can have your say by taking part in the consultation (see para 13.16).
- 1.10 At the time of producing the Preferred Options there are three significant factors which could further influence the Joint Local Plan within the plan period, as set out below. Given that at the present time these remain relatively aspirational or have a degree of uncertainty they have been considered but **not** been taken into account at this stage of the plan production. Should any significant developments occur this will be reviewed during the plan production.
 - **HS2** – The Government have proposed to construct a high speed rail link from London to Manchester. At this stage, any potential growth in the wider economy arising from HS2 is not being taken into account in the Joint Local Plan because the Government's consultation proposals in this regard emerged after the start date of this Plan and the associated evidence base. It is however recognised that HS2 will have implications for the plan area in the medium to the long term and these will need to be properly planned for in due course. At this stage it is known that the proposed route for Phase 2a passes through the plan area. A Hybrid Bill has been laid before Parliament, an Environmental Statement published, and areas of land to be safeguarded have been identified. However it is difficult to assess the timescales or implications of HS2 at this time.
 - **Constellation Partnership** – this informal partnership of seven Local Authorities (including the two Councils which are responsible for preparing this Joint Local Plan) and the two Local Enterprise Partnerships of Stoke on Trent and Staffordshire and Cheshire and Warrington emerged in the autumn of 2015 in response to the Government's plans for HS2. Its' main objective is to capitalise on the opportunities that HS2 and supporting infrastructure could bring to the

area of north Staffordshire and south Cheshire. At this stage the Partnership has identified an ambition to deliver 100,000 new homes and 120,000 new jobs across the wider area by 2040 predicated upon assumptions in relation to transport infrastructure investment. At this point in the Joint Local Plan process whilst these ambitions are acknowledged it would be both premature and inappropriate to respond. That said, it is envisaged that as the plans for HS2 and any associated infrastructure and supporting evidence become apparent it will trigger a partial review of the Joint Local Plan.

- **Government Consultation Planning for the Right Homes in the Right Places** - while the Preferred Options Consultation document was being prepared, the Government published a consultation on its proposed standardised approach to assessing local housing needs. This is proposed to be applied from March 2018 onwards. The standardised approach aims to provide a minimum housing target. However the Government acknowledges that local authorities may put forward proposals that lead to a local housing need above that given by a standardised approach. It is also recognised by Government that this could be as a result of local economic ambition which seeks to grow an area's economy in line with the Government's industrial strategy (see paragraph 2.13).

2.0 Preferred Development Strategy and Options

Context

- 2.1 Two of the key aims for the Joint Local Plan to achieve are for the area to become a UK central hub for innovation and investment, and for dynamic and diverse neighbourhoods to be delivered. The Preferred Options document positively plans to meet the needs of Newcastle-under-Lyme and Stoke-on-Trent through identifying the preferred housing and employment sites to deliver and meet local housing and employment needs in a balanced, sustainable and successful way.
- 2.2 Through the Strategic Options Consultation there were several key themes that emerged that have helped to develop a growth strategy – the need to:
 - support the existing urban areas and support ongoing regeneration of the centres and existing brownfield sites;
 - support employment growth and providing dwellings in appropriate locations to improve connectivity between employment and residential areas;
 - deliver growth in the housing stock to contribute towards meeting the national shortfall;
 - respect the natural resources and heritage assets of the area;

- address issues of house prices and affordability in the plan area;
- increase the attraction of the area as a tourist destination and to facilitate the development of leisure, arts and cultural assets.

2.3 Both the 'Issues' and 'Strategic Options' consultation stages recognised that the economy of the area was adversely affected by two significant issues:

- a population that is generally getting older and consequently with fewer people of a working age;
- neither authority has been building enough housing to meet demand over a sustained period over time. This disparity between supply and demand is most marked in Newcastle-under-Lyme.

2.4 The housing undersupply has led to increasing house prices, a problem not sufficiently compensated for by cheaper house prices in Stoke-on-Trent because of the low-wage economy. This has impacted on young peoples' ability to form households with the consequence that fewer people of a working age are living in the area, or moving into the area, and they are likely to continue to move out of the area to work. This situation has constrained employment growth because of the lack of skilled labour force. The outward migration of young people - in particular graduates - has restricted the area's ability to attract investment in jobs, especially high-value jobs in which the area is deficient.

2.5 However, it is apparent that the Employment Land Review considers that the plan area will see strong growth in employment in the future. Indeed the Councils' own economic development strategies are aligned with the Government's Industrial Strategy and the Midlands Engine initiative and aims to deliver transformational change. The SHMA is clear that to achieve this transformational change and help the area to realise its true economic potential we need to:

- attract and retain enough young people to achieve an above-trend growth in the working age population;
- provide sufficient well paid employment opportunities to attract and retain younger households and build enough homes to accommodate the workforce, which are a) at an affordable price and b) of the right type and quality.

2.6 The development strategy set out in the Joint Plan therefore seeks to deliver aspirational yet realistic growth in a responsible and sustainable way. This means that the development strategy is planned, and will deliver growth over the entire plan period from 2013 to 2033 in a comprehensive way so as to avoid ad hoc development. The intention is that sustainability drives the preferred strategy and that wider infrastructure improvements will be achieved by delivering sufficient development which is concentrated and coordinated to:

- deliver a step change in the economy through employment and housing growth
- make the area attractive to inward investment
- support businesses and jobs growth
- provide high quality jobs which local people are sufficiently skilled to access
- attract and secure investment in infrastructure, such as highways and utilities networks
- enhance the sustainability of existing communities nearby
- support young people to access homes at a price they can afford
- retain and attract graduates
- minimise the need to travel by matching housing with employment growth opportunities
- phase development and infrastructure delivery
- enable the planning and design of an area to ensure the efficient use of natural resources and heritage assets, such as sustainable urban drainage, to minimise the impact of the development on the environment.

Preferred Growth Option

2.7 The Strategic Options Consultation document set out four growth scenarios that were being considered for the Joint Local Plan to deliver, as follows:

Table 1 - Strategic Options Growth Scenarios

Growth Scenario:	Description:	New Houses Required Each Year:	New Houses Required 2013-33:	Employment Land Required 2013-33 (hectares):	New Jobs per Year:
A	Carry forward the existing levels of growth set out in the Core Spatial Strategy	855	17,100	249	N/A
B	Support our natural population growth	1,084	21,680	180	598
C	Supporting our economic growth (OAN)	1,390	27,800	199	869
D	Maximising our economic potential	1,814	36,280	258	1,609

2.8 Scenario A represents a continuation of the Core Spatial Strategy target which is now based on out of date evidence and is therefore unlikely to be

compliant with current national planning policy. Scenario B is based on past trends, and whilst it would help to meet needs from natural population growth it won't help to drive economic growth. Scenarios A and B also had lowest levels of support from the responses received during the public consultation on the Strategic Options and will not deliver the step change the Councils are seeking.

- 2.9 This leaves Scenario C, which would seek to deliver the area's Objectively Assessed Need which includes increased economic growth and housing numbers in a sustainable and realistic way that will address business growth needs and the inherent weaknesses in the housing market.
- 2.10 A large number of consultation responses (47%) favoured Scenario D, however it must be noted that the vast majority of those responses were received from the development industry. As such they do not necessarily represent a broad consensus of responses from across the plan area.
- 2.11 As Scenario D would deliver growth which is greater than the Objectively Assessed Need it could be considered likely to meet some of the Tests for Soundness i.e. for being positively prepared and consistent with national policy, but not the remaining two tests of soundness (the effectiveness of the growth scenario - how deliverable the growth would be within the Joint Local Plan timeframe), and whether it is justified by proportionate evidence (the plans for higher economic growth are not yet fully evidenced). Furthermore, regarding the deliverability of Scenario D, it is worth noting that while paragraph 154 of the National Planning Policy Framework requires local plans to be aspirational, it also requires them to be realistic. In the Sustainability Appraisal for this scenario many of the scores for the environmental objectives were identified as negative due to the effect that higher levels of development are likely to have on the environment of the plan area. Under this scenario it becomes critically important for planning policies and the selection of sites to ensure that there are no impacts on the environment or that any impacts are at least minimised and are mitigated or compensated against. This Scenario would also require substantial incursions into the Green Belt and potentially beyond, in to the open countryside.
- 2.12 Reference has been made previously to the Government Consultation on "Planning for the right homes in the right places" which sets a number of proposals to reform the planning system to increase the supply of new homes and increase local authority capacity to manage growth. The proposals include a standard method for calculating local authorities' housing need. Applying the standard methodology in Stoke-on-Trent and Newcastle-under-Lyme indicates an annual need figure of 848 new homes across the Plan area. The Government figure is primarily based upon projections of population growth, but an adjustment has been made to take account of the affordability of homes in Newcastle-under-Lyme. Nevertheless the consultation is clear that local authorities are allowed to plan for growth if local circumstances support the case for doing so. At this stage it is considered appropriate and

necessary, to continue to plan for housing growth in accordance with the development needs set out in the Strategic Housing Market Assessment Review 2017, (Scenario C1,390 homes per annum). This will ensure housing growth is aligned with the area's economic growth potential and critically will seek to address locally specific issues, such as worsening affordability, the back log in affordable housing and balancing the local demographics structure.

- 2.13 In summary, Growth Scenario D is not likely to represent the most up to date position on deliverable growth in its current form. Growth Scenario C therefore represents the most appropriate growth scenario at present as it is based on proportionate evidence, and therefore considered more realistic, has been positively prepared and is consistent with national planning policy. The sustainability appraisal has highlighted that any potential negative effects associated with this scenario could have more potential for mitigation and the public consultation responses identified a broader consensus of support for this scenario.
- 2.14 The Strategic Options Consultation document identified that in order to accommodate the levels of growth identified under Growth Scenario C, some adjustment to existing local planning policies and designations are likely to be required.

The preferred option for growth is to deliver the Objectively Assessed Need of 230 hectares of employment land (including 15% buffer) and 27,800 new homes between 2013 and 2033 (1,390 new homes per year) as a minimum across the plan area, with some potential uplift to help to deliver wider economic aspirations, flexibility and choice where they can be demonstrated to be deliverable during the plan period.

Summary of findings from the Sustainability Appraisal

- 2.15 As this is a high level preferred option, determining the impact on the sustainability objectives is largely dependent on further information about how development will be accommodated, i.e. the location, type and form of development. This Preferred Growth Option does however have major positive effects identified against the objectives to provide housing choice and help meet the housing needs of the whole community and to provide a range of employment land and premises. Most of the comments and mitigation measures identified against the objectives relate to having appropriate planning policies and the selection of sites that will manage development and eliminate or minimise any potential impacts on energy use, air quality, biodiversity and the natural environment, site remediation, flood risk, the historic environment, green space, waste generation and treatment, city and town centres and wider infrastructure such as transport networks, water infrastructure and community services and facilities. These will all need to be

addressed as the preferred level of growth is taken forward in the Draft and Final versions of the Joint Local Plan.

Consultation Question:

Do you agree with the preferred Growth option for the Joint Local Plan?

Preferred Spatial Option

- 2.16 This section provides a commentary on the Joint Local Plan Strategy Key Diagram and as such should be read in conjunction with it. It outlines the overall spatial strategy for the entire plan area and the basic spatial principles underpinning the strategy and is in alignment with the preferred growth strategy. Overall the strategy must meet the local needs of Newcastle-under-Lyme and Stoke-on-Trent in ways that protect and sustain the environment. These local needs will require a careful balance of growth, change and restraint.

Strategic Sub Areas

- 2.17 The physical, social and economic landscape of the plan area is extremely diverse, and presented several different challenges and opportunities. To ensure that the Plan addresses these challenges and opportunities efficiently and comprehensively, the plan area has been divided into five distinct strategic areas:
1. Stoke-on-Trent City Centre and Railway Station
 2. Stoke-on-Trent Urban Area
 3. Newcastle-under-Lyme and Kidsgrove Urban Area
 4. Newcastle-under-Lyme Western Urban Extensions
 5. Newcastle Rural Area
- 2.18 These sub areas are shown on Plan 1 and form the geographical extent of the area spatial strategies that follow. The identification and definition of these sub-areas is based upon an analysis of the distinctive social, economic and environmental characteristics of the plan area and the geographical focus of regeneration/investment strategies.
- 2.19 Overall the strategy is based on the strategic principles of regeneration, encouraging development on brownfield land and supporting the existing urban areas. This way we can ensure employment and housing growth is intrinsically linked whilst also ensuring that the rural area can grow in a manner which supports the principles of sustainability. The strategy is

balanced and proportionate but will also deliver a step change in the economy.

- 2.20 Stoke-on-Trent is divided into two strategic areas. The first, Stoke-on-Trent City Centre and Railway Station, lies in the centre of the area and encompasses the ward areas of Etruria & Hanley; Joiners Square; Hanley Park & Shelton and Birches Head & Central Forest Park. This is a priority area for housing, retail, leisure and office growth and as such it is appropriate to ensure a minimum level of development is identified for delivery within this area. This is set out in more detail in section 3.
- 2.21 The rest of Stoke-on-Trent Urban area, excluding the Green Belt, is important in its role of providing distinct urban communities and neighbourhoods around a hierarchy of larger and smaller town centres, local centres and neighbourhood facilities. It is considered important that the urban area is characterised by its distinctive and unique areas and therefore chapter 12 identifies the character areas that this area is split into. However for the purpose of the preferred strategy this is one strategic area and the rest of the development growth (excluding that appointed to the City Centre and surrounding area) will be appointed to the whole of the area.
- 2.22 Newcastle is divided into three sub areas:
- Newcastle-under-Lyme and Kidsgrove Urban Area based on the existing urban neighbourhoods, which seeks to maximise new development opportunities close to existing settlements, established employment sites and significant road and rail transport infrastructure.
 - Newcastle-under-Lyme Western Urban Extensions, where significant new development is proposed on the outskirts of the existing urban area, to help make a step change in the local economy and contributing to the delivery of housing and a sustainable pattern of development.
 - Newcastle rural area, where a small level of development is proposed, largely made up of existing commitments (75%), which will contribute to meeting local needs and the needs of the Borough as a whole.

Summary of findings from the Sustainability Appraisal

- 2.23 All of the potential effects were identified as being dependent on implementation. This is a result of the preferred option being focused on setting out the principle of applying five different strategic sub-areas within the Joint Local Plan, rather than providing detailed information about how policies and proposals will be applied through this approach at this stage. The sustainability appraisal for the Draft Local Plan will be able to provide a more thorough analysis of the potential effects of different aspects of this approach.

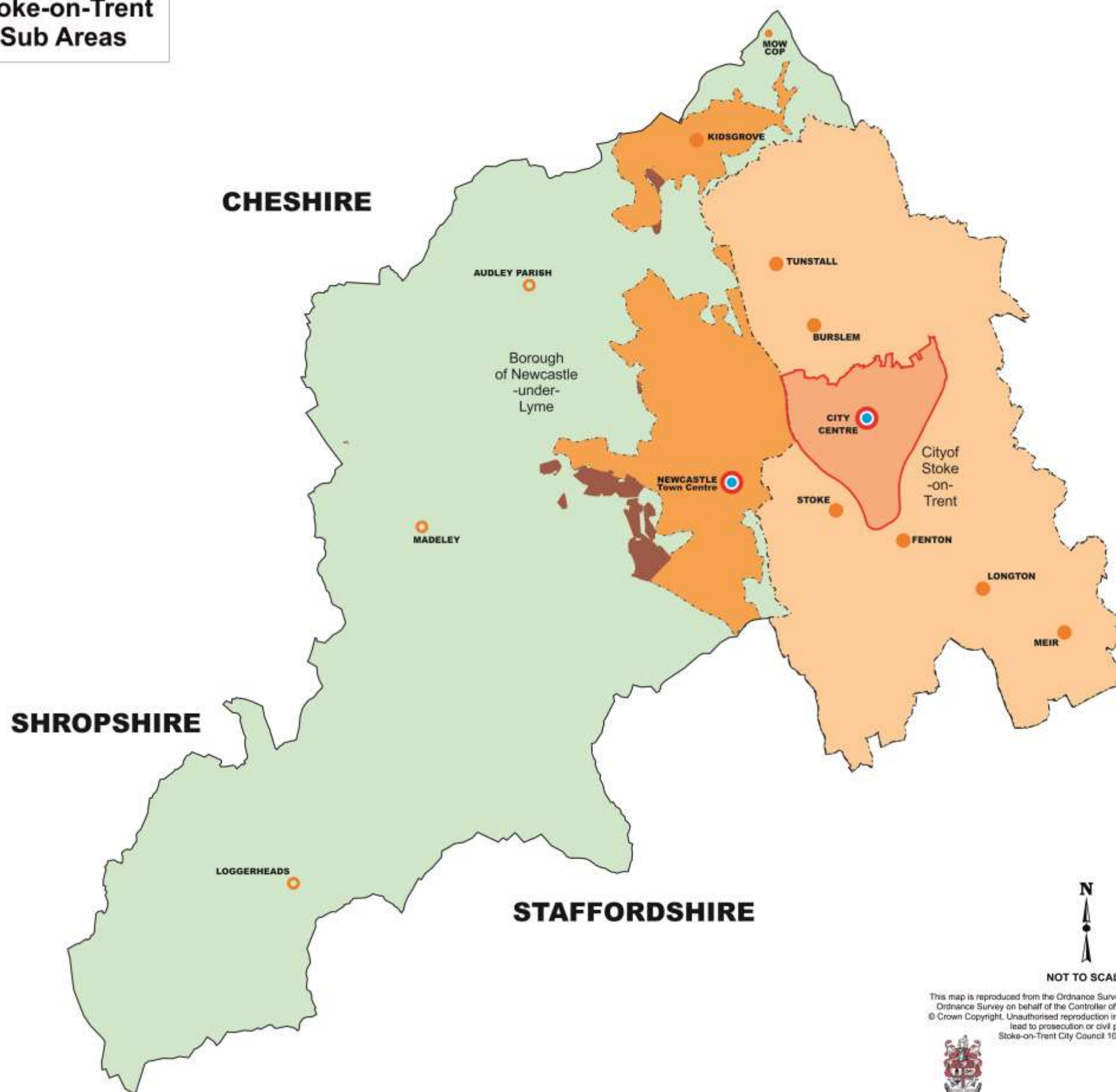
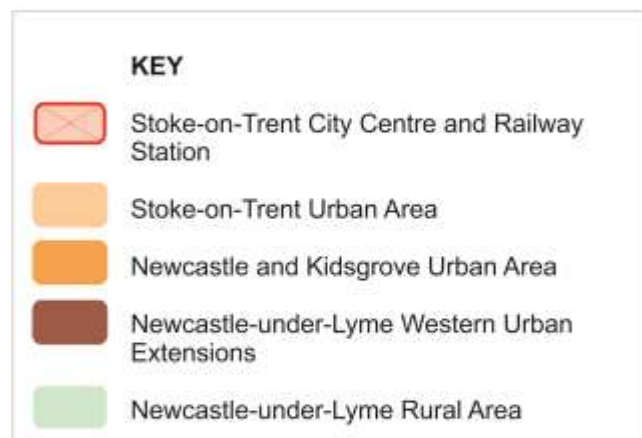
Consultation Question:

Do you agree with the preferred strategic spatial option for the Joint Local Plan?

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Newcastle-under-Lyme and Stoke-on-Trent Joint Local Plan - Strategic Sub Areas



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Preferred Spatial Distribution of Employment

Background

- 2.24 A priority of the Joint Local Plan is to plan positively for balanced growth to meet the development needs of Newcastle-under-Lyme and Stoke-on-Trent through a sustainable growth strategy which supports the preferred vision and aims of Newcastle-under-Lyme and Stoke-on-Trent being an innovative hub for investment and their continuation as great places to live, learn and work.
- 2.25 Stoke-on-Trent and Newcastle-under-Lyme have a Gross Value Added (GVA) per head output that is significantly below the national average. The joint SHMA (2015, updated 2017) identified that historically, both areas have seen a net outmigration of young people and graduates in search of better job prospects elsewhere, a trend that both Councils want to reverse. This is reflected in the proposed objectives of the Joint Local Plan which seek to reduce net outward migration, support and boost business growth, prioritise job growth and diversify the employment base. This approach will help to bring not just more jobs, but also more secure, better-quality and better-paid jobs to the area, and jobs which have better prospects for career progression.
- 2.26 The Issues Consultation document identified that in recent years traditional heavy industries in the plan area have given way to more modern types of industry, such as advanced manufacturing, service industries, research and development, storage and distribution and high technology industries. This transition has left a legacy of large-scale former industrial sites within Stoke-on-Trent's urban area which have the potential to accommodate future economic development to cater for these new industries. In contrast employment growth in Newcastle-under-Lyme is constrained due to the lack of suitable land supply in the urban area.

Preferred Employment Growth Strategy

- 2.27 Coupled with the preferred strategy for housing our objective is to provide for 17,372 new jobs (7,613 in Newcastle-under-Lyme and 9,759 in Stoke-on-Trent), of which 6,654 (4,437 in Newcastle-under-Lyme and 2,217 in Stoke-on-Trent) are in 'B Class' sectors, (identified under the Use Classes Order 2016 as offices, research & development, large manufacturing, light industrial and storage and distribution uses). Outside of 'B class' jobs there is also a large projected growth in public services (including schools and hospitals), construction, accommodation, food services and recreation, and professional services.

- 2.28 Accommodating this level of 'B Class' growth will require a minimum of 199 hectares of new employment land across the plan area by 2033. This is derived from an identified need of 68 hectares in Newcastle-under-Lyme and 131 hectares in Stoke-on-Trent. As the preferred employment land supply set out below identifies, most of this growth can be accommodated on business parks, industrial estates and stand-alone sites.
- 2.29 By providing sufficient land for employment development, the Joint Local Plan plays the primary role in meeting the projected growth in 'B Class' jobs. Delivery of this level of growth is also dependent on a range of interventions from other partners, including (amongst others) landowners, Central Government and the Stoke-on-Trent and Staffordshire LEP. Wider interventions that can be delivered by partners include promoting greater entrepreneurialism, business support, improving skills and training, improved road, rail and IT infrastructure and the better marketing of the area for inward investment.
- 2.30 To achieve the ambition for growth, it is essential that the preferred strategies for housing and employment development are closely aligned. Ensuring people have access to a good quality housing offer which provides a range of choice, and is located close to their place of work within the plan area therefore underpins the preferred growth strategy. The close alignment of housing and employment growth will mitigate the risk of local employers being unable to recruit appropriately qualified and skilled people, which in turn has the potential to constrain economic growth and limit the jobs available.
- 2.31 The key elements of the preferred strategy for employment growth include:
- providing an attractive range and choice of new employment land, which meets the needs of modern manufacturing, warehousing and distribution companies
 - maximising the opportunity arising from the designation of the Ceramic Valley Enterprise Zone
 - strengthening the role of our two universities as local centres of excellence in research and development as well as in teaching, providing for their growth ambitions and for the growth and development of associated businesses such as those technology clusters which are established at Keele Science and Innovation Park, and
 - strengthening the appeal and 'offer' of our City and Town Centres, for office development, alongside other employment generating uses such as retail and leisure.

Preferred Employment Land Supply

- 2.32 Both Councils have been reviewing employment land monitoring information from 2013 to 2017 and the evidence provided by the Employment Land Review (2015) to determine how much land could be delivered for

employment development in order to support the provision of more and better quality jobs. The total potential employment land supply is summarised in the table below.

Table 2 – Employment Land Supply

	Hectares of Employment Land:		
	Newcastle-under-Lyme	Stoke-on-Trent	Joint Local Plan area
New employment land developed between 2013 and 2017	4	37	41
Vacant land with planning approval for new employment development at 1 April 2017	29	87	116
Other land from the Employment Land Review (2015) which is considered to be suitable and could be allocated for employment development:	30	43	73
Total Potential Employment Land Supply:	63	167	230

- 2.33 The table shows that the employment land requirement of a minimum of 199 hectares up to 2033, identified under the Objectively Assessed Need can not only be met but can be exceeded across the plan area (see Appendix 2 for list of sites). However, the land supply within each local authority presents contrasting situations. Newcastle-under-Lyme experiences a shortfall of 5.5 hectares against its identified need of 68 hectares, whilst Stoke-on-Trent benefits from a surplus of 36 hectares, against its identified need of 131 hectares. These individual differences have to be considered in the context of not only meeting the need for employment land across the Functional Economic Market Area (FEMA), which is the same as the Joint Local Plan area, but also the requirement of national planning policy for local planning authorities to plan positively to meet their own development needs.

Stoke-on-Trent

- 2.34 In Stoke-on-Trent 89% of this employment land supply comprises of previously developed land. The preferred sites are all located in Strategic Sub-Areas 1 and 2 and are concentrated close to the City and Town Centres and around major transport corridors (that is the A50 and A500 and the Manchester-Stafford and Crewe-Derby railway lines). The Ceramic Valley

Enterprise Zone covers a large proportion of this employment land supply, from Cliffe Vale and Etruria Valley in the centre of the conurbation to Chatterley Valley and Tunstall in the north.

- 2.35 The updated monitoring evidence identifies that Stoke-on-Trent is experiencing a marked improvement in the take-up of employment land in recent years and this is now at a level that is comparable to longer-term trends.

Newcastle-under-Lyme

- 2.36 Newcastle-under-Lyme's supply is made up of a few large sites, including Chatterley Valley and Keele Science and Innovation Park; along with a number of small sites, often comprising of small undeveloped areas amongst established well-developed employment sites. Keele and Staffordshire Universities are major economic drivers and provide hubs for education, research and development. The science and innovation park at Keele provides collaborative links to the University. The continuation of the success of Keele University as a centre of excellence is a vital part of the growth strategy and delivery of the Joint Local Plan's vision to be a hub for investment
- 2.37 Newcastle-under-Lyme monitoring evidence shows that completions are comparable to trends in recent years but over a longer term trend completions were larger. This would indicate that within Newcastle-under-Lyme the supply of good quality employment sites is now constrained.
- 2.38 A major factor in Newcastle-under-Lyme's constrained brownfield employment land supply is due to the Council successfully pursuing a strategy of urban regeneration over the last 40 years. This strategy has delivered successful sites such as Parkhouse, Lymedale, and part of Chatterley Valley for employment purposes; along with sites for open space such as Apedale Country Park. This diminishing supply, exacerbated in recent years with the loss of sites to housing, has drained the supply of employment land and resulted with the limited the range of sites now available. In addition the provision of new sites is constrained by Green Belt.

Stoke-on-Trent and Newcastle-under-Lyme

- 2.39 The preferred employment land supply of 229.68 hectares identified in the table above represents a 15% buffer above the minimum 199 hectare requirement identified within the objective assessment of needs and will enable the Plan to deliver balanced growth across the area. This buffer will provide the choice and flexibility of employment land, to account for future losses of existing employment sites and in case some of the identified site supply is not brought forward for employment development.

- 2.40 The preferred option for locating this growth is to utilise the identified land supply to deliver employment development that is located:
- in close proximity to the strategic road and rail network (M6, A34, A50, A500 and the West Coast Mainline) to facilitate inward investment
 - close to residential communities to reduce the need to travel and to ensure that business has ready access to a potential workforce;
 - where it would appeal to the market, providing viable sites with easy access in attractive surroundings, and
 - where it takes advantage of North Staffordshire's location, major economic drivers such as Keele University and the Ceramic Valley Enterprise Zone and an improving City Centre.
- 2.41 This accords with Broad Location Options 2, 4 and 6 that were presented within the Strategic Options Consultation document and it reflects the existing pattern of development that is described earlier in this chapter.
- 2.42 The councils will continue to develop the evidence work on the employment land supply to ensure that the allocations made in the Draft and Final versions of the Joint Local Plan are the most appropriate, and make efficient and effective use of our employment land supply.
- 2.43 A plan of the committed and preferred employment sites is shown on Plan 2. Further information about the sites included in the potential supply of employment land is detailed in a supporting employment land technical paper.

Summary of findings from the Sustainability Appraisal

- 2.44 Most of the potential effects are dependent on implementation as the impacts of the preferred employment land supply will depend on the scale and types of uses that will be accommodated on each site and how the development of these sites will be managed through planning policy. There were potential positive effects identified against objectives to regenerate degraded environments, increasing life expectancy and the health and mental well-being and the provision of a range of community facilities. A major positive effect was identified against the objective to provide a range of employment land and premises. The employment land supply should be balanced with housing growth which also has economic benefits (through construction and the operation of the housing market). There may be potential pressures on the transport network arising from this land supply and this should be mitigated through transport infrastructure improvements, particularly at major interchanges and hubs.

Consultation Question:

Do you agree with the preferred option of delivering an employment land supply of 230 hectares (2013-33) in order to provide quality, choice and flexibility?

Flagship employment projects

- 2.45 Key strategic sites within the preferred employment land supply that have a major role in delivering growth are described in more detail below.

Ceramic Valley Enterprise Zone

- 2.46 The Ceramic Valley was designated by the Government as an Enterprise Zone in November 2015. The designation straddles Stoke-on-Trent and Newcastle-under-Lyme and capitalises on the plan area's research expertise, skills, supply chains and connectivity to national and international markets, via the A500 and M6. It is focused on unlocking the development potential of six key sites located close to the A500, mainly for ceramic technology industries. The development of these sites will be facilitated through measures such as investment in infrastructure and site remediation and relief of business rates. This will ensure that the sites can be made shovel-ready for new build development. Stoke-on-Trent is the natural hub for this industry, and the rapid growth of a Ceramic Valley would enable the UK to compete with the growing technical ceramics sectors in the USA, Germany and Italy. The Enterprise Zone therefore seeks to accelerate the diversification of the area's key industry from pottery to technical ceramics.
- 2.47 The development of sites within the Enterprise Zone will support a wide range of light industry, office, general manufacturing and warehouse/distribution uses, with a particular focus on advanced ceramics, automotive supply chain, energy and power generation, logistics and business and professional service industries. Collectively, these sites comprise of 140 hectares of available employment land, forming the single largest contribution to the overall employment land supply that the Joint Local Plan can deliver. Specific planning policies that will support the delivery of sites in the Enterprise Zone will be presented in the Draft Local Plan.

Keele Science Park

- 2.48 Keele University is one of the UK's top ranked universities and, together with its Science and Innovation Park, is a key driver of the North Staffordshire economy. Overall the university currently contributes £125 million per year into the local economy and supports around 3,400 FTE jobs in Stoke-on-Trent and Newcastle (source: Regeneris Consulting). In a relatively low waged economy such as North Staffordshire, the calibre of jobs supported by Keele

University and Science Park is extremely important for the area's economic prosperity. Helping it to grow and thrive will be critical to the future success and long-term sustainability of the area, ensuring that the sub-regional economy is fit for a future which will be typified by rapid technological change.

- 2.49 Furthermore Keele presents a location-specific opportunity to target knowledge-economy/research and development-based businesses, through the expansion of the existing Science and Innovation Park. This will enable existing firms based in the Park's Innovation Centres to expand and also to accommodate new or incoming high-tech companies to the area, with the potential to significantly increase job numbers, job quality and job choice. However, further growth at Keele is constrained by the Green Belt. The Joint Local Plan presents an opportunity to address this and we are therefore proposing a further 12.5 ha of employment land to the East of the current science and innovation park to provide for its extension.

Quality of Employment Land

- 2.50 The tables below provide a greater breakdown of the employment land supply in both areas by the different types of use, from small industrial units and workshops (B1b/c) to large factories (B2) and distribution warehouses (B8). For committed sites, the breakdown of the overall site area has been applied in accordance with the approved plans for each site. For the preferred employment sites the Employment Land Review (2015) recommendations for the use classes to be accommodated on each site have been applied.

Table 3 – Committed Employment Land (Hectares)

	B1a	B1b	B1c	B2	B8	Total:
Stoke-on-Trent	1.91	0.19	13.45	16.59	55.26	87.41
Newcastle-under-Lyme	3.42	2.25	3.35	5.65	13.92	28.59
Total	5.33	2.44	16.8	22.24	69.18	116
Percentage	4.5%	2%	14.5%	19%	60%	100%

Table 4 – Preferred Employment Land (Hectares)

	B1a	B1b	B1c	B2	B8	Total:
Stoke-on-Trent	1.54	4.38	17.9	9.56	9.43	42.81
Newcastle-under-Lyme	0.74	25.44	0.74	1.51	1.51	29.94
Total	2.28	29.82	18.64	11.07	10.94	72.75
Percentage	3%	41%	26%	15%	15%	100%

- 2.51 The tables above show that the greatest proportion of committed employment land (i.e. has planning permission) is for B8 (warehousing and distribution) uses, followed by B2 (general industrial) and B1c (light industrial) uses. The greatest proportion of the preferred employment sites (i.e. new sites) are recommended for B1b (research and development) use, followed by B1c

(light industrial) then B2 (general industrial) and B8 (warehousing and distribution) uses.

- 2.52 The Employment Land Review recommends that an appropriate split of the employment requirement is 25% B1a/B1b and 75% B1c/B2/B8. The tables above indicate that the proportion of the total land supply that is committed or recommended for B1a or B1b use is 21%, and the proportion that is committed or recommended for B1c/B2/B8 use is 79%. This preferred employment land supply is therefore in close alignment with the recommended approach set out within the Employment Land Review.
- 2.53 The larger proportion of land preferred for B1b uses reflects the ambition to drive the knowledge based economy with more employment in technology and innovation. Making provision for more knowledge-based businesses will provide high quality and well-paid jobs. This is essential to retain the growing graduate population and the need to attract more young people to move into the area in order to provide a future workforce and address the issue of affordability of house prices created by the low-wage economy.

Summary of findings from the Sustainability Appraisal

- 2.54 As with the overall employment land supply, the potential effects of this preferred option were identified as dependent on implementation. There were more neutral effects identified for this preferred option, particularly against objectives that were location specific, for example the objectives related to enhancing centres, regenerating degraded environments and reducing development within locations at risk of flooding. This reflects that this preferred option relates to the type of employment land and premises proposed, rather than their location which was covered in the previous preferred option. Potential positive effects were identified for objectives related to improved health and mental well-being and the provision of a more equitable society. There was a major potential positive effect identified for providing a range of employment land and premises. There were no significant potential negative effects identified against any of the objectives for this preferred option. Mitigation measures identified to improve the sustainability of this preferred option included aiming to provide jobs suitable for lower income and skilled groups, as well as higher paid and skilled jobs and the increased focus on Research & Development.

Consultation Question:

Do you agree with the preferred option of aiming to achieve the Employment Land Review (2015) recommendations for 25% of the employment land supply to be used for B1a/b uses and 75% for B1c/B2/B8 uses?

Rural Employment

- 2.55 Evidence in the Employment Land Review suggests that the rural economic sectors forecast to incur the largest employment losses include: agriculture; forestry; and mineral working, together with related businesses. The Joint Local Plan can attempt to arrest the social and economic decline that is likely to arise from such job losses by planning for new employment to replace future job losses. It is considered that the most appropriate way to do this is to plan for small-scale employment opportunities and to support rural diversification of uses that are subsidiary to the original use. This does not therefore require large site allocations.
- 2.56 The Employment Land Review states that there is very limited rural business space of any size or volume in the plan area. This suggests that small firms looking for rural business space gravitate towards Shropshire, Stafford, or Staffordshire Moorlands. It is considered that rural diversification, including reusing existing vacant buildings, as opposed to specific site allocations is the most effective way of encouraging new jobs and fostering a living landscape.
- 2.57 However, the opportunity is still available to neighbourhood planning groups in the rural area to propose allocating sites for employment uses if this can be supported by evidence that this will lead to a sustainable pattern of development.
- 2.58 The preferred approach to addressing specific rural industry losses is to prepare a criteria-based policy, which does not allocate land, but takes a positive approach towards rural enterprise. This would continue the approach towards rural employment set out in the Core Spatial Strategy.

Summary of findings from the Sustainability Appraisal

- 2.59 Most of the potential effects identified are dependent on implementation as the potential effect will be determined by the content of the proposed planning policy. In particular, this will need to have regard to conserving, enhancing and promoting interest in the local distinctiveness and the historic environment, strengthening the quality of the landscape, ensuring the provision of associated shopping and commercial services and protecting and enhancing the vitality and viability of village centres. The potential effect against the objective to provide a range of employment land and premises was also dependent on implementation rather than being a potentially positive effect, as the preferred option is to develop a criteria based policy to promote development proposals rather than to identify specific sites and premises. A potential positive effect identified against this objective is again dependent on the content of that criteria based policy.

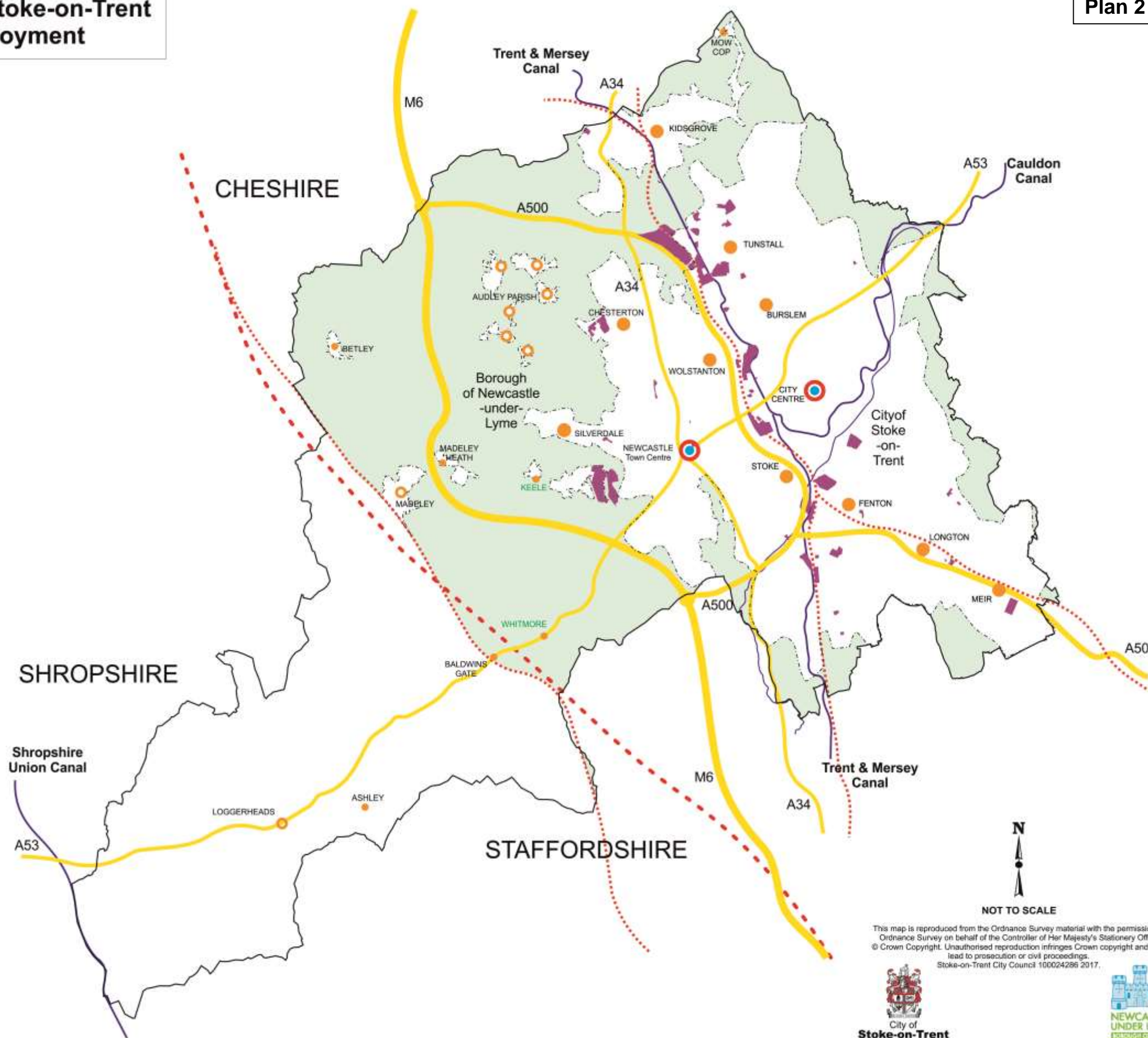
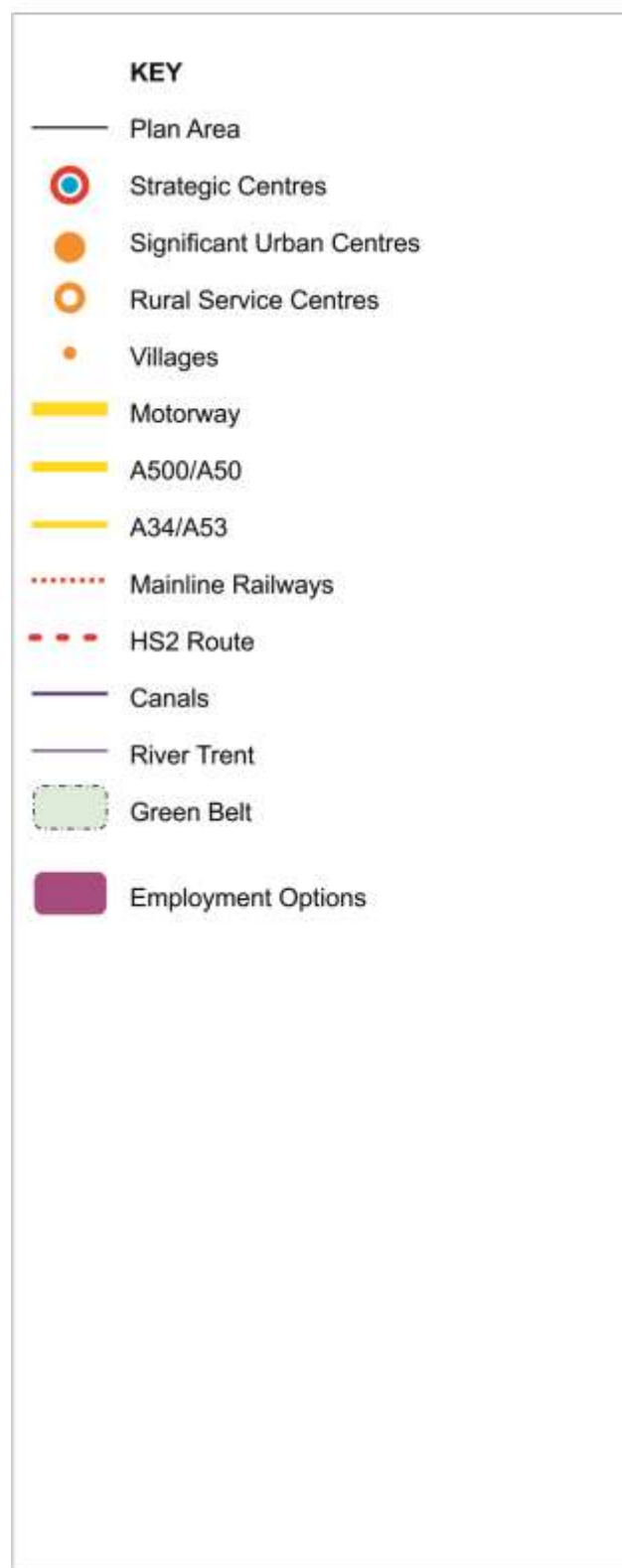
Consultation Question:

Do you agree with the preferred approach to promote new rural employment/enterprise through a criteria based policy?

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Newcastle-under-Lyme and Stoke-on-Trent Joint Local Plan - Employment

Plan 2



NOT TO SCALE

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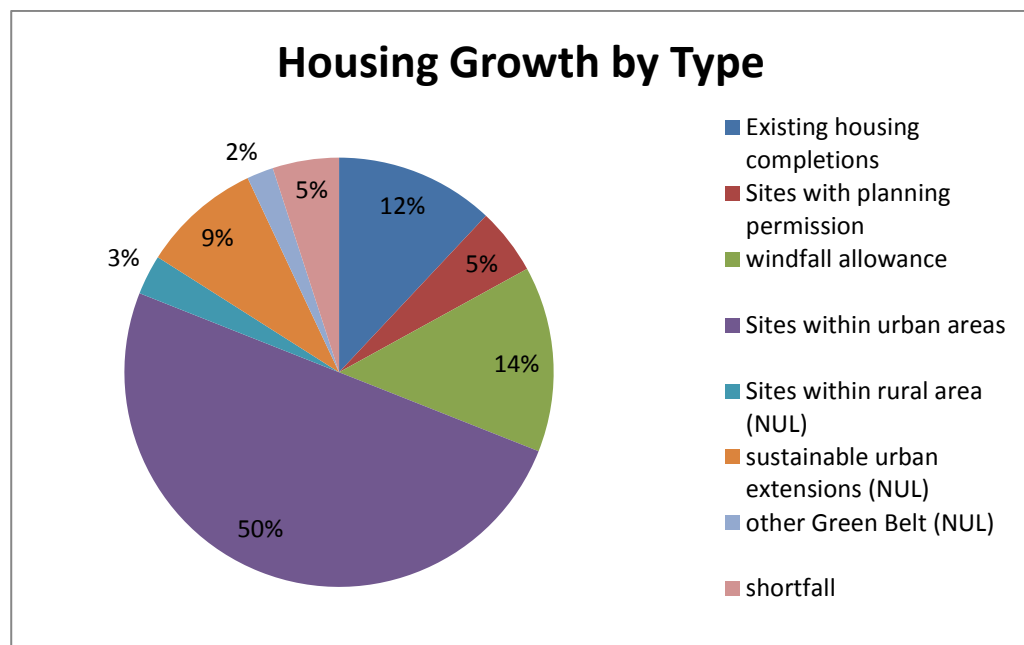
Preferred Spatial Distribution of Housing

Background

- 2.60 The development strategy set out in the Joint Local Plan seeks to deliver aspirational, yet realistic growth in a responsible and sustainable way. This means that the development strategy will be coherent, planned, and will deliver growth over the entire plan period from 2013 to 2033 in a comprehensive and structured way, delivering enough housing of the right type and mix, and in locations to meet the area's needs. The preferred growth scenario having considered the Joint Local Plan evidence base, including representations received at the Issues and Strategic Options consultation stages, is to deliver the Objectively Assessed Need of 27,800 homes in the period 2013 to 2033.
- 2.61 As mentioned in the preferred employment option section of this document, it is the priority of the Joint Local Plan to plan positively for balanced growth to meet the development needs of Newcastle-under-Lyme and Stoke-on-Trent through a sustainable growth strategy. In order to achieve balanced growth the employment and housing sections of this document are closely aligned, particularly as the provision of land for housing and employment is key to support the vision and aim of the area to develop its position as an innovation hub for investment and build upon its reputation as a great place to live, learn and work.
- 2.62 Past development strategies have resulted in prolonged periods in which economic growth has been constrained. A major contributing factor to this has been an under supply of housing, particularly in Newcastle-under-Lyme, which has led to worsening affordability and in turn resulted in increased difficulty for young people to form households. This issue also has implications when it comes to the retention of the area's graduate population. The outward migration of young people and particularly graduates has restricted the area's ability to attract investment in jobs, especially high value jobs for which the area is deficient.
- 2.63 The Employment Land Review (2015) forecasts strong growth in employment across the Joint Local Plan area. However, in order to fulfil the area's economic potential, housing growth, in excess of that which is required to support natural population growth, is necessary to retain and attract more people of working age to address an imbalance in the area's demographic structure and, in doing so, form a locally available workforce that can assist with securing inward investment and raise aspirations through access to housing and employment opportunities.
- 2.64 The Joint Local Plan Strategic Options consultation that preceded this document set out options to accommodate development needs. From the Strategic Options consultation it became clear that Options 1-4 were unable

to provide enough capacity to accommodate the area's development needs, according to the SHMA Review (2017). A preferred spatial strategy has since been developed which represents a hybrid of Strategic Spatial Options 4 and 6. This seeks to maximise development within the wider urban areas, whilst proposing some limited Green Belt releases where it is considered a case for exceptional circumstances can be made.

- 2.65 The following pie chart sets out how this level of growth can be accommodated in accordance with the Joint Local Plan preferred spatial strategy.



- 2.66 Since the start of the plan period (2013), there have already been a number of housing completions (3,315) and this equates to 12% of the requirement.
- 2.67 Local Authorities may make an allowance for windfall sites where evidence demonstrates such sites have consistently become available and will continue to be part of a reliable source of housing supply. There is a recognised delivery of windfall development and an analysis of the type of windfall coming forward – conversions of existing buildings and infill developments – indicates this will continue. Windfall sites, together with other smaller sites with planning permission, will give a supply of 5,530 houses predominantly in Stoke-on-Trent. This accounts for approximately 19% of the requirement.
- 2.68 In selecting sites that are capable of delivering the remaining housing supply requirement, the following strategy has been applied:

Urban Areas and Centres of Newcastle-under-Lyme and Stoke-on-Trent

- 2.69 Sites that support the centres within the urban core of Newcastle-under-Lyme and Stoke-on-Trent that are not significantly affected by constraints to

development have been included in the preferred option as a priority in meeting the regeneration requirements of the plan. These sites will ensure the viability and vitality of the area, whilst ensuring that services are supported and accessible. These sites help to promote sustainable growth and investment in the centres, and lie in close proximity to employment. The nominal capacity from these sites equates to just over 42% of the requirement.

Stoke-on-Trent Wider Urban Area

- 2.70 Given the urban area is wider than just neighbourhoods surrounding the main town centres and that there is a network of smaller local and neighbourhood centres and suburban neighbourhoods within the wider urban area, further sites have been selected from the wider urban area which are in the most sustainable locations for development. This will increase a choice and balance in the market. With all sites that are not significantly affected by constraints to development being included, it allows for a further 8% of the requirement.

Rural Area of Newcastle-under-Lyme

- 2.71 Within the rural area of Newcastle-under-Lyme (strategic area 5) there are several sites that have received planning permission or are considered to be in a suitable location to support the existing settlements. Whilst the rural area does cover a large geographical portion of the area, it hosts a small percentage of the population and benefits from limited infrastructure and access to services, and there is a need to take into account environmental considerations. Excluding the rural area that is featured within strategic area 4 discussed below, sites in this area make up 3% of the requirement.

Newcastle-under-Lyme Western Urban Extensions

- 2.72 In order to support the Joint Local Plan's economic strategy there is a proposal to release land from the Green Belt to the west of Newcastle-under-Lyme centre and create a western urban residential community which includes provision for both academic and non-academic staff in a location that would support strong interface with Keele University (strategic area 4).
- 2.73 It is proposed to create a sustainable settlement based on garden village principles which can capitalise on being so close to a highly-attractive, landscaped campus, science and innovation park. It is considered that this will make a significant contribution to achieve the area's aim of being a UK central hub for innovation and investment. This strategic location would fit with the Joint Local Plan's vision. It could support the provision of highly skilled employment and a choice and range of homes, including affordable homes alongside each other in an attractive location. There is an extra benefit that this will support delivery of the housing and employment requirement.

- 2.74 The sites in this location that have been identified as currently available and could accommodate 11% of the housing requirement. Strategic Areas 4 and 5 have the potential to contribute 14% of the Joint Local Plan housing requirement. Therefore the collective potential contribution from the rural area of Newcastle-under-Lyme equates to 33% of Newcastle-under-Lyme's housing requirement (11,720 dwellings).
- 2.75 In conclusion the housing requirement for each authority is shown in the following table. This identifies that Stoke-on-Trent City Council can demonstrate delivery of 16,892 dwellings against a requirement to provide 16,080 dwellings (105% of their apportionment) and Newcastle-under-Lyme Borough Council can demonstrate delivery of 9,621 dwellings against a requirement to provide 11,720 dwellings (82% of their apportionment) :

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

- 2.76 This leaves an overall shortfall for the plan area of 1,287 dwellings. The Councils options to address this include identifying further sites in Newcastle-under-Lyme Green Belt (where exceptional circumstances can be demonstrated) and/or open countryside, sites in Stoke-on-Trent urban area (subject to viability considerations) and to approach neighbouring local authorities. Any solution to the housing shortfall will need to conform to the Joint Local Plan strategy and in a manner which furthers the objectives in the manner described above.
- 2.77 The Joint Local Plan will positively seek opportunities to provide for the needs of the area's population and it is recognised that housing provision will need to reflect demographic change over the plan-period. For example, the need to retain and attract more residents of a working age (16 – 64) and also account for an anticipated growth in the number of residents aged 65+ (an increase of approximately 30,000 according to 2014-based sub-national population projections (SNPP)). Detailed policies for housing type and mix will be brought forward at the Draft Joint Local Plan stage.

Summary of findings from the Sustainability Appraisal

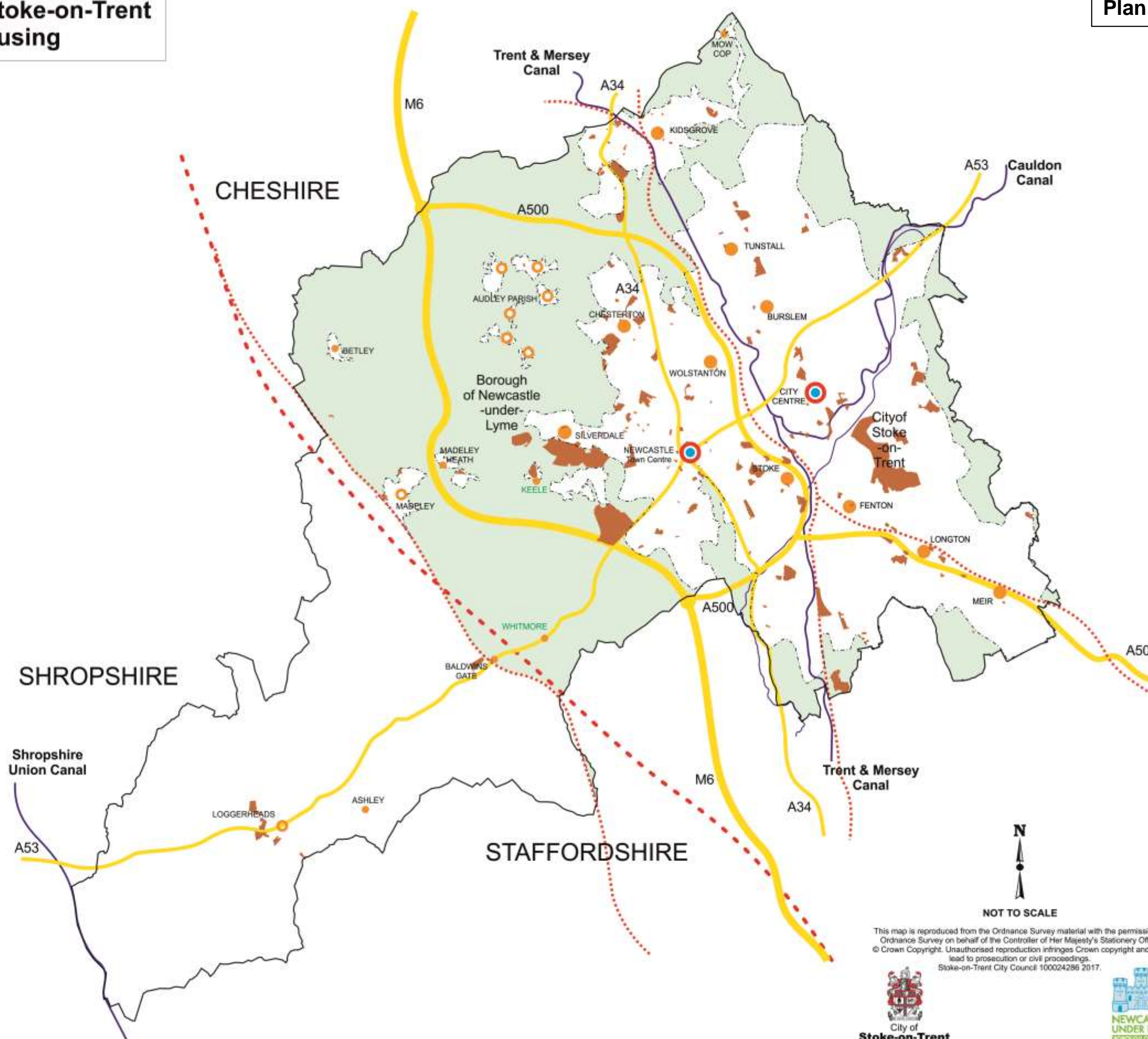
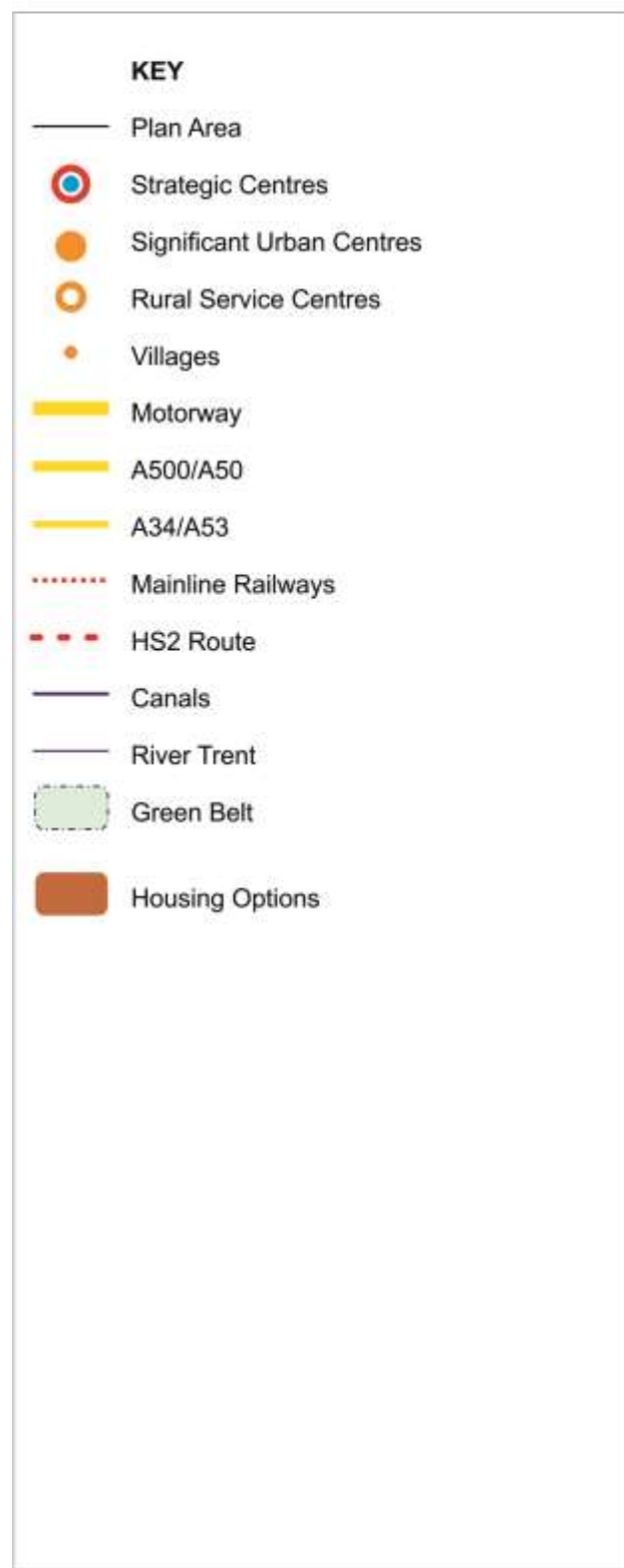
- 2.78 Most of the potential effects that were identified against the objectives were dependent on implementation. There was a major positive potential effect identified against the objective to provide housing choice and help to meet the housing needs of the whole community. Recommended mitigation measures to improve the sustainability of the preferred option focus on the content of planning policies to manage the development of this preferred housing land. This should include planning policies to ensure enhancements to green space, biodiversity, flood risk and drainage, the historic environment, and supporting social and transport infrastructure are enabled through development and that these are not detrimentally impacted on.

Consultation Question:

Do you agree with the preferred option and spatial distribution for the supply of housing?

What would be your preferred approach to address the shortfall of housing and supports the vision and objectives of the Joint Local Plan?

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3.0 Key Strategic Developments

Stoke-on-Trent City Centre and Railway Station

- 3.1 The strategy is based on the strategic principles of supporting our centres and ensuring development is targeted towards the most sustainable locations and supports job growth.
- 3.2 At the heart of Stoke-on-Trent is a city centre to be proud of. The area's principle mainline railway station and Staffordshire University and Stoke-on-Trent College campuses are all within a 1 ½ mile radius of the core city centre. The sustainable regeneration of the city centre and this wider area of influence is therefore an important part of the strategy.
- 3.3 The city looks to continue its sector-led growth to attract new businesses and generate new jobs in the business, professional, arts and culture, retail, tourism and leisure sectors. Growth in these sectors is interlinked and will be driven forward by an increased resident population, in and around the city centre of at least 1,500 residential units, providing additional footfall, spend and vibrancy.

Stoke-on-Trent City Centre

- 3.4 Stoke-on-Trent City Council has an emerging Development and Regeneration Strategic Plan for the City Centre (September 2017). This, alongside the Stoke-on-Trent Station Masterplan, provides the background and evidence of delivery of investment within this core area for the Joint Local Plan.
- 3.5 A wide range of activity has been undertaken to enhance the City Centre over the last few years, and the vision for the refreshed Development and Regeneration Plan seeks to build on the progress that activity has delivered.
- 3.6 Moving forward, further investment is planned for the City Centre and wider area which the Joint Local Plan can provide policy support for including:
- Further public realm improvements;
 - Unity Walks retail and leisure scheme on the former bus station and east and west precincts,
 - Further development at Smithfield including delivery of a 140 bed 4-star hotel for Hilton Garden Inn
 - Improvements to Hanley Indoor Market
 - Additional investments in the cultural quarter around The Potteries Museum and Art Gallery/Regent Theatre and Victoria Hall;
 - Station Gateway improvements – including delivering £14million programme as part of the LEP Growth Deal 2 and City Council funded University Quarter and City Centre Access Programme

- Hanley Park improvements – a £6 million capital investment and HLF grant scheme to improve the historic Hanley Park which is located between the City Centre and Stoke-on-Trent Railway Station
- Delivery of eight residential opportunity sites within and on the edge of the City Centre – these have been designated as Housing Zone sites. All of these sites are within walking distance of the City Centre, and their delivery will ensure a positive impact on its footfall and vibrancy.
- District Heat Network – the Council is establishing a District Heat Network which taps into natural geo-thermal heat sources to provide efficient, sustainable and cost effective fuel supply for domestic and business users. The first phase is being installed from autumn 2017 to autumn 2018 around Staffordshire University.

Summary of findings from the Sustainability Appraisal

- 3.7 Most of the potential effects for this preferred option are dependent on implementation but there are a number of positive potential effects, especially against the social and economic objectives relating to providing housing choice, reducing the need to travel, providing community, leisure, shopping and commercial services, and providing a range of employment land and premises. A major positive potential effect was identified against the objective to protect and enhance the vitality and viability of centres, as this preferred option is focused on enhancing the City Centre. Recommended mitigation measures to improve the sustainability of this preferred option focus on ensuring that the content of appropriate planning policies will manage development in and around the City Centre to ensure that the design and form of development schemes are appropriate and that wider benefits are brought about to green space, heritage, transport, accessibility, the draw of the City Centre for visitors and ensuring that benefits are shared with deprived communities in and around the City Centre. In particular the links between the City Centre and nearby focal locations should be enhanced, for example Hanley Park, Central Forest Park, Stoke-on-Trent Railway Station, Etruria Valley and Festival Park.

Consultation Question

Do you agree with the regeneration approach for the Stoke-on-Trent City Centre (Hanley)? If not what changes would you make?

Stoke-on-Trent Railway Station

- 3.8 As set out above Stoke-on-Trent Railway Station is a key gateway into the city and the excellent communications are a critical asset in the area's economic aspirations. The station is on the Stafford to Manchester Piccadilly branch of the West Coast Main Line and is also on the Crewe to Derby line. Improving linkages to the city centre and encouraging investment in and around the station is an important part of the Joint Local Plan Strategy as it was within the previous Core Spatial Strategy (2009).
- 3.9 With housing and employment growth, footfall and demand for connectivity will grow. The station needs to cope with that change in terms of capacity both for rail services/operations and the ability to get people to and from this hub in an effective manner. The City Council has commissioned a Stoke-on-Trent Station Masterplan (framework strategy) which considers key land uses appropriate within and adjacent to the station buildings.
- 3.10 It is proposed to create a mixed use development area around the station with policies set out within the plan which will outline the acceptable land uses, including some limited town centre uses, which will be acceptable within this area. This will not only support the sustainable use of the railway station but also support the adjacent University Quarter. This will be considered further within the Draft Joint Local Plan.

Summary of findings from the Sustainability Appraisal

- 3.11 This preferred option achieved potentially positive effects against most of the social and economic objectives. In particular there were major positive potential effects identified against the objectives to reduce the need to travel, increase transport choice and accessibility and to increase the use of public transport. The potential effects against these objectives are a direct result of the proposal to develop the area around Stoke-on-Trent Railway station, which should increase the range of uses in the area and increase the activity and use of this major transport hub. Recommended measures to maximise these positive effects were to ensure that the station and associated transport infrastructure are able to accommodate the increased demand generated from intensified use and activity in the area and to ensure that any main town centre uses that are developed in this location are not to the detriment of Stoke Town Centre. There was more uncertainty against environmental objectives, with many potential effects depending on how development is implemented, in particular with regard to the objectives to adapt to a changing climate, improve air quality, reduce the amount of development at risk of flooding and enhancing the quality and accessibility of green space. There were potential positive effects identified against the objectives to conserve and enhance the historic environment and assets due to the presence of listed buildings and conservation areas, these potential effects could be identified as a major positive if the reuse of historic buildings and assets and developments within their setting are undertaken in a sympathetic way.

Consultation Question

Do you agree with supporting mixed use development around Stoke-on-Trent Railway Station? If not what changes would you make?

Newcastle Western Urban Extensions (including Keele University)

- 3.12 It is considered that a targeted urban extension to the west of Newcastle in the vicinity of Keele University campus and Science and Innovation Park will not only contribute to the most sustainable pattern of development but will also strive to strengthen key knowledge based employment sectors creating a more diverse economy and improving the rate of graduate retention. This is essential if we are to succeed in transforming the low-skill nature of the sub-regional economy and regenerating the local housing market. It also provides a once-in-a-generation opportunity to create a unique synergy between housing and employment.

The Case for Exceptional Circumstance at Keele

- 3.13 Keele University is one of the UK's top-ranked universities, and together with its Science and Innovation Park is one of North Staffordshire's genuine motors for economic growth, making a major contribution to the educational, economic and social wellbeing of the plan area. The Science Park with its collaborative links to the University, fosters the creation of high value jobs in innovative industries. This growth has taken place in spite of the fact that historically the plan area has struggled to match levels of national economic performance particularly in relation to well paid, skilled jobs.
- 3.14 The contribution that Keele University and Science Park makes to the local economy was previously recognised within the Core Spatial Strategy and more recently in the Employment Land Review 2015. Overall the university currently contributes £125 million per year into the local economy and supports around 3,400 FTE jobs in Stoke-on-Trent and Newcastle, including 1,750 directly, 350 through its supply chain, 440 from staff and student spending in the local area and a further 810 working for firms based at the Science Park (source: Regeneris Consulting). The University has ambitious plans for further growth, through the recently announced 'New Keele Deal' a £70 million investment plan it has drawn up with the Staffordshire and Stoke-on-Trent Local Economic Partnership (LEP), the local authorities and the NHS, to generate higher value employment and economic growth by using the University's world leading research and development facilities to create jobs and support businesses to grow.
- 3.15 In order to provide for the University's growth ambitions and bolster its role as a centre of excellence, research, teaching and scholarship and boost

innovation-led high value employment growth new housing will be required to accommodate the needs of both academic and non-academic staff, research staff and those working at the science and business park. The preferred approach for housing at this location, rather than at alternative sites across the HMA, is primarily a result of the unique opportunity that exists to form a new community where housing and employment growth is directly aligned. It would also make a significant contribution to the borough's unmet housing need and work to demonstrate that opportunities have been positively sought to meet the borough's development needs, as required by national policy. Further information and justification is contained in the Housing and Green Belt technical papers.

- 3.16 Furthermore, Keele presents a location-specific opportunity to target knowledge-economy/research & development-based businesses, through the expansion of the existing Science and Business Park. This will enable existing firms based in the Park's Innovation Centres to expand and also to accommodate new or incoming high tech companies to the area with the potential to significantly increase job numbers, job quality and job choice. Regeneris Consulting estimate that, as a result of these growth plans when combined with the university's ongoing redevelopment of the existing campus, the total quantifiable economic contribution of the University and Science Park will have doubled to over 7,000 FTE jobs by 2040. Not to capitalise on these achievements would be an unsound strategy in the view of both Councils.
- 3.17 Evidence from the SHLAA identifies the opportunity to capitalise on a cluster of available greenfield sites within the Green Belt to the north, east and south east of the university to create a residential community in a location that would support strong interface with the University. Collectively the sites have sufficient capacity to provide housing to both support the growth of the university and contribute a significant amount of homes towards Newcastle's housing requirement, including making provision for a variety of family and affordable housing. The latter is necessary to help retain graduates from Keele and encourage them to take up employment opportunities locally. A comparison study of the other sites within the HMA has been undertaken, and this opportunity doesn't exist elsewhere.
- 3.18 If land is not allocated to support the expansion of Keele University, or constrained due to the availability of housing, which in terms of its location and type of housing on offer isn't attractive enough to an expanding university and business park workforce then there is a risk that it will be difficult to attract and retain staff capable of maintaining the university's position as a centre of excellence. This could have the consequence that it will not be able to compete with other universities of a similar high rank.
- 3.19 As well as supporting the aspirations of the university and contributing towards the area's need, housing in this location is also supported by the

findings of an accessibility study undertaken by Staffordshire County Council¹. The study found that, across the borough's rural area, the locations with greatest accessibility to existing employment are along the A53, adjacent to the urban area, and the A525, including Keele. Also, housing close to new employment opportunities, particularly for knowledge based employment which are often workforce-hungry compared to other forms of employment uses, has clear advantages in terms of sustainability by further reducing the need for travel. Currently, many of those working at the university in academic roles are known to commute from Cheshire and Shropshire. Therefore, there is considered to be significant benefits of housing at this location particularly due to: the availability of existing infrastructure (for example to integrate with existing public transport systems), and the reduced risks associated with the provision of the necessary infrastructure investment through a single large-scale development scheme.

- 3.20 New housing, adjacent to an extended campus, and science and business park would be in keeping with the University's original vision of a people's university in which a community might live, work, and learn together², as well as being good planning practice towards ensuring that the local economy and living environments are fit for the 21st century. The intention is to consider development in accordance with garden village principles.
- 3.21 It would not be possible to reproduce this form of development anywhere else in North Staffordshire, since nowhere else has the co-location and critical mass of university faculties, the concentration of knowledge-based industries and the potential for a residential environment of the highest standard. This would make a very important contribution to the need to help grow the knowledge and skills of local people, particularly a future economically-active workforce, helping them to access good-quality well-paid jobs, as well as enhance the overall offer and competitiveness of the plan area.
- 3.22 The selection of this preferred approach is also considered appropriate in light of missed opportunities and undesirable consequences resulting from past growth strategies of other local authorities, with research and development based employment attached to universities, which were later found to be to the detriment of the environment and economy. For example, in Cambridge, the local authority's pre-millennia economic strategy to support the university's role in knowledge-based industries resulted in employment growth being focused in and around Cambridge. However as this growth was not aligned with the area's housing growth which was directed beyond the Green Belt boundary, the strategy increased the need to travel, harming the environment, people and business. Cambridge, in its subsequent plans, has

attempted to address the negative impacts resulting from the imbalance between the distribution of homes and jobs in the city. Ultimately this resulted in a number of targeted releases of Green Belt land, through the Local Plan process, on the edge of the city that are predominantly residential led

Masterplan

- 3.23 Evidence from the SHLAA identifies three sites as available at this location, with the potential to become allocated for residential development (SP11, KL14 and TB19), but a masterplan is required to investigate in more detail the potential of this location to support the development of approximately 2,500 houses, identify specific infrastructure requirements and how this could successfully be integrated with a 12.5 ha expansion of the Science and Innovation park as well as highly sensitive landscapes, such as the Grade II Registered Historic Park and Garden at Keele and ancient woodland. The Borough Council, in partnership with Staffordshire County Council and Keele University, have commissioned consultants to prepare such a masterplan. Once a draft masterplan has been prepared this will be subject to a separate stakeholder consultation in 2018 and used to inform later stages of the Joint Local Plan.
- 3.24 Appropriate master-planning would help create co-located working and living environments to create a unique community of housing, open space, social infrastructure, education and employment as a sustainable form of development. The new community would also have excellent access to high-quality sports and recreation facilities at the university campus thereby promoting healthy lifestyles and would easily be able to access a wide range of services and facilities within Newcastle Town Centre, which is extremely well connected by public transport.
- 3.25 Such a development also presents an opportunity to consider providing high quality employment and high quality housing on 'garden settlement' principles where land value capture provides an income stream to meet the costs of the necessary infrastructure investment and for the long-term stewardship of shared assets.

Summary of findings from the Sustainability Appraisal

- 3.26 Most of the potential effects identified against the objectives are dependent on implementation. There were positive potential effects identified against the objectives to provide housing choice and a range of employment land and premises. There was also a minor negative potential effect identified against the objective to ensure that there is an overall net gain in the extent and quality of biodiversity. This is because of the loss of existing natural features in the area and close proximity of Ancient Woodland. The recommended

mitigation measures to improve the sustainability of the preferred option include ensuring that relevant planning policies and the allocation of land for development in this location address potential impacts and seek to achieve an overall improvement to biodiversity, as well as bringing about improvements to landscape, open space, community services and facilities and transport infrastructure.

Consultation Question

Do you agree with the targeted Green Belt release at Keele to support the provision of a sustainable urban extension?

Berryhill

- 3.27 Berryhill is the second largest preferred site in the Joint Local Plan, and helps to ensure a range of sites are identified to meet the housing requirement within Stoke-on-Trent. By containing the site within the Local Plan it gives the Council, and its developer partners an opportunity to help guide any development, ensuring that a well-designed residential development is delivered.
- 3.28 The area around Berryhill is a very important part of the landscape character within the City, being visible from various view points across the City, and provides an informal recreation resource for local residents. The area is of historical and ecological value, containing important archaeological remains and a number of wildlife habitats. Years of historic mineral working have created a somewhat degraded landscape and the site is largely under used. However, due to its location and size, has the potential to deliver pockets of residential development and large regeneration benefits to the City with very high quality sustainable "garden neighbourhoods" at the heart of Stoke-on-Trent.
- 3.29 Residential development pockets could be supported by a comprehensive green infrastructure, improving quality of and opening access to the remaining green space. Any development has the potential to connect and provide enhancements to the adjacent and established Berryhill Fields Nature Reserve, and across to Fenton Park. There is an opportunity to create a Local Centre with retail and community uses, supporting future and current residents. With a wide range of employment opportunities on the edge of the site, two employment estates and being close to the city centre, the site is a sustainable location delivering homes next to jobs. Therefore the development of the site would deliver a truly mixed-use site. However, allocating the site for development does not mean it will all be built upon and

areas will continue to be protected for open space – this will be reflected in the masterplan for the strategic site and associated policy within the Draft Joint Local Plan.

- 3.30 The delivery of the site also has wider benefits, it has been an aspiration to deliver the Hanley-Bentilee link road now for some time, relieving highways congestion and providing sustainable transport infrastructure across the City. The delivery of Berryhill will contribute to the unlocking of this key piece of infrastructure, which will in turn deliver benefits across the City. It will also unlock further parcels of land for development with several currently constrained due to highways issues.

Summary of findings from the Sustainability Appraisal

- 3.31 Most of the potential effects identified against the objectives are dependent on implementation. There are also a small number of objectives where both positive and negative potential effects were identified. The negative potential effects were identified against the objectives to ensure an overall net gain in the extent and quality of biodiversity, the quality of the landscape and city townscape, local distinctiveness and to maintain and enhance the quality and accessibility of green space. These negative potential effects were identified due to the recognition within the preferred option that Berryhill has existing landscape, ecological and green space value. There are however enhancements that can be to these objectives through appropriate planning policies, designations and allocations to ensure that development within Berry Hill is implemented in a sensitive way. A major positive potential effect was identified against the objective to provide housing choice and help to meet the housing needs of the whole community.

Consultation Question:

Do you agree with the identification of this site for a housing - led mixed use regeneration scheme?

4.0 Green Belt

- 4.1 The urban area of Newcastle-under-Lyme and Stoke-on-Trent is tightly bound by Green Belt. This policy designation is designed to prevent urban sprawl by keeping land permanently open, by protecting them from inappropriate development pressures. In particular, national planning policy makes it clear that development such as housing and employment uses are inappropriate in these locations, except in very special circumstances.

- 4.2 The NPPF also states that 'once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan.' A Green Belt Assessment has been undertaken on behalf of the Councils, this showed that all areas provided some contribution to Green Belt purposes; however these were at a variety of levels ranging from weak to strong.
- 4.3 Within Stoke-on-Trent it is not considered justifiable to go into the Green Belt for the delivery of sustainable development as the current requirements can be met within the City Council's urban area. However it is considered that some very minor amendments to the boundaries within Stoke-on-Trent may be required to align the Green Belt boundary with the latest Ordnance Survey base and technological advancement in mapping. This will be set out at the Draft Joint Local Plan stage.
- 4.4 Within Newcastle-under-Lyme it is considered to be a strong case for amending the Green Belt boundary to ensure the objectives of the Joint Local Plan can be achieved. While not an exhaustive list, the principal factors that the Borough Council consider capable of amounting to "exceptional circumstances" and would therefore justify amendment to the Green Belt boundary are:
- Newcastle-under-Lyme's Housing Need.
 - Newcastle-under-Lyme's House Prices & Affordability Issues.
 - Newcastle-under-Lyme's Affordable Housing Need.
 - Establishing a demographic balance to support identified employment growth.
 - Providing higher value jobs within the Plan area and taking advantage of the socio-economic benefits of the success of Keele, whilst seeking to retain and attract graduates and encouraging greater embryonic business creation.
- 4.5 Having set out factors to support the release of land from the Green Belt a site selection process is set out in the Green Belt Technical Paper. The Green Belt locations where development need is proposed to be directed would effectively serve to increase the Joint Local Plan area's land supply. Sites were assessed according to their suitability, availability and achievability, along with consideration to the extent to which their release would address the factors listed above. The primary objective in identifying the most appropriate sites is influenced by the requirement to achieve a sustainable pattern of development, proximity to major urban area and alongside transport interchanges, corridors and beside major existing centres to access and support facilities and services. It is the sustainability benefits associated with potential Green Belt release which must on-balance outweigh harm to the Green Belt.
- 4.6 In proposing development within the Green Belt the Councils are committed to ensuring the overall integrity of the Green Belt is maintained whilst also

contributing to the area's housing and employment requirements, where exceptional circumstances can be demonstrated.

Summary of findings from the Sustainability Appraisal

- 4.7 Most of the potential effects identified against the objectives are dependent on implementation and depend on which areas are released from the Green Belt and how their future use is managed. There are potential positive effects identified against the objectives to provide housing choice and a range of employment land and premises, as these are given as the main drivers of release from the Green Belt under the preferred option. There was one minor negative potential effect identified against the objective to strengthen the quality of the landscape and townscape, which reflects that the release of land from the Green Belt is likely to have a subsequent effect on openness. Mitigation measures to address this will be to ensure that any future development on land that is released makes an overall enhancement to landscape and townscape.

Consultation Question:

Do you agree with the approach to amend the Green Belt boundary in Newcastle-under-Lyme to support employment and housing needs?

5.0 City, Town and Other Centres

Background

- 5.1 The Joint Local Plan Issues Consultation document identified that one of the most distinctive features of the plan area is that it is polycentric, having developed as a series of places with a number of highly distinctive centres. A hierarchy of centres has developed and this has been reinforced by previous Development Plans.
- 5.2 The preferred strategy recognises that centres are at the heart of their communities and one of the core aims of the Joint Local Plan is to support the vitality and viability of these centres by defining a network and hierarchy that not only recognises their current scale and facilities but also supports future economic changes in the area.
- 5.3 The network of centres in our area have individual different roles across the plan area. The Joint Local Plan will identify a hierarchy of centres which reflects the needs of the community each centre serves. Larger centres across the area fulfil a regional and sub-regional role and support growth,

attract visitors; investment and jobs for the long term future and prosperity of the plan area. Smaller centres provide a more localised role, supporting neighbourhoods and providing shops and services in sustainable locations.

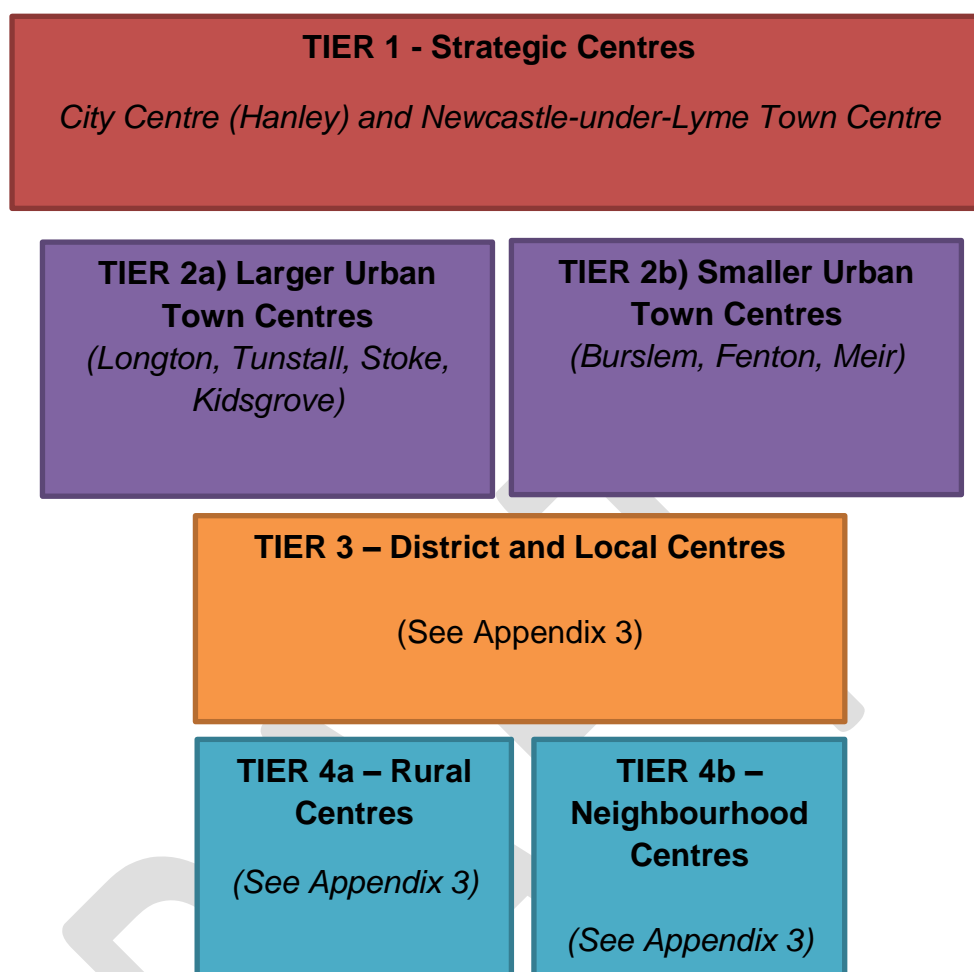
Revised Aims and Objectives

- 5.4 As a result of previous consultations, we have refined the aims and objectives with regard to our city, town and other centres. These are:
- To grow and strengthen the strategic roles of Stoke-on-Trent City Centre and Newcastle Town Centre - to attract more visitors to the area and to support new employment opportunities and job growth
 - To promote appropriate growth and investment in a distinct network of larger towns, sustainable villages and local urban and rural centres across the plan area.
- 5.5 The centres within the plan area are recognised as being at the heart of our communities. Those who visit for shopping and leisure are vitally important to the maintaining the viability of our centres and helping to support job growth and work opportunities for the local community. The Joint Local Plan will seek to make sure that we are encouraging competitive city and town centres that provide customer choice and a diverse retail offer at an appropriate scale, reflecting the individuality of each centre.

Preferred Strategy

- 5.6 As set out above the Council's preferred strategy is to support a centres first approach within the urban area.
- 5.7 In order to ensure that the plan can address the aims and objectives for the plan with regard to centres and that these centres are in the right locations to accommodate an appropriate level of development to meet this strategy the follow revised hierarchy of centres is proposed:

Hierarchy of Centres



Justification

Tier 1 - Strategic Centres

These centres perform a primary role at regional and sub regional level. They are the primary focus for major retail development and uses, attracting large numbers of people to cultural, tourist, social and community venues.

- **Stoke-on-Trent City Centre (Hanley)** is identified as the largest retail destination in North Staffordshire and South Cheshire and performs a primary role at a regional and sub-regional level in attracting visitors to the area. The City Centre incorporates a number of large scale convenience and comparison shops, multiplex cinema, nationally renowned theatres, restaurants and bars. The City Council is taking a pro-active approach to supporting and facilitating growth within Stoke-on-Trent City Centre. This includes facilitating a number of city centre projects including a major cinema and leisure extension at the Intu Shopping Centre and redevelopment of the former East and West Shopping Centre precinct. The City Council is also applying for funding to support the setting up of a Business Improvement District. Specific policies within the Joint Local

Plan will set out the regeneration plans for Stoke-on-Trent City Centre and how new investment in the City Centre can help support its growth and development (as set out in the Stoke-on-Trent City Centre and Railway Station section).

- **Newcastle-under-Lyme Town Centre** provides an important local and sub regional retail centre and has a full range of town centre uses within a compact pedestrianised shopping area. The town benefits from its close connections to Keele University and has a range of convenience and comparison shops, daily market stall, multiplex cinema, restaurants, bars and leisure uses. Recent developments include Castle House, a public services hub, student accommodation within the town centre including change of use and new build. Further regeneration is planned within the town centre at the Ryecroft site.

Tier 2a - Larger Urban Town Centres

These centres provide a complementary role to the two strategic centres, providing retail and other services to their catchment areas.

- **Longton town centre** is identified as the third largest retail centre in North Staffordshire serving the southern part of the urban area and has had recent expansion to the west of the town centre and includes large scale convenience shopping covering a wide catchment area.
- **Tunstall town centre** is identified as serving a wide catchment to the north of the urban area and has had expansions to the south and east of the town centre and includes large scale convenience shopping covering a wide catchment area.
- **Stoke town centre** is identified as playing a number of key roles as the city's administrative centre, supporting the nearby Staffordshire University and is an important destination for ceramics factory shopping, as well as providing local convenience.
- **Kidsgrove town centre** is the second largest town within the Borough of Newcastle-under-Lyme and provides an important local centre, with a range of comparison and convenience shops and local and public services.

Tier 2b - Smaller Urban Town Centres

These centres provide a complimentary role to the two strategic centres, providing retail and other services to their local areas.

- **Burslem town centre** is identified as historically being at the heart of the region's ceramics industry and plays a key role as a historical and cultural destination as well as providing local convenience shopping and services.
- **Fenton town centre** is identified as a town centre due to its historic role rather than its retailing provision which is more characteristic of providing local convenience shopping and services.

- **Meir centre** is identified as providing the eastern gateway of Stoke-on-Trent and serving a small localised catchment in the surrounding communities.

Tier 3 - District and Local Centres

These centres provide a range of retail, other services, leisure and community facilities, the scale of which relate to the catchment area they serve.

- Within Newcastle-under-Lyme there are three district centres which perform an important local shopping function for convenience and top-up shopping. These are Wolstanton, Chesterton and Silverdale.
- Following a review of local urban centres within Stoke-on-Trent these have been reclassified and are identified in Appendix 3. There are 15 local centres with Stoke-on-Trent. These centres perform an important local shopping function for convenience and top- up shopping.

Tier 4a –Rural Centres

- Within Newcastle-under-Lyme these centres provide a hub of services for local residents. The retention of services within these centres is important to ensure that the sustainability of these centres and the communities that they serve is maintained. These centres are Loggerheads, Madeley, Audley, Baldwins Gate and Halmer End.

Tier 4b – Neighbourhood Centres

These centres provide a supporting role to the local community in which they are located. Following a review of neighbourhood centres with Stoke-on-Trent these have been reclassified and are identified in Appendix 3. There are 36 Neighbourhood Centres, which are considered important to include within the hierarchy as providing a support network to housing estates and neighbourhood areas but are smaller in scale than the Tier 4 urban local centres.

Summary of findings from the Sustainability Appraisal

- 5.8 This preferred option has a range of potentially positive effects. Most of these are minor potential positive effects identified against the objectives to conserve promote and enhance local distinctiveness, the historic environment and assets, strengthening the quality of landscape and townscape, regenerating degraded environments, the provision of community and leisure services, improving health and mental wellbeing, reducing the need to travel and increasing the use of public transport. There was a major potential positive effect identified against the objective to protect and enhance the vitality and viability of centres as this is the most relevant objective to this

preferred option. Mitigation measures to improve the sustainability of this preferred option are mainly focused on ensuring that there are a range of services and facilities available in each centre that are appropriate to the size of that centre and its place in the hierarchy, and that these services and facilities are accessible to both existing and new residents and communities across the plan area.

Consultation Question

Do you agree with this hierarchy of centres? If not what changes would you make?

Centre Boundaries

- 5.9 For Stoke-on-Trent previous development plan documents including the saved policies of the City Plan 2001 and the Core Spatial Strategy LDF proposals plan identified the town centre boundaries for each of the centres within Stoke-on-Trent. The boundaries for the centres have been reviewed and changes to existing boundaries are proposed for Stoke City Centre, Longton Town Centre, Stoke Town Centre and Tunstall Town Centre. The revised town centre boundaries are identified on the character area plans.
- 5.10 For Newcastle-under-Lyme, previous development plan documents including the saved policies of the Newcastle-under-Lyme Local Plan 2011 and the Core Spatial Strategy LDF proposals map identified the extent of Kidsgrove Town Centre and the District Centres of Chesterton, Silverdale and Wolstanton. The town centre boundary for Newcastle-under-Lyme was not defined. A retail and leisure study will be commissioned in 2018 and this will inform the draft plan and proposals map.
- 5.11 Newcastle-under-Lyme – the town centre boundary is not defined but is generally recognised as the area within the ring road where retail is the primary activity. This is the same boundary as the Primary Shopping Area where the ring road forms an identifiable boundary. We are proposing to set the Town Centre boundary as the definable ring road in-line with the Primary Shopping Area. Setting the Town Centre boundary as the ring road provides a strong boundary to contain main town centre uses. Edge of centre sites would then only be considered for town centre uses where that development could not be accommodated within the ring road.

Justification

Stoke-on-Trent

The boundaries have been amended as follows:

Stoke-on-Trent City Centre – the city centre boundary is recommended to be extended to include Tesco Extra on Clough Street and the Sainsbury's on Etruria Road. It is also recommended that the casino on Etruria Road, as a main town centre use is also included as is the Premier Inn on the corner of Clough Street and Etruria Road. The revised boundary also includes the large format stores at Century Retail Park within the boundary and follows the Potteries Way extension.

Longton – the boundary has been extended to cover Longton Retail Park to the west as far as including Next, Argos and Tesco. Stores to the west of this area, including Phoenix Retail Park, are considered to fulfil an out of town shopping function.

Stoke Town – the town centre boundary has been extended to the north to include the former Spode factory building to encourage investment in the town centre and to provide a more legible boundary allowing better linkages with Church Street and Campbell Place. The proposed boundary has also been extended to the south to include the Sainsbury's supermarket which forms part of the town centre offer.

Tunstall – the town centre boundary has been extended to the south to include the Asda store, Tunstall Community Centre and units at Jaspers Square.

In terms of other centres the town centre boundaries are considered appropriate as they are and it is proposed to take these forward into the Joint Local Plan.

Newcastle-under-Lyme

Set the town centre boundary as the ring road which would provide a strong boundary to contain main town centre uses.

Summary of findings from the Sustainability Appraisal

- 5.12 Most of the potential effects are dependent on how this preferred option will be implemented, but there are also some notable positive effects. In particular there is a major potential positive effect identified against the objective to protect and enhance the vitality and viability of centres but there are also minor potential positive effects identified against the objectives to strengthen the quality of landscape and townscape, regenerate degraded environments and the provision of community, leisure, shopping and commercial services. Recommended mitigation measures to improve the sustainability of this preferred option largely depend on the content and focus of proposed policies to manage the types of uses to be accommodated within the boundaries and ensuring that there are no detrimental impacts on the historic and cultural environment and assets or on the distinctive landscape and townscape of the centres and their surrounding areas.

Consultation Question

Do you agree with the revised definition of town centre boundaries for Stoke-on-Trent and Newcastle-under-Lyme? If not what further changes would you make?

Key Strategic Sites for retail and leisure provision within centres

- 5.13 Key strategic sites are identified on the character area plans for retail and leisure schemes which will support the preferred strategy for the area and the future prosperity, vitality and viability of the area. An assessment of retail capacity for each of the centres will be undertaken following this consultation to take account of the Joint Local Plan population changes and distribution around the centres. Policies will be set out within the draft plan to bring these key strategic sites forward for mixed town centre uses. These key strategic sites are:

Tier 1 Centre sites:

- Unity Walks, Stoke-on-Trent City Centre
- The Hive, Stoke-on-Trent City Centre
- Town Road, Stoke-on-Trent City Centre
- Ryecroft, Newcastle-under-Lyme Town Centre

Tier 2 Centre sites:

- Longton Exchange Shopping Precinct
- The Strand/Commercial Street, Longton
- The former Spode site, Stoke Town
- High Street/Williamson Street, Tunstall
- The former Market Hall, Burslem
- City Road, Fenton

Summary of findings from the Sustainability Appraisal

- 5.14 Most of the potential effects are dependent on how this preferred option will be implemented, however there are some potentially positive effects identified against the objectives for the provision of community, leisure, shopping and commercial services and the objective to protect and enhance the vitality and viability of centres. Recommended mitigation measures to improve the sustainability of this preferred option are largely focused on the design and form of development on these strategic sites, to ensure that heritage, landscape, townscape, public realm and transport and accessibility links are enhanced and adversely impacted on. The recommendations also include an emphasis on ensuring that the development of these strategic sites encourages a greater range of activities and uses in their centres and that these take place throughout the daytime and evening to encourage more people to visit.

Consultation Question

Do you agree with the list of strategic sites for retail and leisure provision? If not what further changes would you make?

Out of Town Shopping

5.15 It is recognised that there are a number of existing out of town shopping centres that are already providing a shopping and leisure role within our area in a contained retail park or area. Whilst the strategy is not to expand upon these areas and therefore to avoid harm to the hierarchy of centres, the plan needs to recognise their existence and the role that they play in providing for large scale retail and leisure uses which cannot always be accommodated in-centre. These areas are identified on the character area plans as complementary retail destinations to the centres. Policies will be set out within the draft plan to ensure they remain complementary to, and not compete with, the above hierarchy of centres:

- Wolstanton Retail Park, Newcastle
- Freeport, Talke
- Springfield's Retail Park, Trent Vale
- Festival Park, Hanley
- Octagon Retail Park, Hanley
- Alexandra Retail Park, Tunstall
- Phoenix Retail Park, Longton
- Victoria Road, Fenton

Summary of findings from the Sustainability Appraisal

5.16 There were a range of potential effects identified against the objectives for this preferred option. Many were neutral or dependent on implementation but there were also two positive potential effects identified against the objectives relating to enabling access to the widest range of shopping and commercial services and to protect and enhance the vitality and viability of centres. The reasons for these potential positive effects were because the preferred option recognises the existing retail and service provision in out of centre locations but seeks to restrict their further expansion in the interest of focusing development towards the city and town centres. However this is dependent on the centre capacities mentioned above. Recommended mitigation measures to improve the sustainability of this preferred option include ensuring that these locations are accessible using a range of transport modes, that the design of future redevelopment within these existing out of centre locations has a positive impact on landscape, townscape and access to green space and wider services and facilities.

Consultation Question

Do you agree with the approach to out of town shopping locations? If not what further changes would you make?

Retail Impact Threshold

- 5.17 In accordance with best practice, it is appropriate to identify thresholds for proposed developments outside of centre boundaries which should be subject to an impact assessment. This will assess the potential impact of proposed retail development upon existing town centres.
- 5.18 It is the intention to develop a policy within the Joint Local Plan for an impact threshold which will be applied to developments in the different tiers of centres:
- **For Tier 1 centres** it is recommended that development proposals providing greater than 1,500 sq m gross floorspace for main town centre uses in an edge or out-of-centre location should be the subject of an impact assessment.
 - **For Tier 2a centres** it is recommended that development proposals providing greater than 1,000sq m gross floorspace for main town centre uses.
 - **For Tier 2b centres and below** it is recommended that development proposals providing greater than 300sq m gross floorspace for main town centre uses.

Justification

The proposed thresholds at city, town, district and local centre level are considered to reflect the relatively small size of some of the centres at the lower end of the retail hierarchy and their consequent potential susceptibility to alternative 'out-of-centre' provision. This has been informed by the Stoke-on-Trent Retail and Leisure Study 2015.

Summary of findings from the Sustainability Appraisal

- 5.19 There were a range of potential effects identified against the objectives for this preferred option, most of which were unknown, uncertain or dependent on implementation. There were some positive potential effects identified against the objectives to conserve, enhance and promote interest in local distinctiveness, enable access to shopping and commercial services and to protect and enhance the vitality and viability of centres. The latter was identified as having a major potentially positive effect, given that the intention of the preferred option is to have strong policies to restrict the impact of out of centre retail on existing centres. Due to the specific scope of this preferred option, there were limited relevant mitigation measures that can be recommended to improve its sustainability but those that were suggested included ensuring that cumulative impacts of different out of centre development schemes are taken in to account and that the preferred option should seek to support the achievement of an overall range and choice of uses within existing centres.

Consultation Question

Do you agree with the impact thresholds for the different size of centres? If not what further changes would you make?

6.0 Natural and Rural Environment

Landscape and Townscape

- 6.1 One of the core principles in the National Planning Policy Framework is that planning should recognise the intrinsic character and beauty of the countryside. The Joint Local Plan will include strategic policies for the conservation and enhancement of the natural environment, including landscape and the wider countryside. The plan area does not contain any nationally designated landscapes.
- 6.2 At national level the plan area lies within two National Character Areas (NCA) - the Shropshire, Cheshire and the Staffordshire Plain NCA and the Potteries and Churnet Valley NCA. At local level the Planning for Landscape Change Supplementary Planning Guidance, which was adopted in 2001 as Supplementary Planning Guidance to the Staffordshire and Stoke-on-Trent Structure Plan 1996-2011 is relevant evidence. A Landscape Character Assessment (LCA), an update of the Staffordshire Planning for Landscape Change Supplementary Planning Document (SPD), will be prepared to inform the draft plan stage of the Joint Local Plan and complement Natural England's National Character Area profiles. The landscape character assessment will identify and describe variation in the character of the landscape. It will explain the unique combination of elements and features that make landscapes distinctive by mapping and describing character types and areas. They will also show how the landscape is perceived, experienced and valued by people. This will help us understand the character and local distinctiveness of the landscape and identify the features that give it a sense of place. It will help to inform, plan and manage change.
- 6.3 Other evidence to inform the Joint Local Plan includes the Newcastle-under-Lyme Borough Council and Stoke-on-Trent City Council adopted design guidance, the Urban Design Supplementary Planning Document (SPD) (2010), Staffordshire Historic Farmstead Guidance; the Stoke-on-Trent Heritage Commission Report and Staffordshire Urban Survey (excluding Stoke-on-Trent). Whilst neither Council has a detailed historic environment characterisation study, the area was assessed as part of high level

characterisation work undertaken by Staffordshire County Council which forms part of the national programme of historic landscape characterisation.

- 6.4 A set of criteria based policies will be developed against which proposals for development will be considered. Policies should give appropriate weight to the relative importance of landscapes and townscapes across the area, and set out how development proposals should conserve and enhance local landscape and townscape character and quality.

Historic Environment

- 6.5 The National Planning Policy Framework (NPPF) states that the planning system has a role in contributing to protecting and enhancing our built and historic environments (paragraph 7). It also identifies planning's role in conserving heritage assets within its core planning principles (paragraph 17) and states that planning should 'conserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations.
- 6.6 Local Planning Authorities, in planning for their areas are expected to set out a positive and clear strategy for the conservation, enjoyment and enhancement of the historic environment (NPPF, Paragraphs 126 and 157), contain strategic policies to deliver the conservation and enhancement of the historic environment (NPPF, Paragraph 156), and identify land where development would be inappropriate because of its environmental or historic significance (NPPF, Paragraph 157).
- 6.7 Newcastle-under-Lyme and Stoke-on-Trent benefit from substantial heritage assets that make a positive contribution towards the area's local character and distinctiveness. They also have wider social, cultural, economic and environmental benefits by encouraging community pride, and promoting tourism. The Councils recognise that heritage assets are irreplaceable resources and through conservation measures will maintain and manage change to assets, in ways that sustain and where appropriate, enhance their significance.
- 6.8 The unique heritage of the plan area arises from its wealth of historic sites and buildings, and the manner in which these are grouped forming attractive townscapes and landscapes. These heritage assets include many fine buildings, including civic buildings, churches, industrial buildings, warehouses, parks, pillar boxes and mileposts. Heritage assets may be classified as either 'designated' or 'non-designated' and both can be important to consider through the planning process. The Plan area has a rich built heritage with 380 listed buildings in Newcastle-under-Lyme and 206 listed sites in Stoke-on-Trent (where a listed site may include several individual buildings). Of these 14 are on the Historic England list of heritage which is considered to be at Risk. There are also 44 Conservation Areas, of

which 6 are on the Historic England Risk Register. Along with formally listed buildings on the Historic England national list there are also over 550 locally listed buildings or structures.

- 6.9 The evidence base also includes the Historic Environment Record which provides information on the historical environment, a record of heritage assets, acting as an index of information held in reports, primary and secondary sources; Newcastle-under-Lyme Borough Council has adopted a 'Register of Locally Important Buildings and Structures Supplementary Planning Document' (SPD) which sets out how the Council will consider and treat local heritage assets on the local Register; Staffordshire Historic Farmstead Guidance and the Stoke-on-Trent Heritage Commission Report; along with Conservation Area Appraisals and management plans. Stoke-on-Trent City Council is currently reviewing and updating its Local List of Important Buildings. This is scheduled to be completed and adopted by the Council in early 2018.
- 6.10 It is recognised that heritage assets should be preserved and enhanced; responses to the Strategic Options consultation reinforced that message. The Joint Local Plan will set a clear and positive strategy for the historic environment and criteria-based policies will be developed against which proposals for development will be considered. Policies should give appropriate weight to the relative importance of heritage assets, including their setting and set out how development proposals should conserve and enhance them. Policies will also promote high-quality design and ensure that development responds to its local context and creates safe, accessible and attractive places where people want to live, work and visit. Design is covered in the Landscape section.

Green and Open Space

- 6.11 Both Councils have undertaken studies of the green and open spaces within their areas to inform the development strategy and future planning policies and designations within the Joint Local Plan. Stoke-on-Trent's evidence comprises of an emerging Green Space Strategy and Newcastle-under-Lyme's evidence is included in an Open Space Strategy and a Green Infrastructure Strategy.
- 6.12 Together, these studies provide a comprehensive evidence base to assess the current provision of green and open spaces across the plan area and whether or not they are likely to meet the existing and future needs of the local population.
- 6.13 Newcastle-under-Lyme's Open Space Strategy identifies an overprovision of most types of open space, but especially natural and semi-natural green space at a borough level (although acknowledging that consideration of localised typology is necessary). There is however an overall undersupply

of allotments. Stoke-on-Trent's emerging Green Space Strategy identifies that across the city there is an oversupply of allotments, amenity and recreational green space, and semi natural green spaces but a deficiency of playgrounds.

- 6.14 The identified oversupply of the green and open space types identified above is projected to continue over the plan period to 2033, even under the highest growth scenario that was presented within the Strategic Options Consultation document (Growth Scenario D). There is therefore potentially some flexibility to dispose of certain poorer quality green and open spaces (or parts of their area) to enable them to be used for alternative purposes, subject to Council resolution and operational considerations. The deficiencies of allotments in Newcastle-under-Lyme and playgrounds in Stoke-on-Trent can be best addressed through new provision facilitated by the delivery of development schemes.
- 6.15 The Draft Joint Local Plan will propose new planning policies and designations that seek to manage the future provision of green and open spaces across the plan area in order to make sure that:
- surpluses and deficiencies are addressed in circumstances where they exist, and
 - the best quality and most important spaces will be protected and enhanced with the aim of improving the overall value of the green and open space network.
- 6.16 This approach will satisfy paragraphs 73 and 74 of the NPPF which state that "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" and that "Existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements"
- 6.17 It should be noted that only a small portion of preferred options sites are on existing poor-quality green spaces, where existing proposals already exist. Any further provision identified through council asset reviews would contribute to windfall development.

Summary of findings from the Sustainability Appraisal

- 6.18 Most of the potential effects were identified as uncertain or dependent on implementation. Positive potential effects were identified against the objectives to increase life expectancy, improve health and mental well-being and provide the widest range of community, cultural and leisure services and facilities. A major positive potential effect was identified against the objective to maintain and enhance the quality and accessibility of green space, as this is the main focus of this preferred option. Mitigation

measures that were recommended to improve the sustainability of this preferred option include ensuring that improvements are also made to biodiversity, the historic environment, landscape and townscape, accessibility by active modes of travel and that the design of green spaces leads to reductions and not increases to crime or the fear of crime.

Consultation Question

Do you agree with the preferred approach for managing the future provision of green and open spaces across the plan area?

7.0 Waste and Minerals

- 7.1 With Newcastle-under-Lyme being a two-tier authority, issues of waste and minerals are dealt with at the county level. Staffordshire County Council has a Minerals Local Plan adopted in 2017 and a joint Waste Local Plan with the City of Stoke-on-Trent, which was adopted in 2013.
- 7.2 As a unitary authority Stoke-on-Trent City Council is also a waste and mineral planning authority. The Council does benefit from an adopted Waste Local Plan as discussed above. However with revised growth level, it may be necessary to revisit this. Work is currently being initiated to update monitoring information to check the Waste Local Plan's performance.
- 7.3 The Local Plan needs to make appropriate provision for waste management, recycling and treatment facilities within the area. The current policy shows a criteria based approach for where further facilities are required. The current preferred strategy is for this to continue.
- 7.4 The NPPF gives guidance that Local Plans should also facilitate the sustainable use of minerals. This should be done by Local Plans identifying and including policies for extracting minerals, taking account of the contribution of secondary and recycled materials. The Local Plan should also safeguard areas to avoid needlessly sterilising.
- 7.5 Active mineral operations in Stoke-on-Trent are limited due to the urban form. These areas were identified in the adopted Core Spatial Strategy as Mineral Safeguarded Areas. This means that where such reserves are believed to exist and sterilisation is threatened by built development in accordance with national policy then special measures need to be put in place to confirm the existence of viable reserves and take steps to recover them prior to building the development. In consultation with Staffordshire County Council mineral safeguarding is of continued importance in Stoke-on-Trent and the preferred option is to continue to safeguard appropriate areas of the city. Work is ongoing to confirm the areas and level of protection it is appropriate to safeguard.

Summary of findings from the Sustainability Appraisal

- 7.6 Most of the potential effects were identified as either neutral or dependent on how this preferred option will be implemented. There were unknown or uncertain potential effects in regard to conserving, enhancing and promoting local distinctiveness, encouraging self-sufficiency in waste treatment and providing housing choice. There was a minor positive potential effect identified against the objectives to reduce contamination, regenerate degraded environments, re-use materials and maintain soil, geological and land resources and a major positive effect identified against the objective to ensure the efficient use of mineral resources. Recommended mitigation measures to improve the sustainability of this preferred option include ensuring that sites are properly remediated after extraction to ensure that the environment does not become degraded and that remediated sites can be considered for redevelopment to other uses such as housing, employment or green space.

Consultation Question

Do you agree with the preferred approach to safeguard important minerals resources within the City of Stoke-on-Trent?

8.0 Climate Change

- 8.1 Climate change and flood risk are important issues which require consideration at a local level. Planning has the potential to play a key role in responding to these issues, through shaping new and existing developments in ways that reduce carbon dioxide emissions and ensuring any risks flooding may pose to development are minimised.
- 8.2 National policy gives us a number of key considerations to take into account in plan making. Local Plans need to consider measures which could help us to mitigate and adapt to the effects of climate change, such as creating renewable and low carbon energy sources and promoting sustainable transport solutions.
- 8.3 The local plan will continue to support a more sustainable use of energy within the plan area and use of renewable energy where it is appropriate. An example of this is the district heating network that is currently being rolled out across central areas of Stoke-on-Trent. Similar projects will be explored and supported where appropriate. Policy will be included in the Local Plan to help guide developers, ensuring that renewable energy production does not lead to other adverse impacts on the environment.

9.0 Infrastructure

- 9.1 Infrastructure planning is a key component of the local plan-making process. Infrastructure can take many forms and is essential to support the objectives of increasing the delivery of homes, economic growth, mitigating climate change and creating sustainable communities. The National Planning Policy Framework (NPPF) highlights the importance of infrastructure planning and delivery under paragraph 156.
- 9.2 Local planning authorities should set out the development priorities for the area in the Local Plan. This should include strategic policies to deliver:
- The homes and jobs needed in the area.
 - The provision of retail, leisure and other commercial development.
 - The provision of infrastructure for transport, telecommunications, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat).
 - The provision of health, security, community and cultural infrastructure and other local facilities.
 - Climate change mitigation and adaptation, conservation and enhancement of the natural and historic environment, including landscape.
- 9.3 The infrastructure planning process as a whole will aim to identify and have a thorough understanding of infrastructure provision and requirements in the future. As a whole, the process will identify:
- Infrastructure providers within the area.
 - An understanding of the existing level of provision.
 - Areas where the current provision is under pressure or lacking.
 - Potential areas where the current provision identifies spare capacity and the need to review.
 - What infrastructure provision will be required to support communities in the future to respond to social and economic changes.
 - Future programmes for investment showing where there will be enhancements or reductions with details of where additional funding may need to be secured to meet future infrastructure needs.
- 9.4 Work has begun across both authorities in order to understand the existing provision and areas where current provision may be under pressure. At this stage, we have identified the requirement for new strategic road infrastructure in the centre of Stoke-on-Trent in connection with a strategic development site at Berryhill. The Hanley Bentilee link road has been highlighted as being required to deliver wider benefits in relieving traffic congestion and improving

linkages across the city and into Stoke-on-Trent City Centre. Further dialogue will continue with key infrastructure providers and will inform the production of an Infrastructure Capacity Assessment which will be the first stage in the production of the Infrastructure Delivery Plan. This information will then enable the current infrastructure provision to be considered as we progress with the Joint Local Plan to the Draft Local Plan stage.

10.0 Character Areas

- 10.1 The Joint Local Plan covers the whole of the area of Stoke-on-Trent and Newcastle-under-Lyme with many distinct areas. The aim of the Joint Local Plan is to ensure that any future planning policies for the area recognise this distinctiveness and new plans and policies are integrated into the area in a considered way.
- 10.2 Whilst the Preferred Options Document primarily sets out options on a strategic level, as the plan progresses it is the intention that the Joint Local Plan will identify any specific plans and proposals at a sub-area level and as character areas. The character areas proposed are very different to the sub-areas set out in the adopted Core Spatial Strategy; however it is felt that these will help to determine issues around sustainability (including infrastructure delivery) and in engaging communities. Appendix 5 details the character areas.

Summary of findings from the Sustainability Appraisal

- 10.3 All of the potential effects were identified as being dependent on implementation. This is a result of the preferred option being focused on setting out the principle of applying character areas within the Joint Local Plan, rather than providing detailed information about how policies and proposals will be applied through this approach at this stage. The sustainability appraisal for the Draft Local Plan will be able to provide a more thorough analysis of the potential effects of different aspects of this approach.

Consultation Question

Do you consider that sub areas and character areas assist in identifying the sustainability of areas and in engaging communities?

11.0 Conclusions

- 11.1 The vision, aims and objectives and preferred option set out in this document form the proposed development strategy to facilitate development during 2013 – 2033.

- 11.2 We need to make sure that we allow the right amount of development in the right place at the right time. This document aims to make sure that we have the right balance and have taken into account the views we have received so far.
- 11.3 Comments on the Preferred Options Consultation document are invited and in particular we are interested in your views on the following:
- Employment growth option
 - Housing growth option
 - Site preferences
 - Centres approach

12.0 Next Steps

- 12.1 Following this consultation, we will consider the comments received and produce a report including the Councils' response.
- 12.2 We will continue to develop and assess the Preferred Option in more detail and reflect this in the Draft Local Plan which will include draft policies. The Draft Local Plan will be subject to further consultation in 2018. We will continue to collect evidence to inform the Joint Local Plan and Sustainability Appraisal.

13.0 The Joint Local Plan Process

Why are we doing a Joint Local Plan?

- 13.1 The decision to work on a Joint Local Plan was made in 2013 and follows on from the partnership created as a result of the adopted Core Spatial Strategy in 2009 and subsequent shared evidence base that confirms the clear housing and economic market linkages across the plan area.
- 13.2 The existing Core Spatial Strategy is now eight years old and the preparation of the new Joint Local Plan is considered by both authorities to be the most effective way to provide a robust strategy to attract new investment in order to protect and enhance the economic prosperity of both authorities, whilst also continuing to respect the unique characteristics of the area.
- 13.3 Without a Plan we have much less control over the quality and location of development and therefore with the Joint Local Plan in place we will be more able to protect our important green spaces; direct development to appropriate locations and deliver local priorities and aspirations.

Stage in the Joint Local Plan process

- 13.4 The Joint Local Plan covers the whole of the area of Stoke-on-Trent and Newcastle-under-Lyme with many distinct areas. The aim of the Joint Local Plan is to make sure that any future planning policies for the area recognise this distinctiveness and new plans and policies are integrated into the area in a considered way to ensure that place-making is at the heart of the joint local plan.
- 13.5 The Preferred Options Consultation document takes account of feedback from the Issues and Strategic Options stages and sets out plans and proposals for the area which in turn are expressed in character areas.
- 13.6 The diagram set out in Appendix 6 sets out the various stages of plan production and the progress made so far.
- New evidence that has informed the Preferred Option includes the Green Belt Review Part 1 2017 and emerging Stoke-on-Trent Green Space Strategy 2017.
- 13.7 Current evidence base documents under production include:
- Green Belt Assessment Review Part 2
 - Transport Modelling
 - Retail and Leisure Studies Update (Newcastle-under-Lyme and Stoke-on-Trent)

(All evidence based documents can be seen at www.newcastle-staffs.gov.uk/jointlocalplan)

Duty to Cooperate

- 13.8 Under the 2011 Localism Act and the National Planning Policy Framework (NPPF), local planning authorities have a legal Duty to Cooperate with other local planning authorities and organisations to seek to address strategic planning matters that are driven by larger than local issues that are likely to have an impact beyond their immediate Local Plan area. The Duty to Cooperate is the mechanism for ensuring the right issues are addressed, in the right way, and with the right partners to maximise the effectiveness of policy and plan-making.
- 13.9 Cooperation will involve social, environmental and economic issues that can only be addressed effectively by working with other local planning authorities and organisations beyond our own administrative boundaries. For example, housing market areas travel to work areas, and greenspace networks.

- 13.10 Strategic local planning authority duty to cooperate discussions are maintained through the Staffordshire District Officers Group and separate meetings are held with individual local planning authorities to deal with specific issues. Once the Preferred Options is agreed, more focussed discussions will take place, together with other statutory service providers.

Sustainability Appraisal

- 13.11 Sustainability Appraisal is a process whereby the potential social, environmental and economic effects of a plan or project are identified and assessed. To guide the appraisal of effects that the Joint Local Plan may have, both Councils have prepared a Sustainability Appraisal Scoping Report which sets the sustainability objectives against which the plan's policies and proposals will be assessed. The Strategic Options Consultation document was the first Joint Local Plan document that has been subject to sustainability appraisal under these objectives.
- 13.12 A Sustainability Appraisal report accompanies this consultation document. This sets out in full the results of the appraisal of the Preferred Options. The appraisal document is published alongside this Consultation document and forms part of the evidence base.

Strategic Options Consultation Responses

- 13.13 The Joint Local Plan Strategic Options Document was subject to consultation between 17 July and 22 August 2017. The main document was supported by a summary guide and a number of key evidence documents. Feedback was invited against a set number of questions.
- 13.14 A total of 137 representations were received as a result of the consultation. Representations have been received from a variety of consultees including developers, land owners, statutory service providers, housing associations and individual members of the public.
- 13.15 A Strategic Options Consultation report has been produced in response to the comments received and is available on both Councils websites.

How to Comment

- 13.16 Consultation on the Preferred Options document will take place between **1 February 2018 to 1 March 2018** therefore if you have any comments on any aspects of the options consultation both in relation to Stoke-on-Trent and Newcastle-under-Lyme, you can submit your comments to us by email or post using the consultation feedback form.
- 13.17 To find out details of all the consultation activities please check the council's websites - www.stoke.gov.uk/jointlocalplan or www.newcastle-staffs.gov.uk/jointlocalplan. Consultation documents will also be available to view in hard copy at the following locations.

Newcastle-under-Lyme

Guild Hall Customer Service Centre, High Street, Newcastle-under-Lyme, ST5 1PW

The Madeley Centre, New Road, Madeley, CW3 9DW

Kidsgrove Customer Service Centre, Town Hall, Kidsgrove, ST7 4EL

Libraries within Newcastle-under-Lyme.

Stoke-on-Trent

Civic Centre, Glebe Street, Stoke-on-Trent, ST4 1HH

No 1 Smithfield, Hanley, ST1 4FA

Longton Customer Service Centre, Commerce Street, Longton, ST3 1NW

Tunstall Customer Service Centre, 142 High Street, Tunstall, ST6 5TP

Libraries within Stoke-on-Trent.

- 13.18 If you wish to make a representation to the Joint Local Plan Preferred Options Consultation a feedback form is available at www.newcastle-staffs.gov.uk/jointlocalplanform or at the above locations for you to respond to the consultation. All responses must be received by 5pm on Thursday 1 March 2018.

What Happens Next?

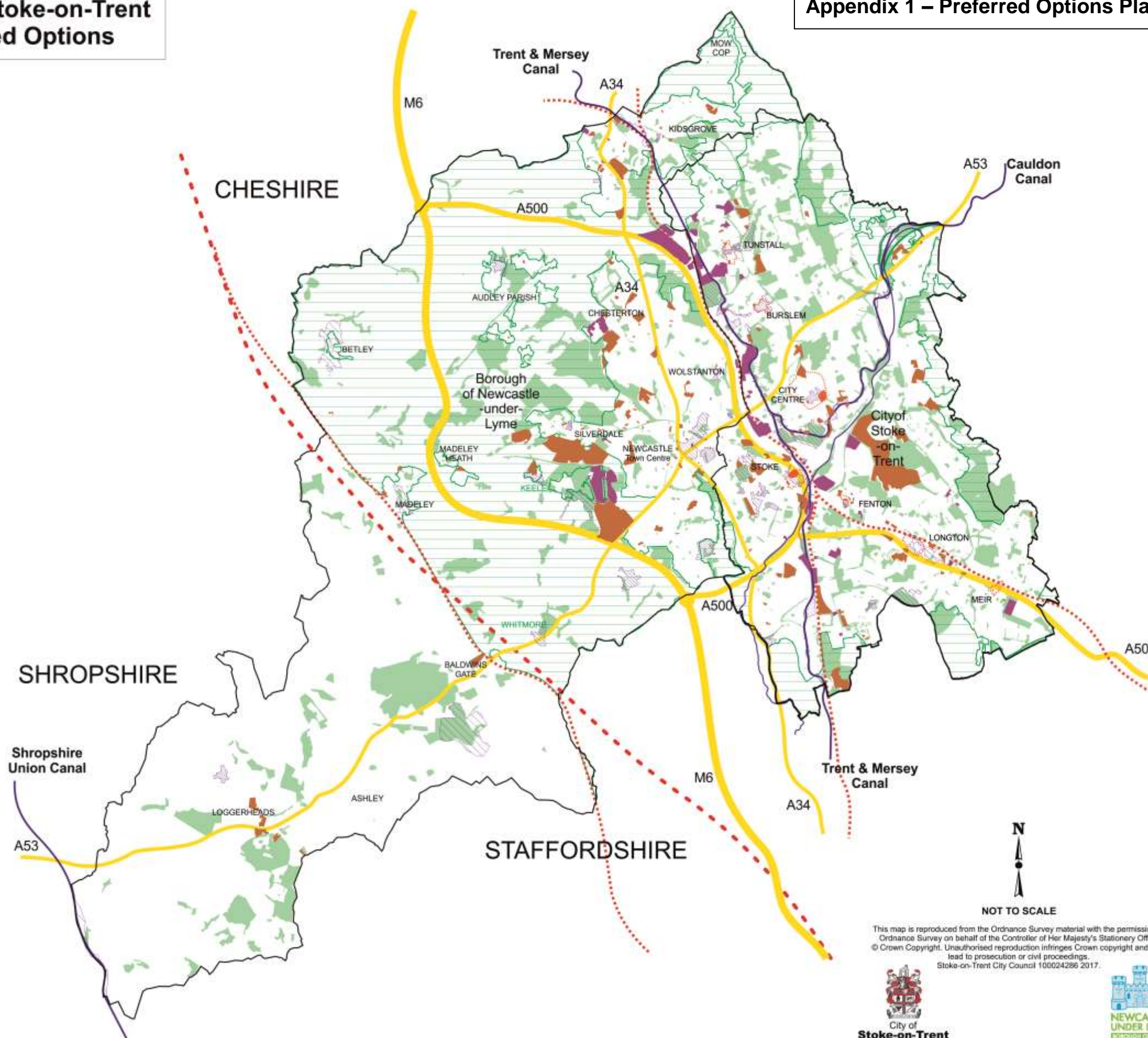
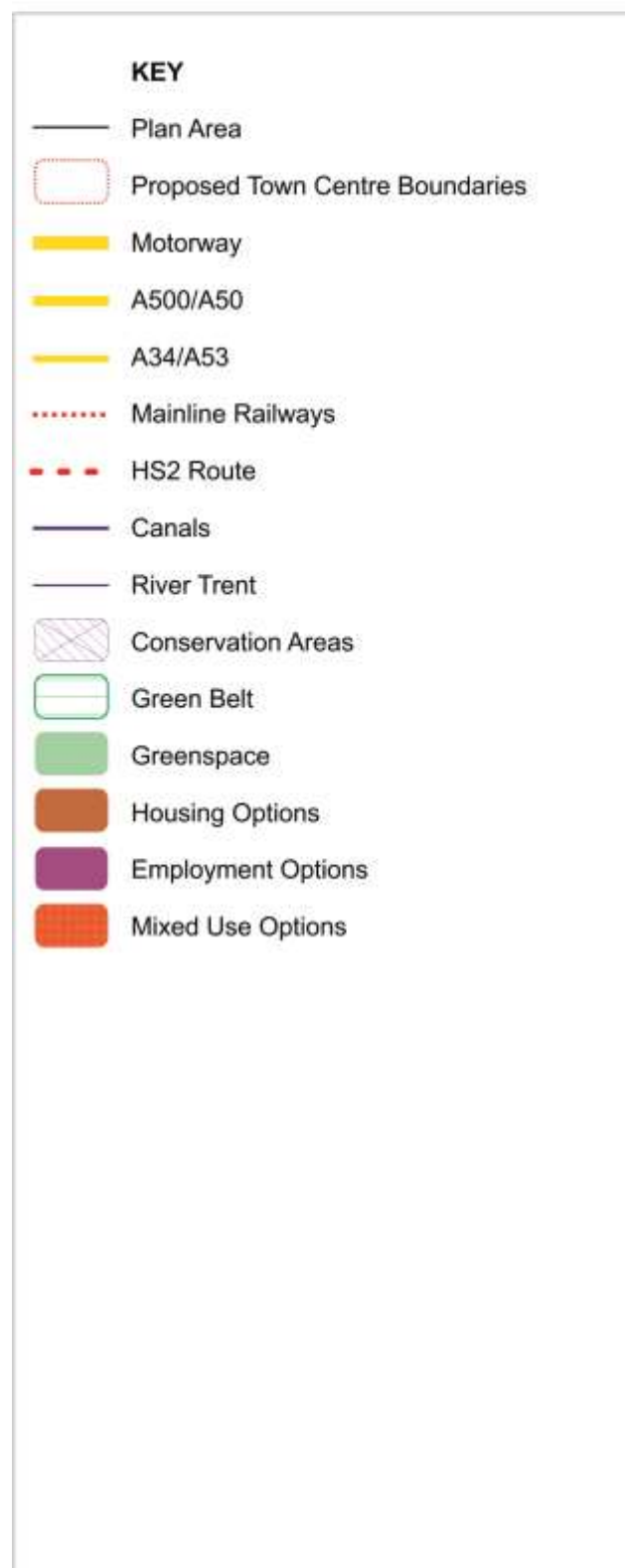
- 13.19 Following this consultation, we will consider comments received and produce a report including the Councils response.
- 13.20 We will continue to develop and assess the identified Preferred Options in more detail and continue to collect evidence to inform the statutory Sustainability Appraisal. Detailed Development Management policies will be produced and included in the Draft Local Plan which will be consulted on in 2018.

14.0 Appendices

DRAFT

Newcastle-under-Lyme and Stoke-on-Trent Joint Local Plan - Preferred Options

Appendix 1 – Preferred Options Plan



Appendix 2 – Preferred Options Sites

Preferred Employment Sites - Stoke-on-Trent

Character Area	Ward(s)	Employment Land Review Reference	Planning Application Reference	Site Address	Site Area (Hectares)
Abbey Hulton and Bentilee	Bentilee & Ubberley, Sandford Hill	ST66	None	Land at Mossfield Road, Mossfield Industrial Estate	1.55
Baddeley, Milton and Norton	Baddeley, Milton & Norton	ST79 (New Site)	58098	Land at Bellerton Lane, Norton	0.53
Burslem and Moorcroft	Burslem Central	ST80 (New Site)	59916	Land at Newcastle Street, Middleport	1.40
Fenton	Fenton West & Mount Pleasant	ST4	46496	Staffordshire House/Fenton 25, Dewsbury Road	9.00
Fenton	Fenton West & Mount Pleasant	ST59	59067	Former Diamond Gimson Site, Fenton	2.23
Fenton	Fenton West & Mount Pleasant		60224	Land off Dewsbury Road, Fenton	0.15
Hanford, Trentham and Blurton	Blurton West & Newstead	ST75 (New Site)	59691	Newstead Industrial Estate, Plantation Road, Blurton	0.63
Hanford, Trentham and Blurton	Blurton West & Newstead, Hollybush & Longton West	ST16	55378	Trentham Lakes South	7.11
Hanford, Trentham and Blurton	Hanford & Trentham	ST11	59205	Radial Park, Sideway	4.72
Hanford, Trentham and Blurton	Hollybush & Longton West	ST12	39499	Trentham Lakes North	5.49
Hanford, Trentham and Blurton	Hollybush & Longton West	ST17	None	South Car Park, Stanley Matthews Way, Trentham Lakes	0.74
Hanley and Etruria	Hanley Park & Shelton	ST18	None	Fenton Quarry	7.00
Hanley and Etruria	Etruria & Hanley	ST27	None	Land adjoining GSH House, Forge Lane, Etruria	0.15

Character Area	Ward(s)	Employment Land Review Reference	Planning Application Reference	Site Address	Site Area (Hectares)
Hanley and Etruria	Etruria & Hanley	ST71	56150, 56151	Etruria Valley Phases 3a and 3b, Forge Lane, Etruria	20.35
Hanley and Etruria	Etruria & Hanley	ST72	52732	Etruria Valley Phase 2a, Forge Lane, Etruria	0.80
Hanley and Etruria	Etruria & Hanley	ST73	48426, 48428	Wades and Trade Park 4, Forge Lane, Etruria	2.84
Hanley and Etruria	Etruria & Hanley	ST9	None	Gas Holder Site, Etruscan Street	0.94
Hanley and Etruria/Stoke	Etruria & Hanley, Hartshill & Basford	ST5	None	Former Slimma Works/ Twyfords Excelsior Works, Cliffe Vale	4.00
Longton, Dresden and Lightwood	Broadway & Longton East	ST64	58794	Former Shires Bathrooms Site, Uttoxeter Road, Longton	0.09
Longton, Dresden and Lightwood	Broadway & Longton East	ST77 (New Site)	55907	191 Uttoxeter Road, Normacot	0.20
Longton, Dresden and Lightwood	Broadway & Longton East	ST78 (New Site)	58117	Land at Gower Street, Longton	0.06
Longton, Dresden and Lightwood	Meir Hay	ST68	40779	Park Hall Business Village, Park Hall Road	0.59
Meir and Weston Coyney	Meir South	ST1	None	Former Johnson Matthey Site, Whittle Road, Meir	8.19
Stoke	Boothens & Oakhill	ST19	59105	Land off Whieldon Road	3.70
Stoke	Boothens & Oakhill	ST20	None	Land at Whieldon Road	2.64
Stoke	Springfields & Trent Vale	ST21	None	Riverside Park off Campbell Road	0.80
Tunstall, Goldenhill and Packmoor	Goldenhill & Sandyford	ST31	60237	Tunstall Arrow	7.15
Tunstall, Goldenhill and Packmoor	Goldenhill & Sandyford	ST34	51067	Chatterley Valley Area 1	3.08
Tunstall, Goldenhill	Goldenhill & Sandyford	ST38	51067	Chatterley Valley Area 2	3.11

Character Area	Ward(s)	Employment Land Review Reference	Planning Application Reference	Site Address	Site Area (Hectares)
and Packmoor					
Tunstall, Goldenhill and Packmoor	Little Chell & Stanfield	ST39	None	Land adjoining Scotia Business Park, Tunstall	1.37
Tunstall, Goldenhill and Packmoor	Tunstall	ST26	51067	Former Tunstall Sewage Works	10.41
Tunstall, Goldenhill and Packmoor	Tunstall	ST32	None	Former Brownhills Tileries, Harewood Street, Tunstall	9.98
Tunstall, Goldenhill and Packmoor	Tunstall	ST33	None	Land off High Street, Tunstall	1.17
Tunstall, Goldenhill and Packmoor	Tunstall	ST36	51067	Chatterley Valley Area 3	1.05
Tunstall, Goldenhill and Packmoor	Tunstall	ST37	59353	Former Ravensdale Sportsfield, Land off Chemical Lane, Tunstall	6.20
Tunstall, Goldenhill and Packmoor	Tunstall	ST76 (New Site)	56416	Land off Chatterley Road, Tunstall	0.80

Source of Supply:	Hectares:
Committed Employment Land =	87.41
Remaining Area on Employment Land Review Sites =	42.81
TOTAL PREFERRED EMPLOYMENT LAND SUPPLY =	130.22
Employment Land Completed 2013-2017 =	36.93
TOTAL SUPPLY INCLUDING DELIVERY =	167.15

Preferred Employment Sites – Newcastle-under-Lyme

Character Area	Ward(s)		Planning Application (or ELR) Reference	Site Address	Site Area (Hectares)
Bradwell	Bradwell	NL4, NL5, NL43	04/00546/OUT 07/00995/OUT	Chatterley Valley, Chatterley, Stoke-On-Trent (Chatterley East, Chatterley South & Chatterley West)	27.56
Keele, Silverdale and Thistleberry	Keele	NL40	15/00190/FUL 11/00058/NMA	IC5, Plot 5 Keele Science Park Phase 3, University of Keele	1.17
Keele, Silverdale and Thistleberry	Keele	NL24		Land to S&E of New Development Site, Keele (KSP4)	12.15
Keele, Silverdale and Thistleberry	Silverdale and Parksite	NL3		Silverdale Business Park, Cemetery Road, Silverdale	0.27
Keele, Silverdale and Thistleberry	Keele	NL40		Keele Science Park Phase 3, University of Keele	12.54
Kidsgrove	Butt Lane	NL37		West Avenue, Kidsgrove	2.05
Newcastle North	Chesterton	NL36	13/00157/FUL	Thorp Precast Ltd, Apedale Road, Chesterton	2.74
Newcastle North	Chesterton	NL36	07/00499/FUL	Plot B, Watermills Road, Chesterton Newcastle Under Lyme, Staffordshire ST5 6AT	0.42
Newcastle North	Chesterton	NL36	14/00205/FUL	Unit 1 Valley Park, Watermills Road, Chesterton, Newcastle Under Lyme, Staffordshire ST5 6AT	0.22
Newcastle North	Wolstanton	NL10		Former Wolstanton Colliery Stock Yard, Wolstanton (and Centre500 northernmost plot)	1.53
Newcastle North	Cross Heath	NL21		Land between Lower Milehouse Lane and Brymbo Road	1.4
Newcastle North	Chesterton	NL36		Rowhurst Close, Chesterton	0

Character Area	Ward(s)		Planning Application (or ELR) Reference	Site Address	Site Area (Hectares)
Newcastle Town	Cross Heath		14/00806/FUL	Former Garages site to the rear of Hempstalls Court, Hempstalls Lane, Newcastle-under-Lyme	0.09
Newcastle Town	Town	NL1	16/00008/FUL	Former St Giles And St Georges Primary School, Barracks Road, Newcastle-under-Lyme, ST5 1LF	0.61

Source of Supply:	Hectares:
Committed Employment Land =	28.59
Remaining Area on Employment Land Review Sites =	29.94
TOTAL PREFERRED EMPLOYMENT LAND SUPPLY =	58.53
Employment Land Completed 2013-2017 =	4.00
TOTAL SUPPLY INCLUDING DELIVERY =	62.53

Preferred Housing Sites – Stoke-on-Trent

Character Area	Ward	SHLAA Ref/Planning Application No.	Site Address	Site Area (Ha)	Capacity
Abbey Hulton and Bentilee	Eaton Park	0132	Berry Hill High School and Sports College, Bucknall, Stoke on Trent, ST2 9LR	7.88	221
Abbey Hulton and Bentilee	Abbey Hulton & Townsend	0140/ 58877	Bucknall Hospital, Eaves Lane, Bucknall, Stoke on Trent, ST2 8LD	8.89	201
Abbey Hulton and Bentilee	Bentilee & Ubberley	0292	Land at, Berryhill	50.5	1316
Abbey Hulton and Bentilee	Abbey Hulton & Townsend	0415	Mitchell High School, Bucknall, Stoke on Trent, ST2 9EY.	6.72	185
Abbey Hulton and Bentilee	Abbey Hulton & Townsend	0651/ 56178	Land adj Blackfriars School, Castle Grove, Abbey Hulton	2.55	175
Abbey Hulton and Bentilee	Abbey Hulton & Townsend	0730	Land to the south of Lillydale Road, Townsend	0.7	22
Baddeley, Milton and Norton	Baddeley, Milton & Norton	0163/ 58470	Corner of, Nursery Lane, Baddeley Green	0.3533	11

Character Area	Ward	SHLAA Ref/Planning Application No.	Site Address	Site Area (Ha)	Capacity
Baddeley, Milton and Norton	Baddeley, Milton & Norton	0491	Royal Doulton, Leek New Road, Baddeley Green	6.72	178
Baddeley, Milton and Norton	Ford Green & Smallthorne	0509/ 58728	Smallthorne Working Mens Club, Chetwynd Street, Smallthorne, Stoke On Trent, ST6 1PP	0.35	15
Burslem and Moorcroft	Burslem Central	0201/ 51947	Former Co-op Bakery Site, Newport Lane, Middleport, Stoke-on-Trent	1.98	96
Burslem and Moorcroft	Moorcroft	0228	Former Simpsons Pottery, Grange Street, Cobridge, Stoke-on-Trent, ST6 2JT	0.73	37
Burslem and Moorcroft	Moorcroft	0340/ 60432	Land at, Crystal Street, Cobridge	0.62	35
Burslem and Moorcroft	Burslem Central	0341	Land at, Hall Street, Burslem	0.44	23
Burslem and Moorcroft	Burslem Central	0705	Allotments off Cotterill Grove, Burslem	0.92	56
Etruria and Hanley	Joiner's Square	0152/ 49916	Eastwood Road, Hanley	4.74	263
Etruria and Hanley	Joiner's Square	0153/ 58689	City Waterside	2.91	111

Character Area	Ward	SHLAA Ref/Planning Application No.	Site Address	Site Area (Ha)	Capacity
Etruria and Hanley	Joiner's Square	0154/ 59772	Ludlow Street, Hanley (Land at Bucknall New Road)	0.91	58
Etruria and Hanley	Joiner's Square	0173/ 48757	Edinburgh House, YMCA, Harding Road, Hanley	1.49	40
Etruria and Hanley	Etruria & Hanley	0221/ 60432	Former pottery works, Crane Street, Cobridge	4.07	193
Etruria and Hanley	Birches Head & Central Forest Park	0303/ 59715	Land at, Elstree Grove, Birches Head, Stoke On Trent, ST1 6UB	0.33	3
Etruria and Hanley	Hanley Park & Shelton	0319/ 57831	Land at, Norfolk Street, Norfolk Street, Shelton, Stoke on Trent	0.36	20
Etruria and Hanley	Birches Head & Central Forest Park	0363	Land off, Leek Road, Northwood, ST1 6AT	0.31	13
Etruria and Hanley	Joiner's Square	0364	Land off, Lichfield Street, Hanley	0.44	33
Etruria and Hanley	Joiner's Square	0410	Melville Street/Wooliscroft Factory, Berryhill and Hanley East, Stoke on Trent, Staffordshire, ST1 3LY	0.89	58
Etruria and Hanley	Joiner's Square	0438	Botteslow Street, Hanley	1.2	77

Character Area	Ward	SHLAA Ref/Planning Application No.	Site Address	Site Area (Ha)	Capacity
Etruria and Hanley	Etruria & Hanley	0442/ 53314	Cobridge Road, Etruria	5.64	300
Etruria and Hanley	Hanley Park & Shelton	0481	Newlands Street, Shelton	1.05	18
Etruria and Hanley	Joiner's Square	0483	Johnson Matthey, Joiners Square	1.81	116
Etruria and Hanley	Hanley Park & Shelton	0666/ 58335	Shelton Pool, Simon Place, Shelton, Stoke on Trent, ST4 2DD and adjacent Shelton Day Centre, Cemetery Road, Shelton, Stoke on Trent, ST4 2DL	0.94	23
Etruria and Hanley	Joiner's Square	0761	Joiners Square Allotments, between Leek Road and Ridgway Road, Joiners Square	0.79	51
Etruria and Hanley	Hanley Park & Shelton	0838/ 61450	Stoke-on-Trent, College Road	1.04	840
Etruria and Hanley	Etruria & Hanley	0844	Land at Smithfield, Hanley	0.34	300
Fenton	Fenton East	0187	Foley Goods Yard, Bute Street, Fenton	1	56
Fenton	Fenton West & Mount Pleasant	0240	Hamilton Training Service, Glebedale Road, Fenton, ST4 3AQ	0.42	19
Fenton	Fenton East	0370	Land off, Baron Street, Fenton	0.85	50

Character Area	Ward	SHLAA Ref/Planning Application No.	Site Address	Site Area (Ha)	Capacity
Fenton	Fenton West & Mount Pleasant	0758	Land off City Road, Fenton	1.31	52
Hanford, Trentham and Blurton	Hollybush & Longton West	0172	Edensor Technology School, Edensor Road, Longton	6.8	428
Hanford, Trentham and Blurton	Blurton West and Newstead	0331/ 53413	Land at, Trentham Lakes, Stanley Matthews Way, Stoke-on-Trent	6.42	260
Hanford, Trentham and Blurton	Hanford & Trentham	0334/ 54189	Land at, Wilson Road, Hanford	1.36	13
Hanford, Trentham and Blurton	Hanford & Trentham	0369	Land off, Wilson Road, Hanford, Stoke-on-Trent, ST4 8QT	9.81	274
Hanford, Trentham and Blurton	Blurton West and Newstead	0375	Land off, Magdalen Road, Blurton	4.18	95
Hanford, Trentham and Blurton	Blurton West and Newstead	0519	Swallows Nest PH, Ufton Close, Newstead	0.34	18
Hanford, Trentham and Blurton	Blurton West and Newstead	0541/ 55286	Wedgwood Estate (Phase 3 -The Oaks), Wedgwood Drive, Trentham, Stoke-on-Trent, ST12 9ER	4.23	29

Character Area	Ward	SHLAA Ref/Planning Application No.	Site Address	Site Area (Ha)	Capacity
Hanford, Trentham and Blurton	Blurton West and Newstead	0543/ 55286	Wedgwood Estate Phase 1 The Lakeside, Wedgwood Drive, Trentham, Stoke On Trent, ST12 9ER	6.17	27
Hanford, Trentham and Blurton	Blurton West and Newstead	0562	Land at UMBERLEIGH Road, Blurton, and other land, ST3 3ND and Public Open Space at Newstead	0.81	22
Hanford, Trentham and Blurton	Hanford & Trentham	0662/ 58702	Former Edith Beddow Residential Home (Site only), New Inn Lane, Hanford, Stoke on Trent, ST4 8EZ	0.43	14
Hanford, Trentham and Blurton	Blurton West and Newstead	0675/ 55286	Wedgwood Estate (Phase2 The Village), Wedgwood Drive, Trentham, Stoke-on-Trent, ST12 9ER	5.98	120
Hanford, Trentham and Blurton	Hanford & Trentham	0752/ 60629	Trentham Library & Ron Boulton Scout House, Trentley Road	0.54	6
Hanford, Trentham and Blurton	Hollybush & Longton West	0766	Land at Power Grove, Hollybush, Longton	2.09	132
Hanford, Trentham and Blurton	Hollybush & Longton West	0767	Coronation Avenue Development Land, off Heathcote Road, Longton	1.09	78

Character Area	Ward	SHLAA Ref/Planning Application No.	Site Address	Site Area (Ha)	Capacity
Longton, Dresden and Lightwood	Broadway & Longton East	0196	Former Blythe and Sutherland Works, Sutherland Road, Longton	2.04	80
Longton, Dresden and Lightwood	Lightwood North & Normacot	0379/ 53385	Land off, Wren View, Normacot	0.59	19
Longton, Dresden and Lightwood	Broadway & Longton East	0433	Portland Works, Sutherland Road, Longton	1.4	56
Longton, Dresden and Lightwood	Broadway & Longton East	0468	Pottery, Sutherland Road, Longton	0.38	19
Longton, Dresden and Lightwood	Lightwood North & Normacot	0774	Development Land at Bengry Road, Longton	0.69	28
Meir and Weston Coyney	Meir South	0274/ 60447	Land adjacent to 658, Lightwood Road, Lightwood.	0.21	8
Meir and Weston Coyney	Weston Coyney	0315/ 51722	Land at, Main Street/ Flint Street/ Gate Street, Weston Coyney	2.15	11
Meir and Weston Coyney	Meir South	0342	Land at, Harrowby Road, Meir	0.3	11
Stoke	Springfields & Trent Vale	0129	Bird In Hand, 942 London Road, Stoke On Trent, ST4 5NX	0.33	24

Character Area	Ward	SHLAA Ref/Planning Application No.	Site Address	Site Area (Ha)	Capacity
Stoke	Penkhull & Stoke	0193/ 56801	Former Ashfields Cottages, Sturgess Street, Stoke on Trent	0.62	43
Stoke	Hartshill and Basford Ward	0206/ 59600	Former Dyson Thermal Technologies, Shelton New Road, Hartshill, Stoke-on-Trent, ST4 6EP	4.57	131
Stoke	Hartshill and Basford Ward	0229/ 55314	Former St Dominic's School, Hartshill Road, Stoke-on-Trent, ST4 7LY	1.28	29
Stoke	Penkhull & Stoke	0297/ 51841	Land at, Central Outpatients/Central Pathology Laboratory, Thornburrow Drive, Hartshill, Stoke-on-Trent	2.36	69
Stoke	Penkhull & Stoke	0320/ 52839	Land at, North Staffordshire Royal Infirmary, Princes Road / Queens Road, Hartshill, Stoke on Trent	8.75	236
Stoke	Hartshill and Basford Ward	0426/ 59223	Minton Hollins (land) (employment), Shelton Old Road, Stoke	2.79	485
Stoke	Hartshill and Basford Ward	0503/ 59219	Site at Former Irish Club, 27 North Street, Stoke On Trent, ST4 7DQ	0.4	300
Stoke	Penkhull & Stoke	0512	Spode Works (residential element but full site area shown), Elenora Street, Stoke	4.07	300

Character Area	Ward	SHLAA Ref/Planning Application No.	Site Address	Site Area (Ha)	Capacity
Stoke	Penkhull & Stoke	0515/ 59042	St Peters High School, Queens Road, Penkhull	1.98	61
Stoke	Boothens & Oakhill	0539/ 61254	Victoria Ground, Boothens Old Road, Stoke	6.7	200
Stoke	Penkhull & Stoke	0744	Land to the east of Wain Drive, Penkhull, Stoke	5.47	191
Stoke	Penkhull & Stoke	0839/ 58372	Land to side and rear of London House, London Road, Stoke-on-Trent	0.43	202
Tunstall, Goldenhill and Packmoor	Goldenhill & Sandyford	0198/ 49728	Former Clanway Brickworks, off James Brindley Way, Sandyford, Stoke-on-Trent ST6 5NW	1.66	53
Tunstall, Goldenhill and Packmoor	Tunstall	0222	Former pottery, Parsonage Street, Tunstall	0.49	28
Tunstall, Goldenhill and Packmoor	Tunstall	0232/ 55794	Former Tunstall Health Centre, Dunning Street, Tunstall, Stoke On Trent, ST6 5AP	0.47	19
Tunstall, Goldenhill and Packmoor	Bradeley & Chell Heath	0245	Heathfield Special School, Chell Heath Road, Chell Heath, Stoke on Trent, ST6 6PD	1.08	35
Tunstall, Goldenhill and Packmoor	Tunstall	0304/ 56967	Land at, Furlong Road, Tunstall, Stoke-on-Trent	0.91	29

Character Area	Ward	SHLAA Ref/Planning Application No.	Site Address	Site Area (Ha)	Capacity
Tunstall, Goldenhill and Packmoor	Little Chell & Stanfield	0351	Land between Huntilee Road and Scotia Road, Scotia Road, Tunstall	9.2	258
Tunstall, Goldenhill and Packmoor	Great Chell & Packmoor	0545/ 56179	Westcliffe Hospital, Turnhurst Road, Chell, Stoke-on-Trent	2.09	140
Tunstall, Goldenhill and Packmoor	Tunstall	0560	Former Clanway Stadium, James Brindley Way	6.72	281
Tunstall, Goldenhill and Packmoor	Bradeley & Chell Heath	0693	Land Behind Canterbury Drive, Chell Heath (Former Burnwood High Playing Fields)	2.49	174

Source of Housing Supply – Stoke-on-Trent:	No of dwellings
Preferred Housing Sites Total =	10,301
Housing Completions 2013 - 2017 =	2,235
Remaining capacity on sites with Planning Permission (outside the SHLAA) =	1,164
Windfall Allowance =	3192
TOTAL SUPPLY INCLUDING DELIVERY =	16,892

Preferred Housing Sites – Newcastle-under-Lyme

Character Area	Ward	SHLAA Ref/Planning Application No.	Site Address	Site Area (Ha)	Capacity
Audley and Bignall End	Audley and Bignall End	AB11 / 16/00273/FUL	Ravens Close, Bignall End	0.17	6
Audley and Bignall End	Audley and Bignall End	AB17 / 15/00692/FUL	Former working men's club, New Road, Audley	0.33	12
Audley and Bignall End	Halmerend	HM24 / 15/00588/REM	Land Rear Of Boars Head, High Street Halmerend	0.16	8
Betley, Balterley and Wrinehill	Halmerend	HM25 / 15/00759/FUL	Blue Bell Inn, New Road, Wrinehill	0.21	5
Betley, Balterley and Wrinehill	Halmerend	HM3 / 06/00984/FUL	Wrinehill Garage Main Road	0.16	7
Chapel & Hill Chorton, Maer & Aston and Whitmore	Loggerheads and Whitmore	LW33 / 16/00676/REM	Land at Baldwin's Gate Farm, Baldwin's Gate	5.89	109
Chapel & Hill Chorton, Maer & Aston and Whitmore	Loggerheads and Whitmore	LW36 / 16/00609/FUL	Land Adjacent The Sheet Anchor Newcastle Road Whitmore ST5 5BU	0.48	7
Keele, Silverdale and Thistleberry	Keele	KL14	Land south east of Keele University	26.1	104

Character Area	Ward	SHLAA Ref/Planning Application No.	Site Address	Site Area (Ha)	Capacity
Keele, Silverdale and Thistleberry	Keele	KL16 / 13/00970/OUT	Land off Pepper Street, Keele	14.07	100
Keele, Silverdale and Thistleberry	Keele	KL17 / 15/01004/FUL	The Hawthorns, Keele (West)	5.69	83
Keele, Silverdale and Thistleberry	Silverdale and Parksites	SP11	Former Keele Municipal Golf Course	81.01	1800
Keele, Silverdale and Thistleberry	Silverdale and Parksites	SP15 / 11/00284/FUL	Former Site Of Silverdale Station, Station Road, Silverdale	0.62	23
Keele, Silverdale and Thistleberry	Thistleberry	TB19	Land off Whitmore Road, Seabridge	45.31	550
Keele, Silverdale and Thistleberry	Thistleberry	TB22 / 16/00405/REM	35 Higherland, Newcastle	0.2	12
Keele, Silverdale and Thistleberry	Thistleberry	TB23	Land west of Galingale View, Thistleberry	4.14	66
Keele, Silverdale and Thistleberry	Thistleberry	TB5 / 15/01085/OUT	Keele Road, Newcastle (Hamptons Scrapyard and land to the west)	4.99	138
Keele, Silverdale and Thistleberry	Thistleberry	TB7	Orme Road, (Orme Centre)	0.36	14
Kidsgrove	Butt Lane	BL18	Clough Hall Playing Fields, Talke	13.25	424

Character Area	Ward	SHLAA Ref/Planning Application No.	Site Address	Site Area (Ha)	Capacity
Kidsgrove	Butt Lane	BL20 / 13/00266/FUL	Land Off Slacken Lane Kidsgrove	0.54	6
Kidsgrove	Butt Lane	BL21 / 15/00916/REM	Land S of West Avenue, W of Church Street/ Congleton Road, and N of Linley Road, Butt Lane	6.58	90
Kidsgrove	Butt Lane	BL23 / 14/00767/FUL	Former Woodshutts Inn, Lower Ash Road, Kidsgrove	0.51	22
Kidsgrove	Butt Lane	BL24 / 14/00027/FUL	Land adjacent 31 Banbury Street, Talke	0.27	13
Kidsgrove	Butt Lane	BL25 / 11/00656/FUL & 14/00266/FUL	Methodist Church, Chapel Street, Butt Lane	0.1	10
Kidsgrove	Butt Lane	BL26 / 15/00452/FUL	33 - 33A Lower Ash Road, Kidsgrove	0.15	6
Kidsgrove	Butt Lane	BL3	Land at Slacken Lane, Talke	1.63	55
Kidsgrove	Butt Lane	BL8 / 15/00368/OUT	Land to the south of West Avenue, Kidsgrove	1.41	44
Kidsgrove	Kidsgrove	KG12	Land at Newchapel Road, Newchapel	2.52	80
Kidsgrove	Kidsgrove	KG13	Land at Pennyfields Road, Newchapel	1.85	51

Character Area	Ward	SHLAA Ref/Planning Application No.	Site Address	Site Area (Ha)	Capacity
Kidsgrove	Kidsgrove	KG15 / 14/00890/DEEM3	Former Garages at Gloucester Road	0.29	8
Kidsgrove	Kidsgrove	KG16	Lock Up Garages Sussex Drive Kidsgrove	0.133	6
Kidsgrove	Kidsgrove	KG6 / 11/00494/FUL	William Road, Kidsgrove (site of the Galley PH)	0.18	10
Kidsgrove	Kidsgrove	KG9	Land at Gloucester Rd, Kidsgrove	0.73	24
Kidsgrove	Ravenscliffe	RC1	Land at Heathcote St, Kidsgrove	0.27	10
Kidsgrove	Ravenscliffe	RC6	Land at Valentine Road, Kidsgrove	0.17	6
Kidsgrove	Ravenscliffe	RC8 / 15/00818/FUL	Land at Liverpool Road (part of Birchenwood) Kidsgrove (parcel 2)	0.38	8
Kidsgrove	Talke	TK12	Chester Road (former Talke Library), Talke	0.11	5
Kidsgrove	Talke	TK17	Land of St Martins Road, Talke (A)	4.82	41
Kidsgrove	Talke	TK2	Thomas Street, Talke	0.41	10
Kidsgrove	Talke	TK22 / 08/00014/FUL	Former Talke Social Club, Coal Pit Hill, Talke	0.03	8
Kidsgrove	Talke	TK4 / 16/00874/FUL	Walton Grove/Coppice View, Talke Pits	0.41	10
Kidsgrove	Talke	TK5	Imperial Works, Coalpit Hill, Talke	1.05	32
Kidsgrove	Talke	TK6	Hill Top Primary and Talke Youth Centre, Talke	0.89	18

Character Area	Ward	SHLAA Ref/Planning Application No.	Site Address	Site Area (Ha)	Capacity
Loggerheads	Loggerheads and Whitmore	LW12 / 15/00015/OUT	Tadgedale Quarry, Muckleston Road, Loggerheads	5.84	128
Loggerheads	Loggerheads and Whitmore	LW13 / 16/00784/REM	Muckleston Road, Loggerheads	3.78	78
Loggerheads	Loggerheads and Whitmore	LW17	Eccleshall Road, Loggerheads	2.47	55
Loggerheads	Loggerheads and Whitmore	LW31	Market Drayton Rd, Loggerheads	4.56	51
Loggerheads	Loggerheads and Whitmore	LW34 / 15/00448/OUT	Land NE of Eccleshall Road/ SE of Pinewood Road/NW of Lower Road, Hook Gate	1.14	16
Madeley	Madeley	MD10	Land at Marley Tiles (1), Keele Works, Madeley Heath	1.75	45
Madeley	Madeley	MD31 / 14/00930/OUT	Land off New Road	1.1	32
Madeley	Madeley	MD32 / 13/00990/OUT	Land Adjacent to Rowley House Moss lane	1.63	42

Character Area	Ward	SHLAA Ref/Planning Application No.	Site Address	Site Area (Ha)	Capacity
Madeley	Madeley	MD35 / 14/00132/FUL	Moss Farm, Bower End Lane, Madeley	0.18	5
Newcastle North	Bradwell	BW13 / 16/00103/FUL	Bradwell Lane, Bradwell (Land rear of 166-168)	0.19	6
Newcastle North	Bradwell	BW16	Talke Road (playing fields), Bradwell	2.58	103
Newcastle North	Bradwell	BW9	Clayhanger Close, Bradwell	2.62	105
Newcastle North	Cross Heath	CH10 / 15/00699/FUL	Ashfields New Road (land adj Sainsburys)	0.65	34
Newcastle North	Cross Heath	CH3	Land at Hoon Avenue, Newcastle	3.79	133
Newcastle North	Cross Heath	CH4	Wilmott Drive, Cross Heath, Newcastle-under-Lyme	8.7	250
Newcastle North	Chesterton	CT10	Parkhouse Road West, Chesterton	4.4	100
Newcastle North	Chesterton	CT12	Dragon Square, Rosevale Court, Chesterton	0.35	16
Newcastle North	Chesterton	CT13	Heathcote Street, Chesterton (Chesterton Ex-Servicemens Club)	0.1	5
Newcastle North	Chesterton	CT16	Brick Kiln Lane, Chesterton	4.81	144
Newcastle North	Chesterton	CT17	High Street/Lion Grove, Chesterton	0.19	9

Character Area	Ward	SHLAA Ref/Planning Application No.	Site Address	Site Area (Ha)	Capacity
Newcastle North	Chesterton	CT21 / 13/00974/OUT	Land Off Watermills Road	1.43	65
Newcastle North	Chesterton	CT22 / 17/00417/FUL	Ex Servicemens Club Heathcote Street	0.31	19
Newcastle North	Chesterton	CT23 / 10/00480/FUL	Corona Park, Sandford Street, Chesterton	0.3	8
Newcastle North	Chesterton	CT3	Deans Lane, Red Street	1.47	50
Newcastle North	Chesterton	CT9	Hulston Site, Birch House Road, Chesterton, Newcastle-under-Lyme	0.46	22
Newcastle North	Holditch	HD1 / 15/01081/FUL	Brittain Avenue, Chesterton	0.18	7
Newcastle North	Holditch	HD12	London Road, Chesterton	2.59	75
Newcastle North	Holditch	HD14	Land west of Loomer Road, Holditch	2.27	91
Newcastle North	Holditch	HD18 / 09/00155/FUL	London Road, Chesterton (Bennett Arms)	0.15	7
Newcastle North	Holditch	HD24 / 13/00525/OUT	Land Between Apedale Road and Palatine Drive	16.24	350

Character Area	Ward	SHLAA Ref/Planning Application No.	Site Address	Site Area (Ha)	Capacity
Newcastle North	Holditch	HD25 / 16/00623/REM	Midland House, London Road, Chesterton	0.16	14
Newcastle North	Knutton and Silverdale	KS10	Land south of Church Lane, Knutton (land at b)	0.33	13
Newcastle North	Knutton and Silverdale	KS14	Cherry Hill Lane, Silverdale (land at Cherry Hill Farm)	0.27	13
Newcastle North	Knutton and Silverdale	KS16	The Forge, Knutton Lane, Knutton	0.19	9
Newcastle North	Knutton and Silverdale	KS17	Knutton Recreation Centre, Knutton Lane	2.16	87
Newcastle North	Knutton and Silverdale	KS18	Land at Nash Street, Knutton	0.29	8
Newcastle North	Knutton and Silverdale	KS19 / 16/00088/FUL	Land at junction of Church Street and Chapel Street	0.12	6
Newcastle North	Knutton and Silverdale	KS20 / 14/00855/FUL	Land off Lichfield Close, Silverdale	0.39	8
Newcastle North	Knutton and Silverdale	KS21 / 14/00531/FUL	Chapel Court, Chapel Street, Silverdale	0.28	6
Newcastle North	Silverdale and Parksit	KS23 / 15/00493/FUL	Crown Inn, Crown Street, Silverdale	0.055	6
Newcastle North	Knutton and Silverdale	KS24	Land south of St Bernard's Rd	0.19	9

Character Area	Ward	SHLAA Ref/Planning Application No.	Site Address	Site Area (Ha)	Capacity
Newcastle North	Knutton and Silverdale	KS25	Land off Camillus Rd, Knutton	0.2	9
Newcastle North	Knutton and Silverdale	KS3	Land at Blackbank Road, Knutton (adjacent Knutton Children's Centre)	3.75	150
Newcastle North	May Bank	MB8 / 14/00521/FUL	Former Victoria Court, Brampton Road, May Bank	0.16	6
Newcastle North	Wolstanton	WS5	Land at Morris Square, Wolstanton	0.24	6
Newcastle South	Seabridge	SB8	Land between Seabridge Lane and Roe Lane Playing Fields, Westlands	0.18	7
Newcastle South	Westlands	WL11	Seabridge Hall and Grounds, Seabridge Lane	0.65	22
Newcastle South	Westlands	WL15 / 14/00284/FUL	Priory Day Centre, Lymewood Grove, Newcastle	0.66	13
Newcastle South	Westlands	WL2	Clayton Rd (Near Orchard House)	0.87	26
Newcastle South	Westlands	WL6	Queensway, Westlands, Newcastle	0.15	5
Newcastle South	Westlands	WL7	Clayton Road, Clayton	3.69	118
Newcastle South	Westlands	WL9	Ash Way, Seabridge (Seabridge Centre)	2.4	77
Newcastle Town	Newcastle Town	TC17 / 15/00652/FUL	Centurian House, West Street	0.02	6

Character Area	Ward	SHLAA Ref/Planning Application No.	Site Address	Site Area (Ha)	Capacity
Newcastle Town	Newcastle Town	TC18	Water St (Former Police Station)	0.2	10
Newcastle Town	Newcastle Town	TC23 / 16/00494/REM	York Street, Newcastle	0.09	6
Newcastle Town	Newcastle Town	TC26	London Rd, Newcastle (former Bristol St Motors)	1.41	499
Newcastle Town	Newcastle Town	TC29	Victoria Street, Newcastle (7)	0.06	10
Newcastle Town	Newcastle Town	TC3	Liverpool Road, Cross Heath (Bus Depot)	0.82	35
Newcastle Town	Newcastle Town	TC32 / 14/00477/FUL	Newcastle Baptist Church, London Road, Newcastle	0.09	22
Newcastle Town	Newcastle Town	TC5 / 15/00498/FUL	Lower St. (former Maxims nightclub)	0.42	28
Newcastle Town	Newcastle Town	TC9	Old Sainsburys Site B, Newcastle	0.24	41

Source of Housing Supply – Newcastle-under-Lyme:	No of dwellings
Preferred Housing Sites Total =	7,367
Housing Completions 2013 - 2017 =	1,080
Remaining capacity on sites with Planning Permission (outside the SHLAA) =	289
Windfall Allowance =	885
TOTAL SUPPLY INCLUDING DELIVERY =	9,621

Appendix 3 – List of Centres

<p>Tier 3 – Newcastle-under-Lyme District Centres</p> <p>Chesterton; Silverdale and Wolstanton</p>
<p>Tier 3 - SOT Local Centres</p> <p>Abbey Hulton - Leek Road; Basford - Etruria Road; Bentilee - Devonshire Square; Blurton – Finstock Avenue; Fenton - King Street; Fenton - Victoria Road; Goldenhill – High Street; Hanford - Mayne Street; Hartshill - Hartshill Road; Middleport - Newcastle Street; Milton - Leek Road/Millrise Road; Normacot - Uttoxeter Road; Norton Park - Leek New Road; Smallthorne - Ford Green Road and Trentham Lakes – Stanley Matthews Way</p>
<p>Tier 4a Newcastle-under-Lyme Rural Centres</p> <p>Loggerheads; Madeley; Audley; Baldwin's Gate and Halmer End</p>
<p>Tier 4b - SOT Neighbourhood Centres</p> <p>Abbey Hulton - Abbots Road; Baddeley Green - Baddeley Green Lane; Bank Top - High Lane; Bentilee - Beverley Drive; Bentilee - Ford Hayes Lane; Berry Hill - Twigg Street; Birches Head - Diana Road; Blurton - Blurton Road; Blurton - Nashe Drive; Blurton - Wimborne Avenue; Bradeley - Joyce Avenue; Bucknall - Werrington Road; Chell Heath – Chell Heath Road; Dresden - Carlisle Street; Dresden - Trentham Road; Eaton Park - Southall Way; Great Chell – Biddulph Road; Harpfield - Woodberry Close; Heron Cross - Heron Street/Grove Road; Hollybush - Blurton Road; Lightwood - Belgrave Road; Meir Hay - Amison Street; Meir Park - Lysander Road; Northwood - Keelings Road; Norton – Knypersley Road; Norton - Pinfold Avenue; Oakhill - London Road; Penkhull - Manor Court Road; Sandford Hill - Heathcote Street; Shelton - College Road; Shelton - Stoke Road; Sneyd Green - Milton Road; Trentham - The Lea; Trentham - Werburgh Drive; Weston Coyney - New Kingsway and Weston Coyney - Westonfields Drive.</p>

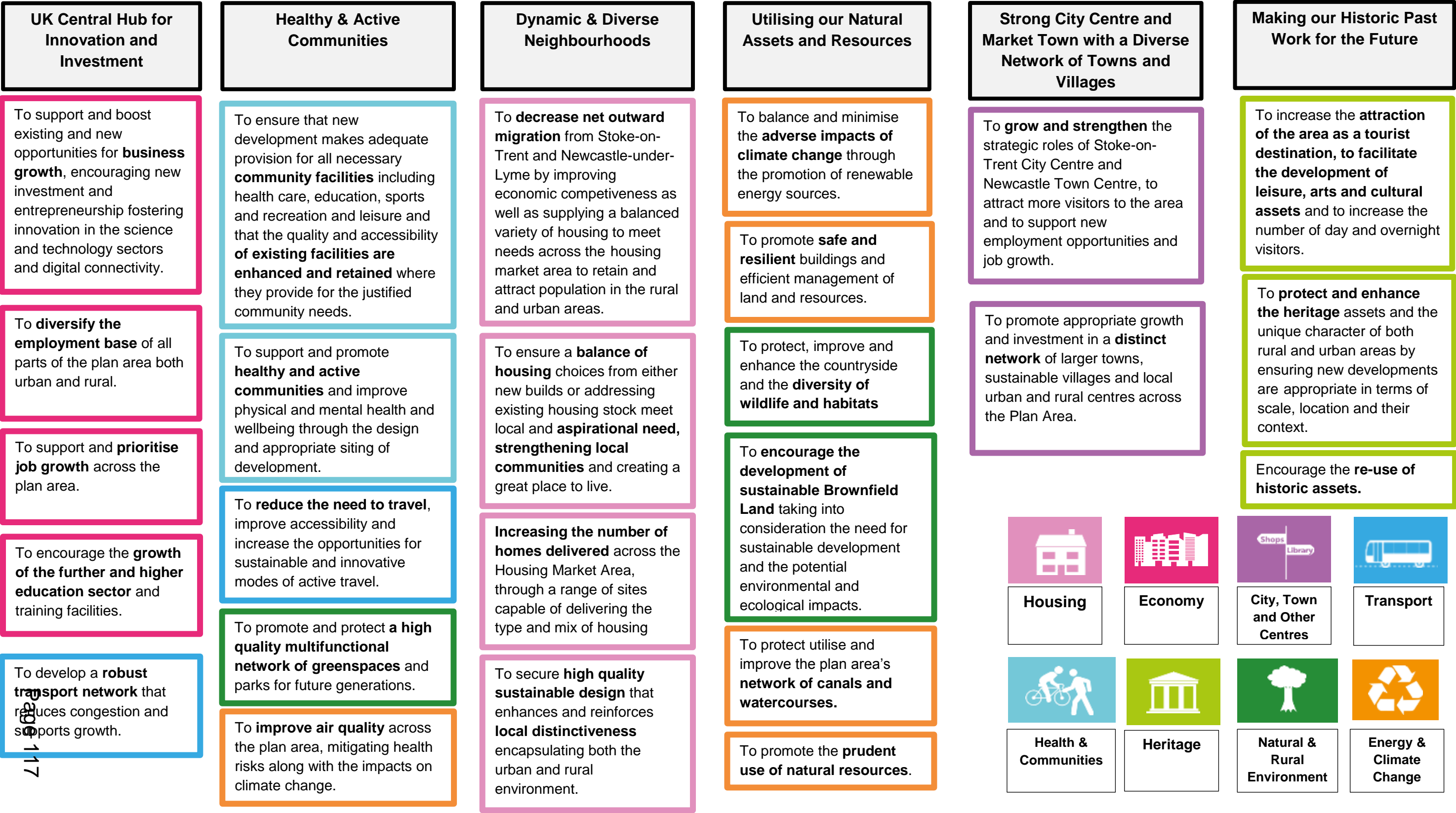
Tier 4b Newcastle-under-Lyme Neighbourhood Centres

Butt Lane, Congleton Road; Porthill, Watlands View; May Bank, High Street; High Street, Knutton Lane; Cross Heath, Liverpool Road; Newcastle, George Street (eastern end); Rookery, High Street; Kidsgrove, Whitehill Road; May Bank, Oxford Road; Parksite, Bath Road; Wolstanton; Dimsdale Parade East; Thistleberry, Paris Avenue; Clayton, Windermere Avenue; Waterhayes, Barbridge Road; Crackley, Birch House Road; Bradwell, Hanbridge Avenue; Clayton, Tyne Way and Clayton, Cambridge Drive.

DRAFT

“Together Stoke-on-Trent and Newcastle-under-Lyme are great places to live, learn, work and visit with active, healthy and prosperous communities at their heart. By 2033 the area will provide a great central innovative hub for investment and growth, having increased the amount of high quality employment, retail and residential choice, whilst protecting and enhancing the distinctive historic built and cultural heritage, natural environment and landscapes and minimising the impact on climate change within their urban and rural areas”

What we want to achieve.....



DRAFT

Appendix 5 – Character Areas

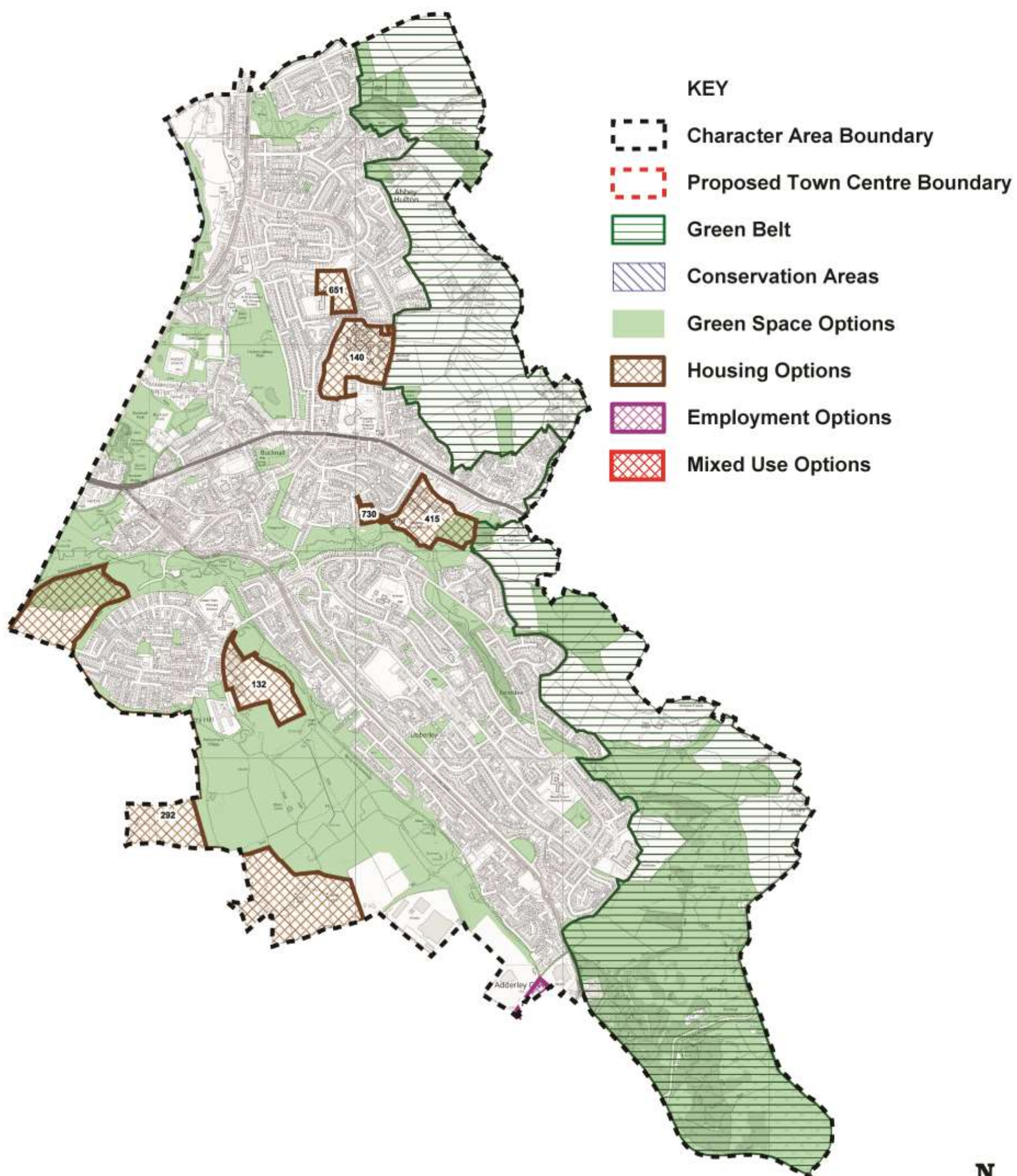
Newcastle-under-Lyme	Stoke-on-Trent
Audley and Bignall End	Abbey Hulton and Bentilee
Betley, Balterley and Wrinehill	Baddeley, Milton and Norton
Chapel and Hill Chorlton, Maer, Aston and Whitmore	Burslem and Moorcroft
Keele, Silverdale and Thistleberry	Etruria and Hanley
Kidsgrove	Fenton
Loggerheads	Hanford, Trentham and Blurton
Madeley	Longton, Dresden and Lightwood
Newcastle North	Meir and Weston Coyney
Newcastle South	Stoke
Newcastle Town	Tunstall, Goldenhill and Packmoor

Due to the limitations of the mapping some site labels might not be visible on these maps.

Please contact us either by email – localplan@stoke.gov.uk or by telephone – 01782 235824

DRAFT









Abbey Hulton and Bentilee Character Area



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Baddeley, Milton and Norton Character Area





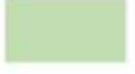



- KEY**
-  Character Area Boundary
 -  Proposed Town Centre Boundary
 -  Green Belt
 -  Conservation Areas
 -  Green Space Options
 -  Housing Options
 -  Employment Options
 -  Mixed Use Options

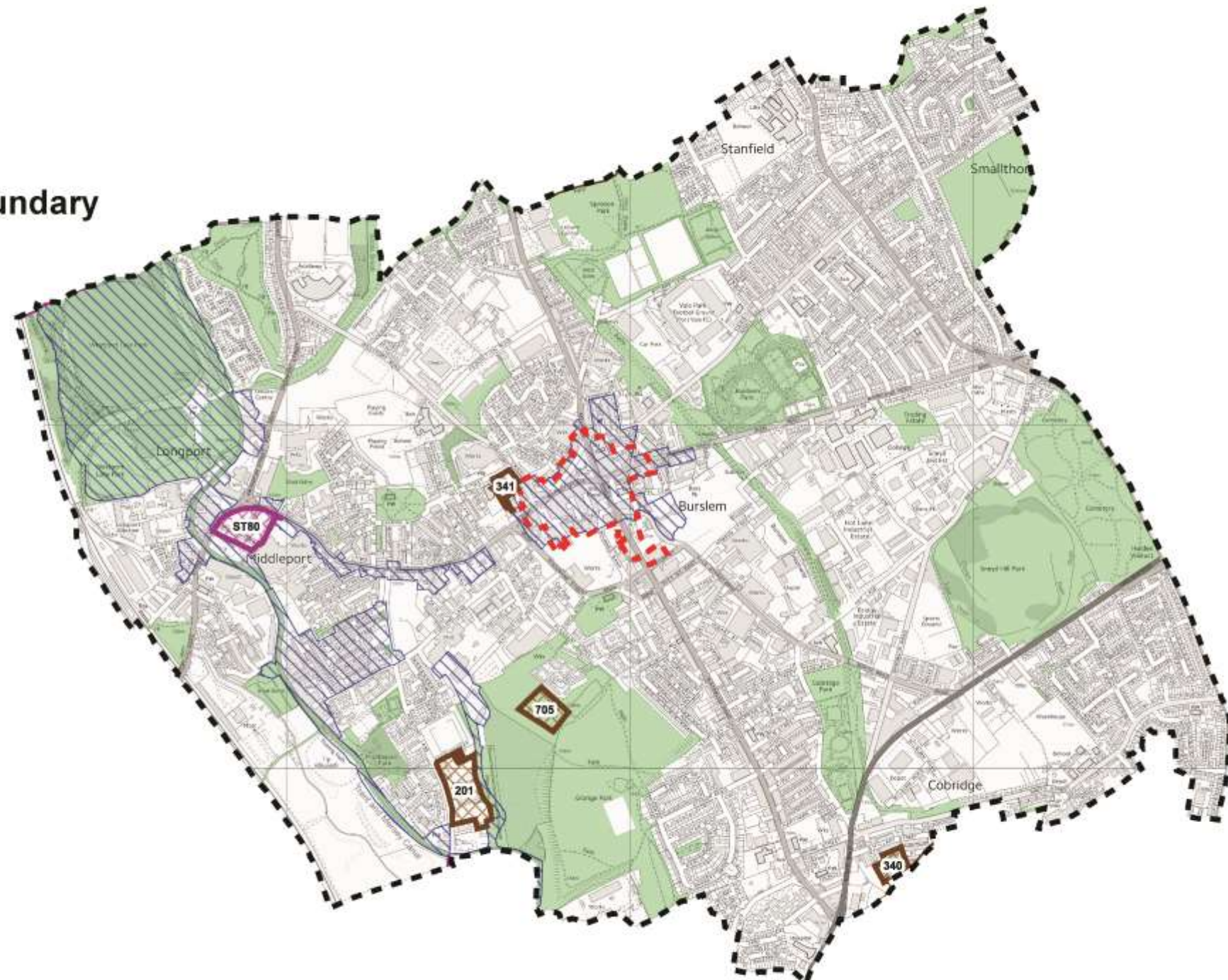


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Burslem and Moorcroft Character Area

KEY

-  Character Area Boundary
-  Proposed Town Centre Boundary
-  Green Belt
-  Conservation Areas
-  Green Space Options
-  Housing Options
-  Employment Options
-  Mixed Use Options



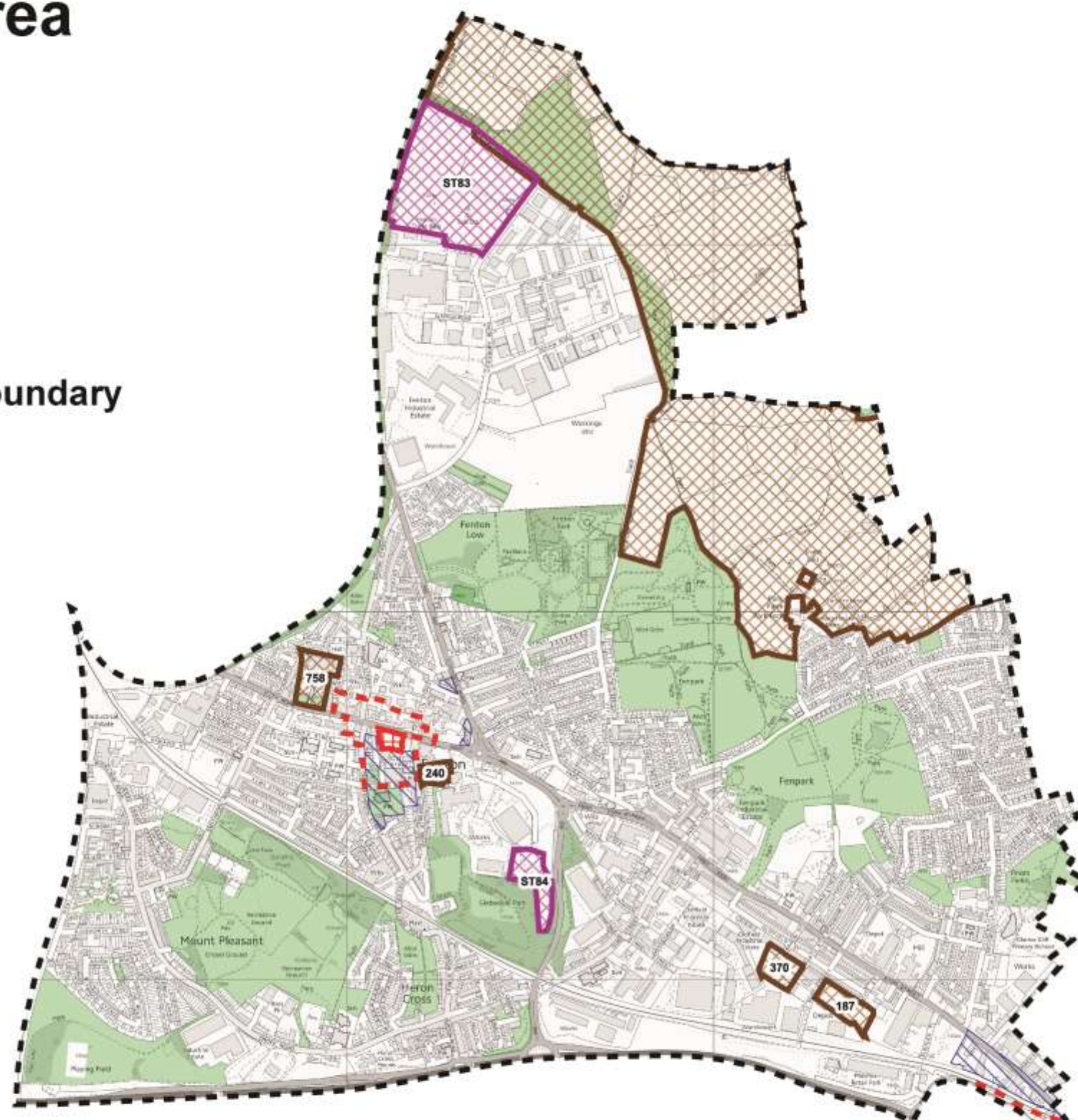
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Fenton Character Area

KEY

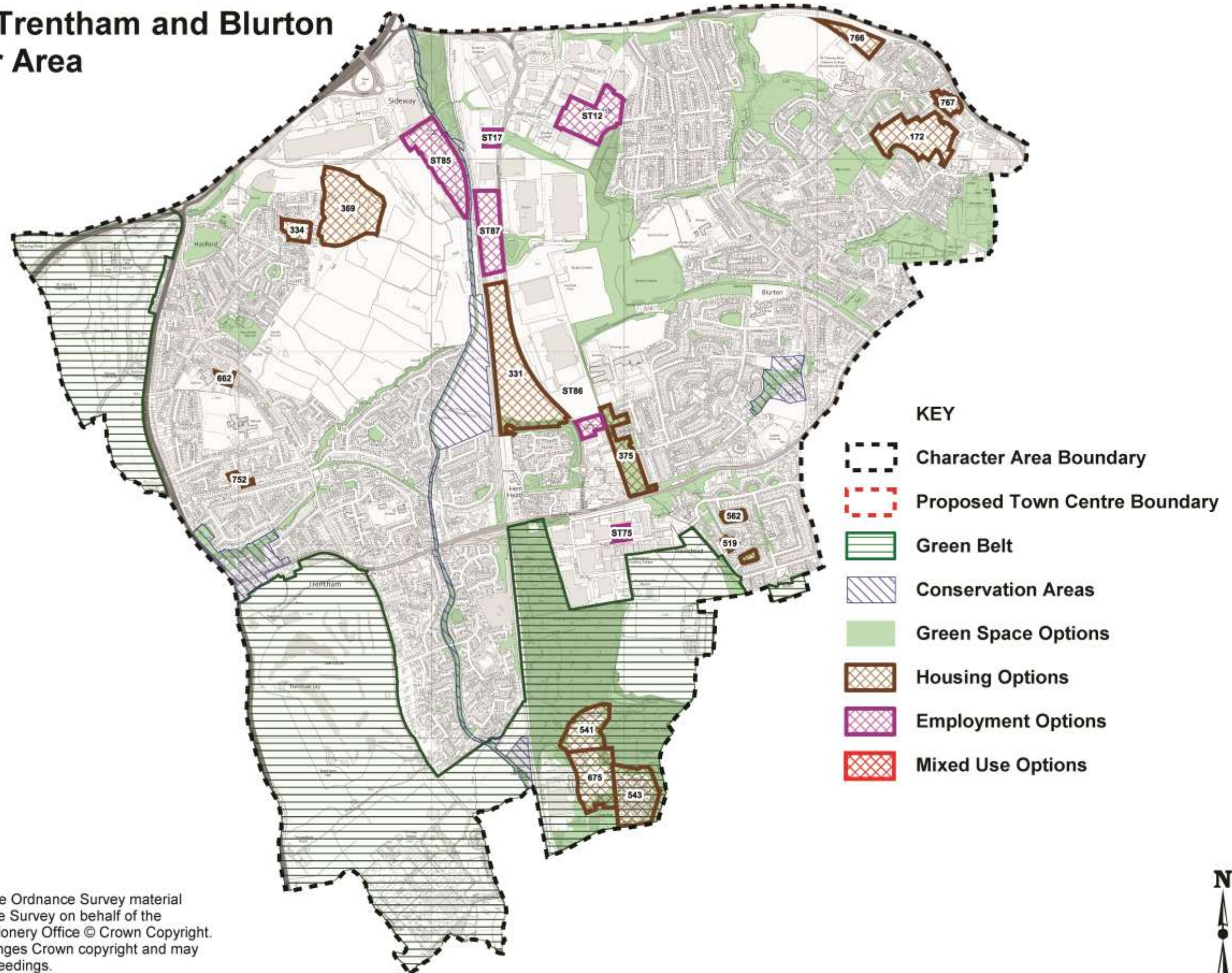
-  **Character Area Boundary**
 -  **Proposed Town Centre Boundary**
 -  **Green Belt**
 -  **Conservation Areas**
 -  **Green Space Options**
 -  **Housing Options**
 -  **Employment Options**
 -  **Mixed Use Options**



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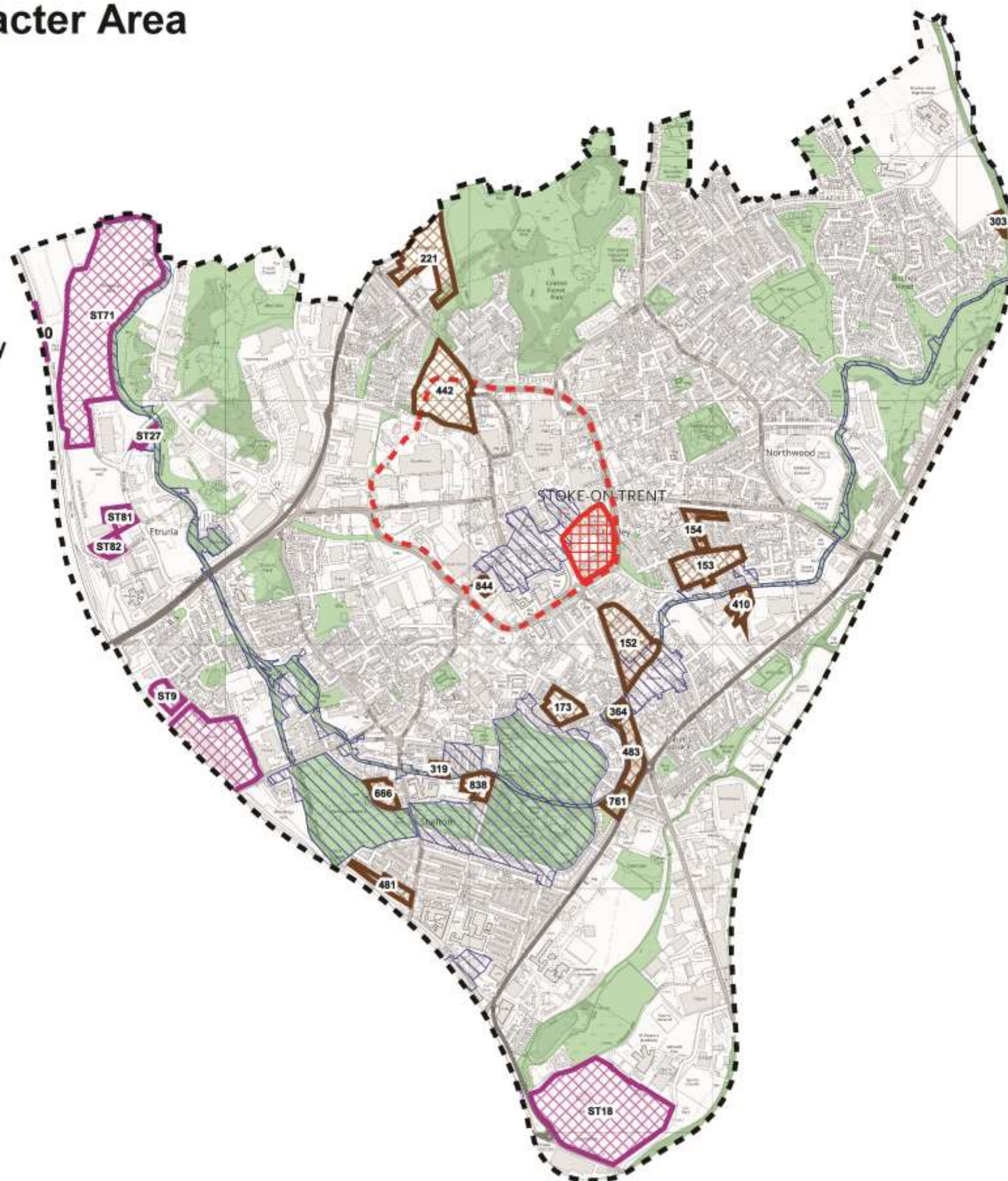
Hanford, Trentham and Blurton Character Area



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Hanley and Etruria Character Area

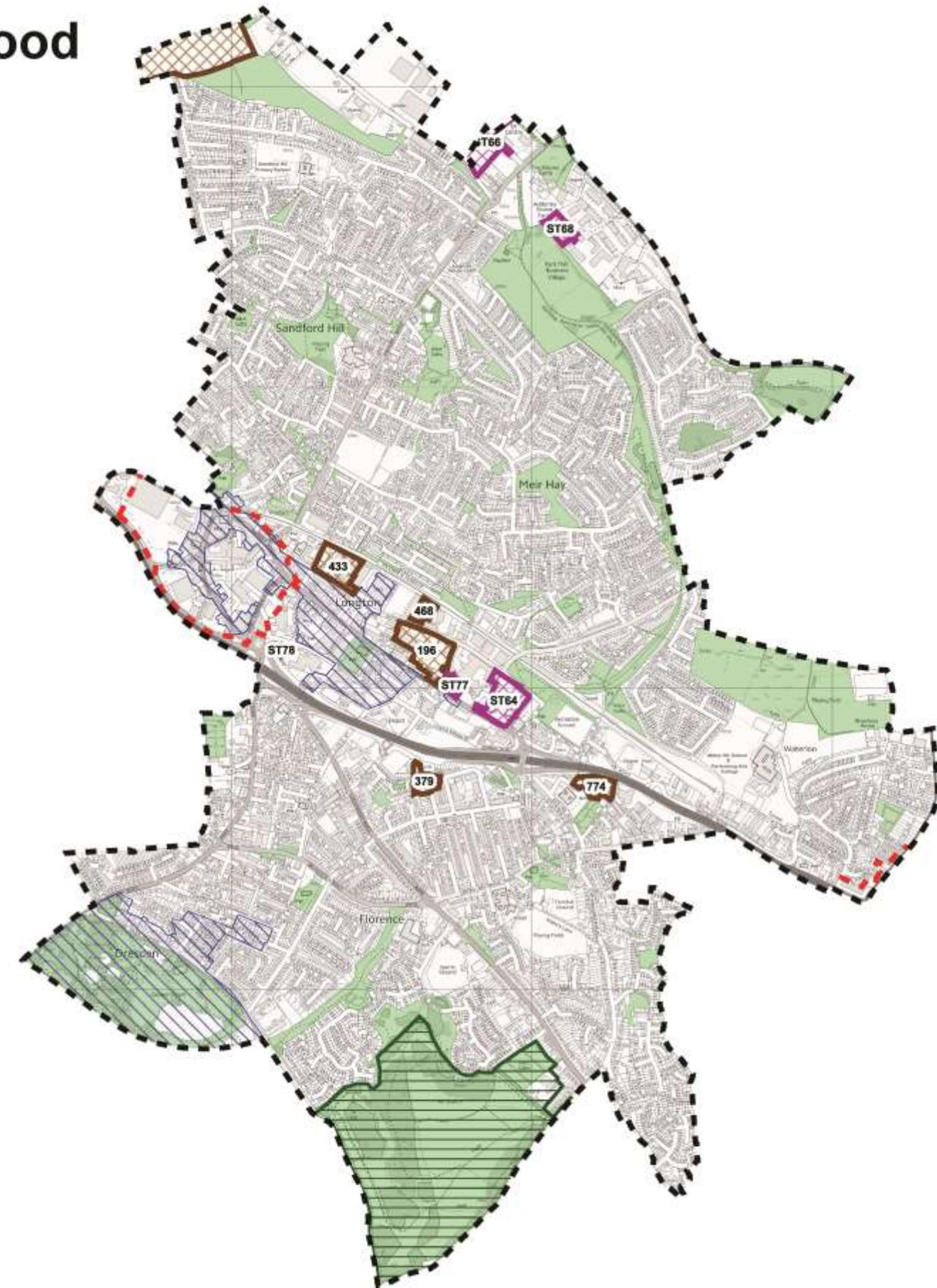
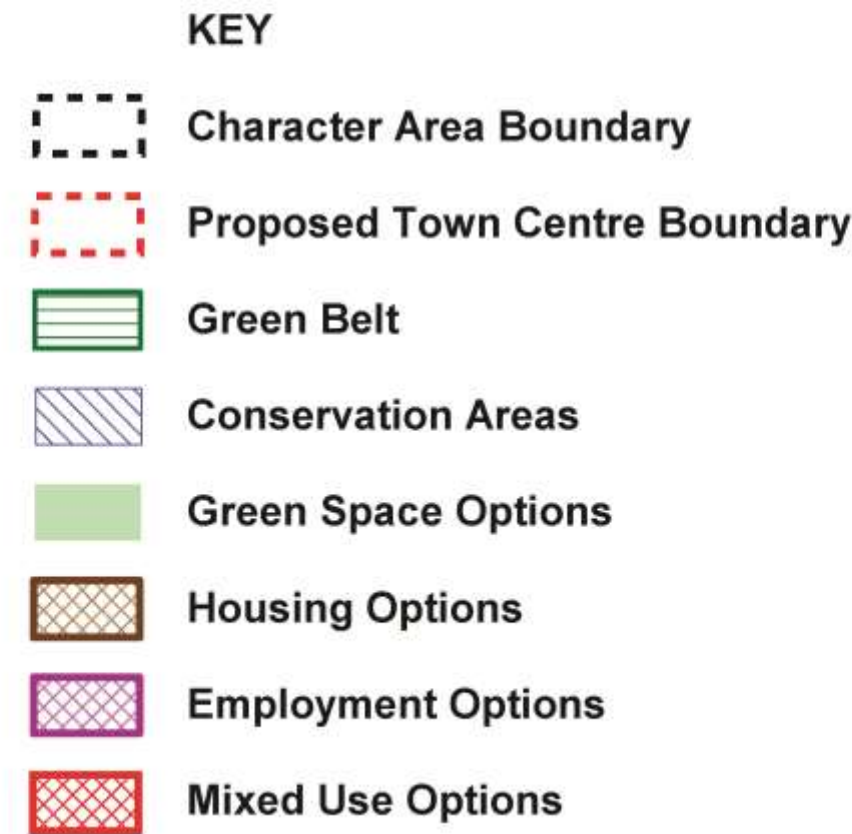
- KEY**
-  Character Area Boundary
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 -  Green Belt
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 -  Mixed Use Options



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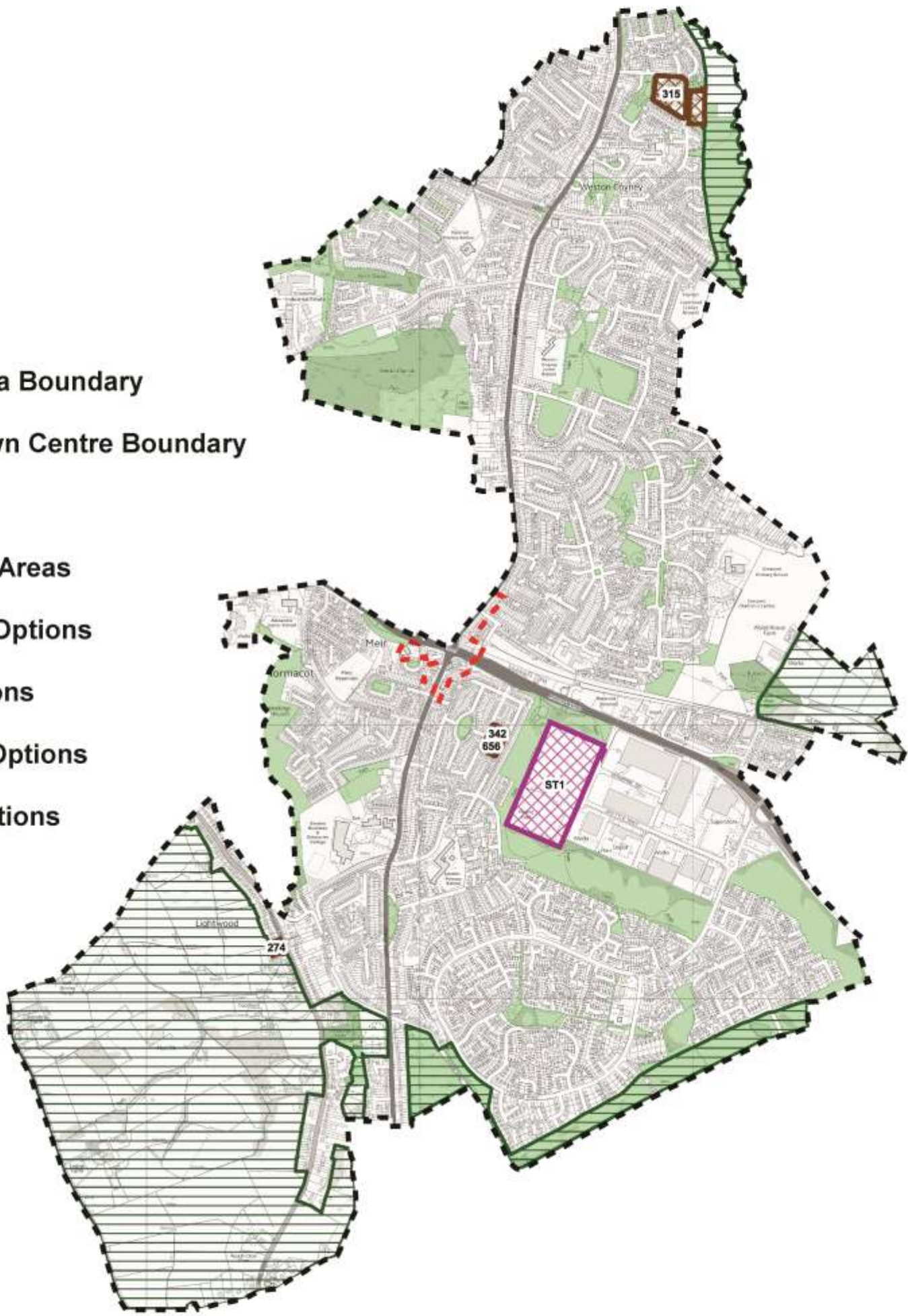
Longton, Dresden and Lightwood Character Area



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Meir and Weston Coyney Character Area

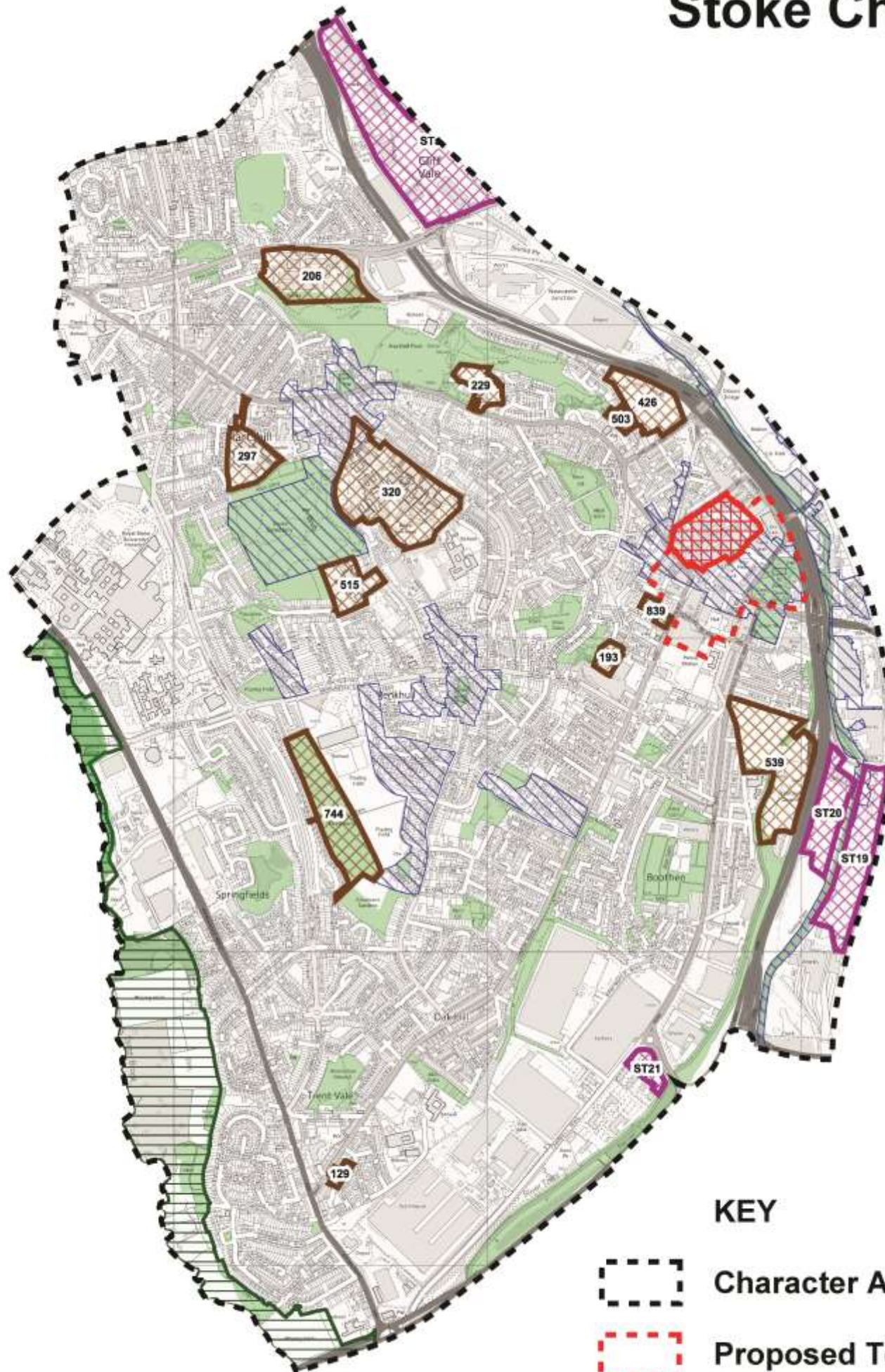
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 -  Green Belt
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 -  Green Space Options
 -  Housing Options
 -  Employment Options
 -  Mixed Use Options



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Stoke Character Area



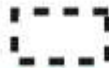







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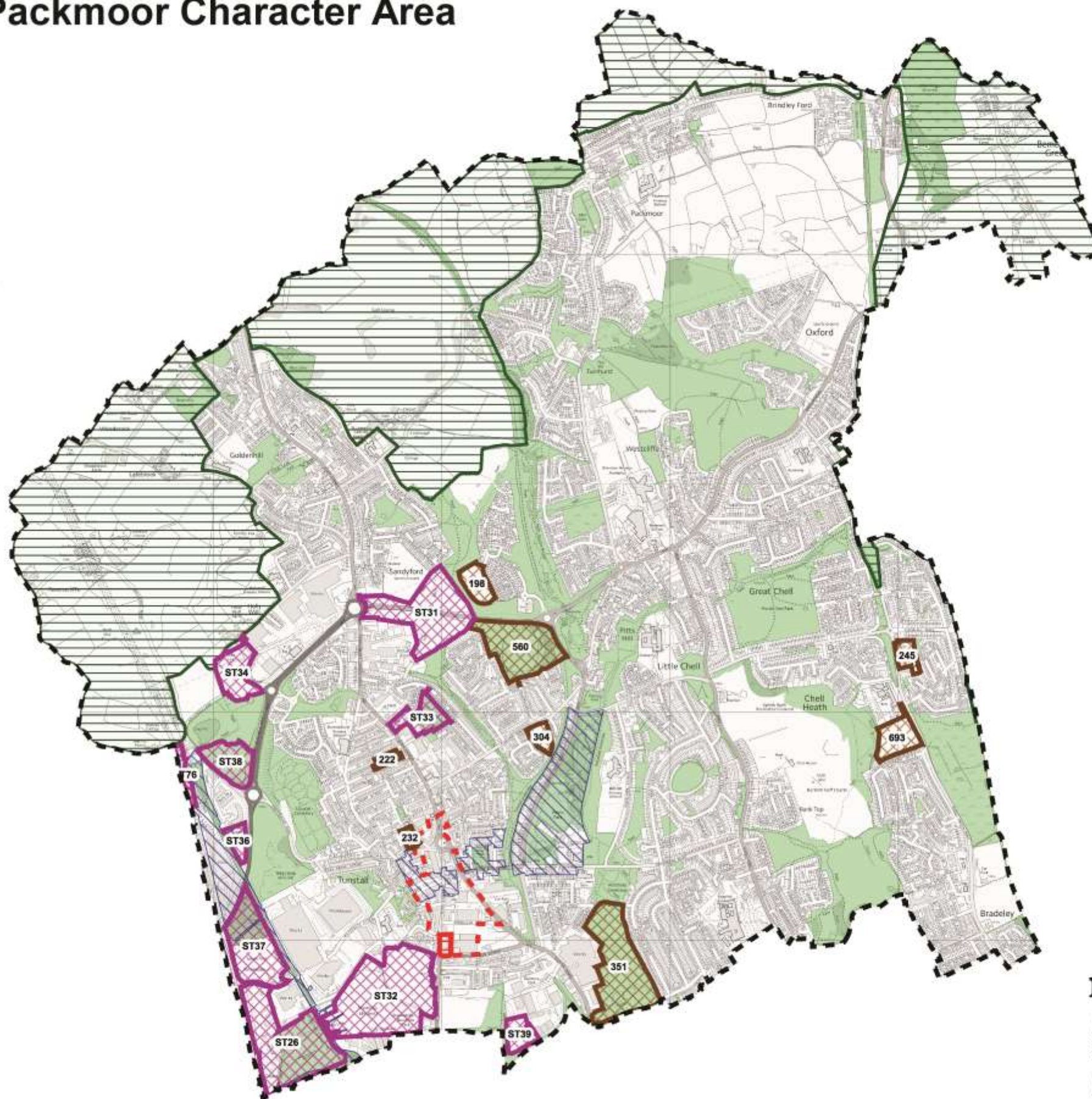
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-  Proposed Town Centre Boundary
-  Green Belt
-  Conservation Areas
-  Green Space Options
-  Housing Options
-  Employment Options
-  Mixed Use Options

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Tunstall, Goldenhill and Packmoor Character Area

- KEY**
-  Character Area Boundary
 -  Proposed Town Centre Boundary
 -  Green Belt
 -  Conservation Areas
 -  Green Space Options
 -  Housing Options
 -  Employment Options
 -  Mixed Use Options

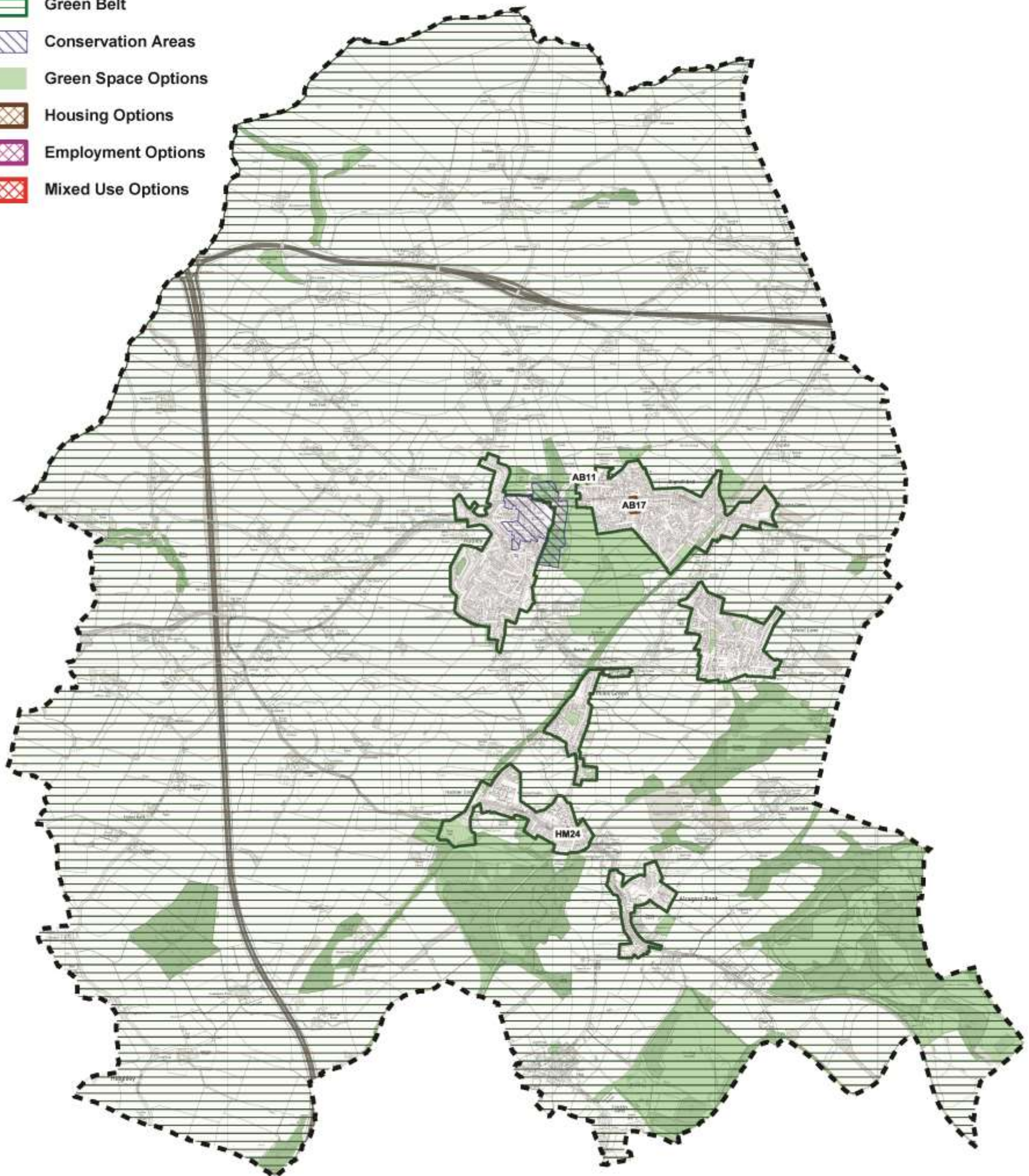


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Audley and Bignall End Character Area

KEY









-  Character Area Boundary
-  Proposed Town Centre Boundary
-  Green Belt
-  Conservation Areas
-  Green Space Options
-  Housing Options
-  Employment Options
-  Mixed Use Options

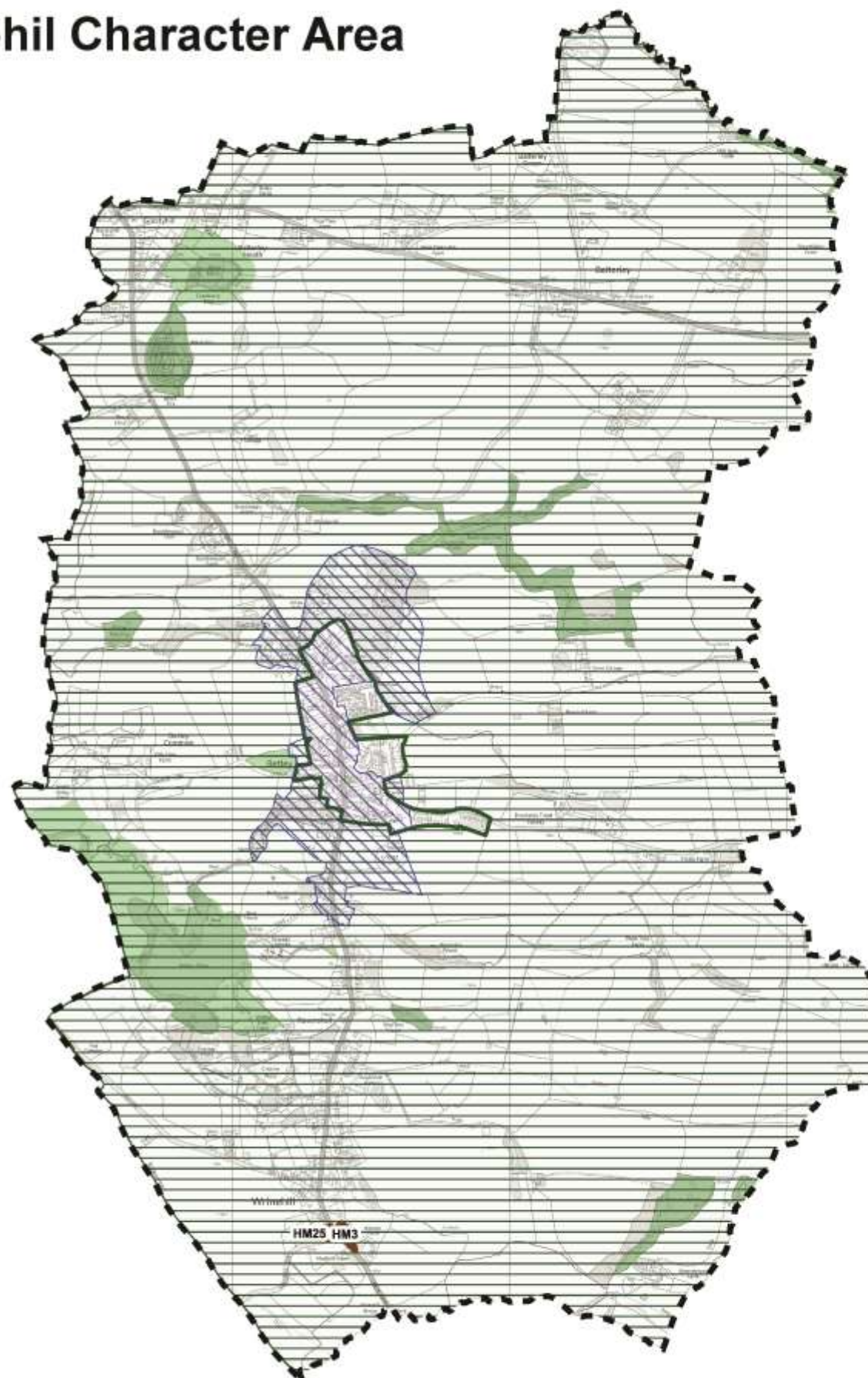


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Betley, Balterley and Wrinehil Character Area

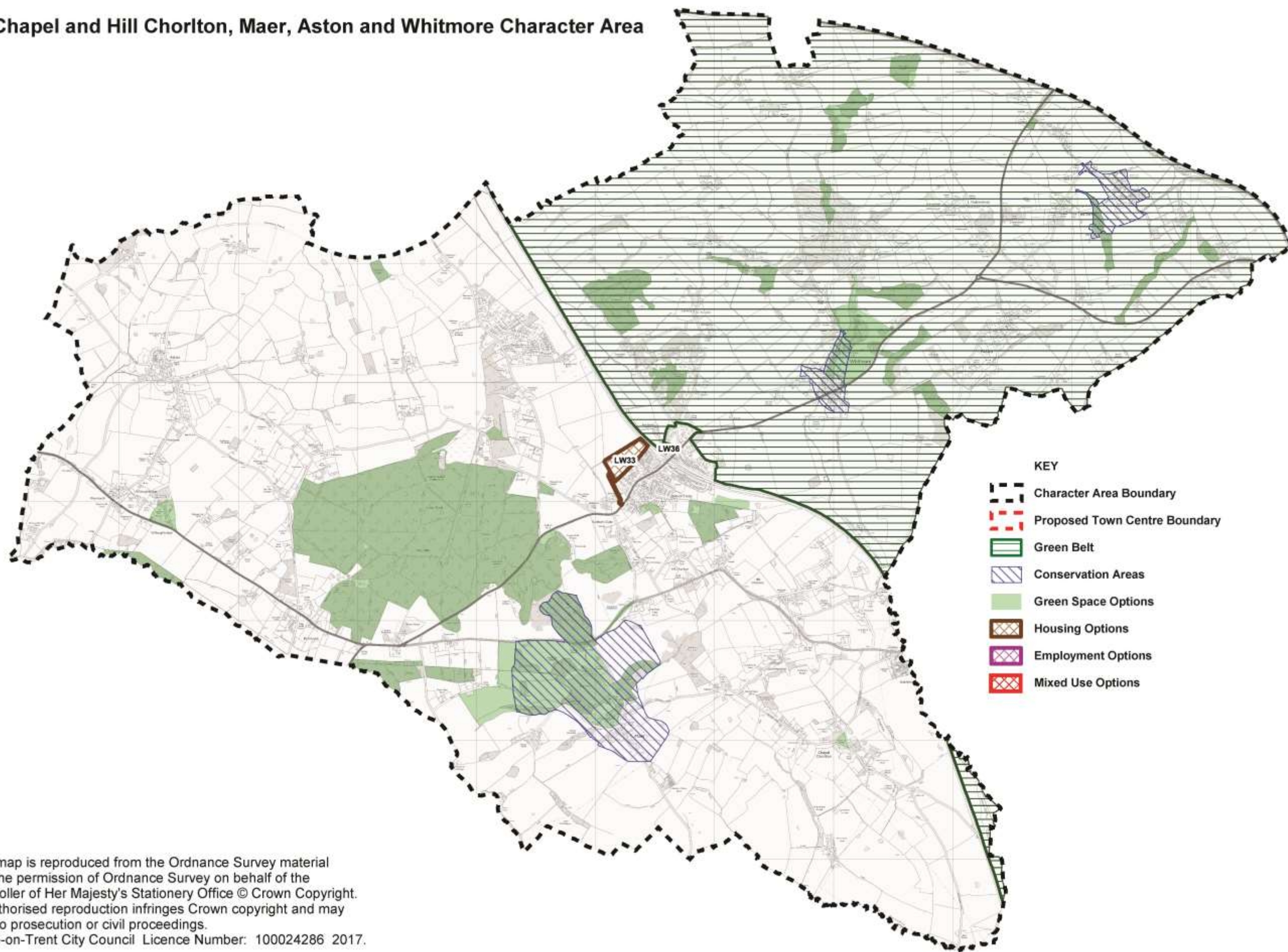
- KEY**
-  Character Area Boundary
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 -  Green Belt
 -  Conservation Areas
 -  Green Space Options
 -  Housing Options
 -  Employment Options
 -  Mixed Use Options



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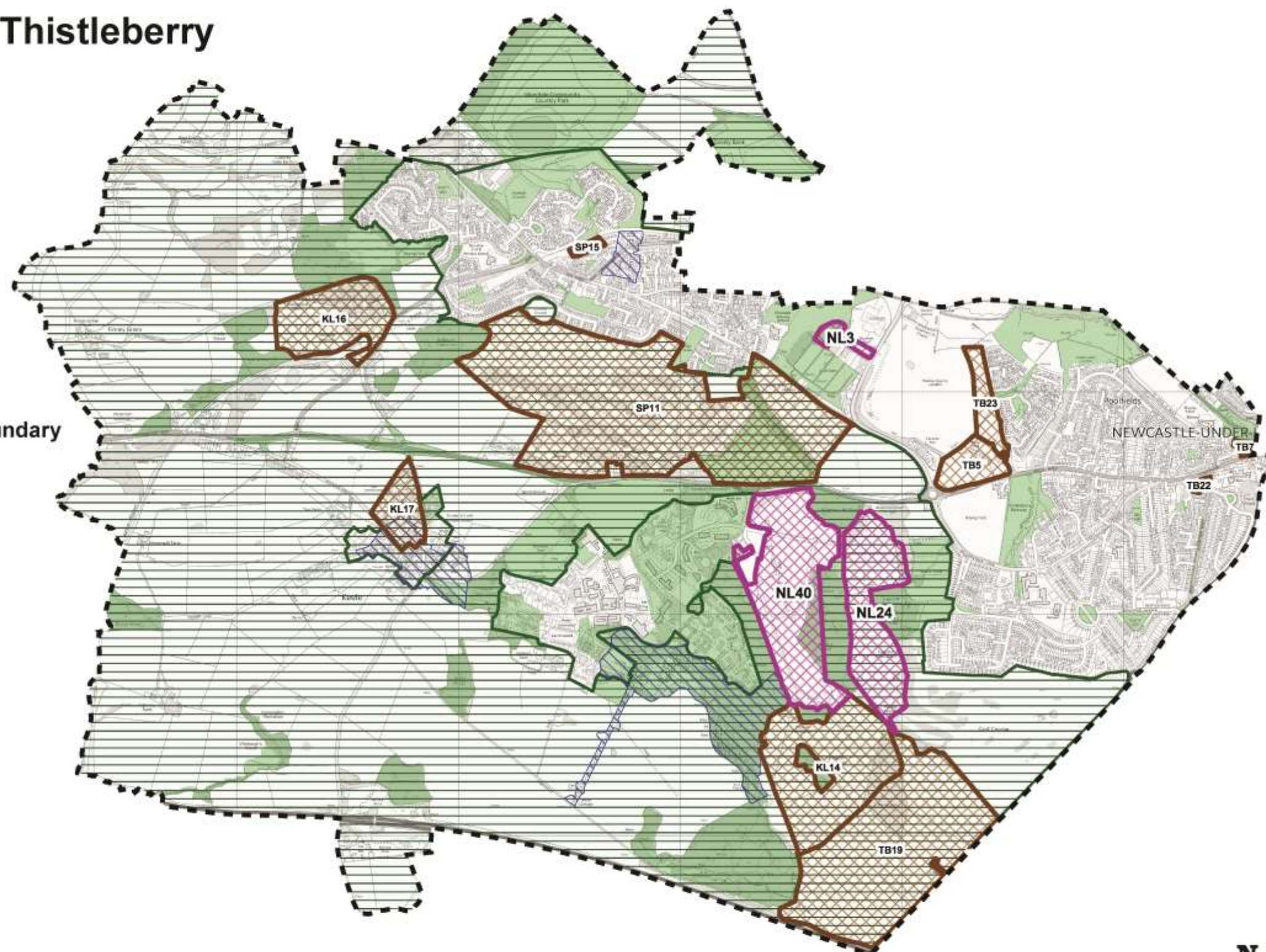
Chapel and Hill Chorlton, Maer, Aston and Whitmore Character Area



- KEY**
- Character Area Boundary
 - Proposed Town Centre Boundary
 - Green Belt
 - Conservation Areas
 - Green Space Options
 - Housing Options
 - Employment Options
 - Mixed Use Options

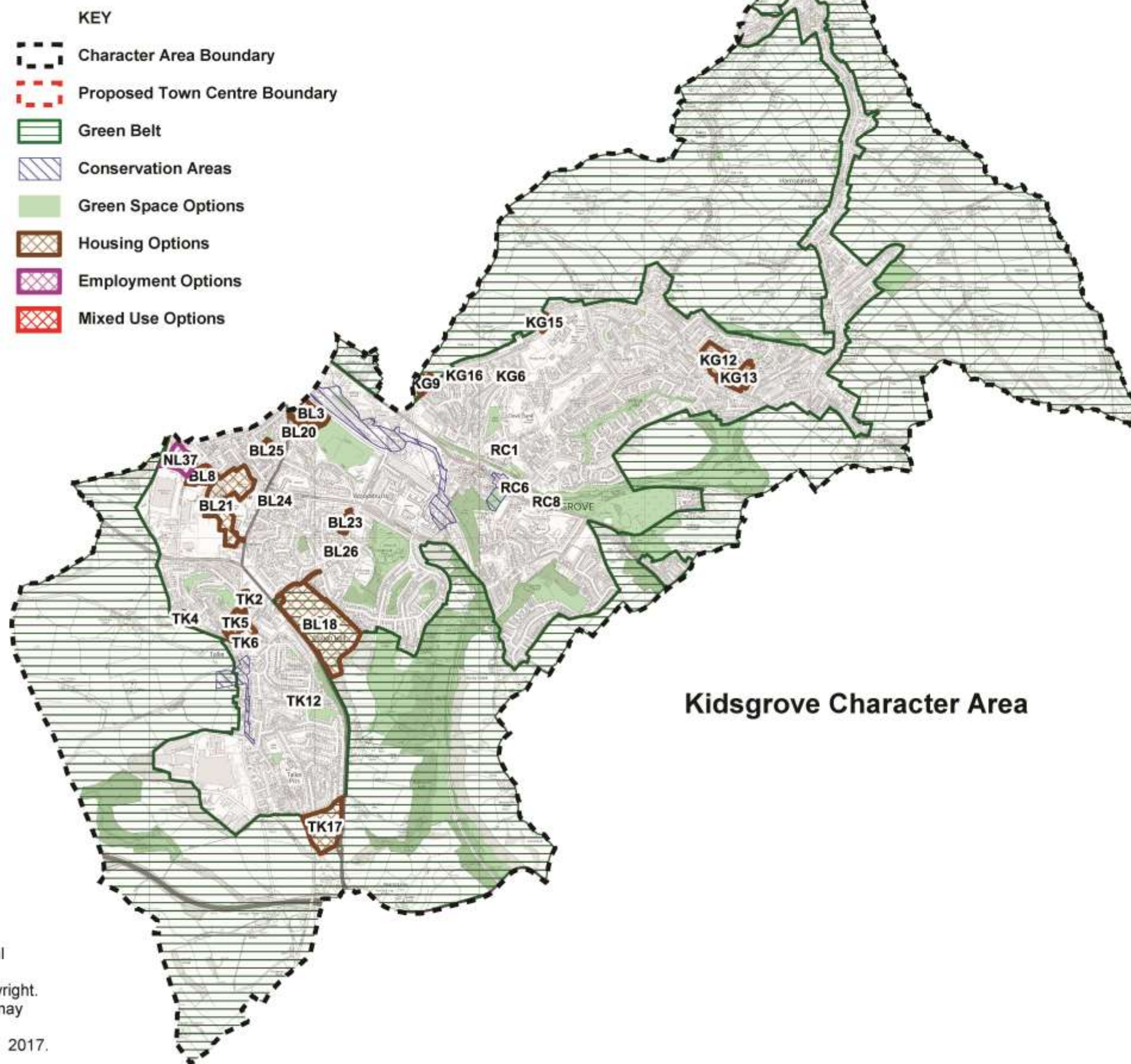
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Keele, Silverdale and Thistleberry Character Area



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Loggerheads Character Area











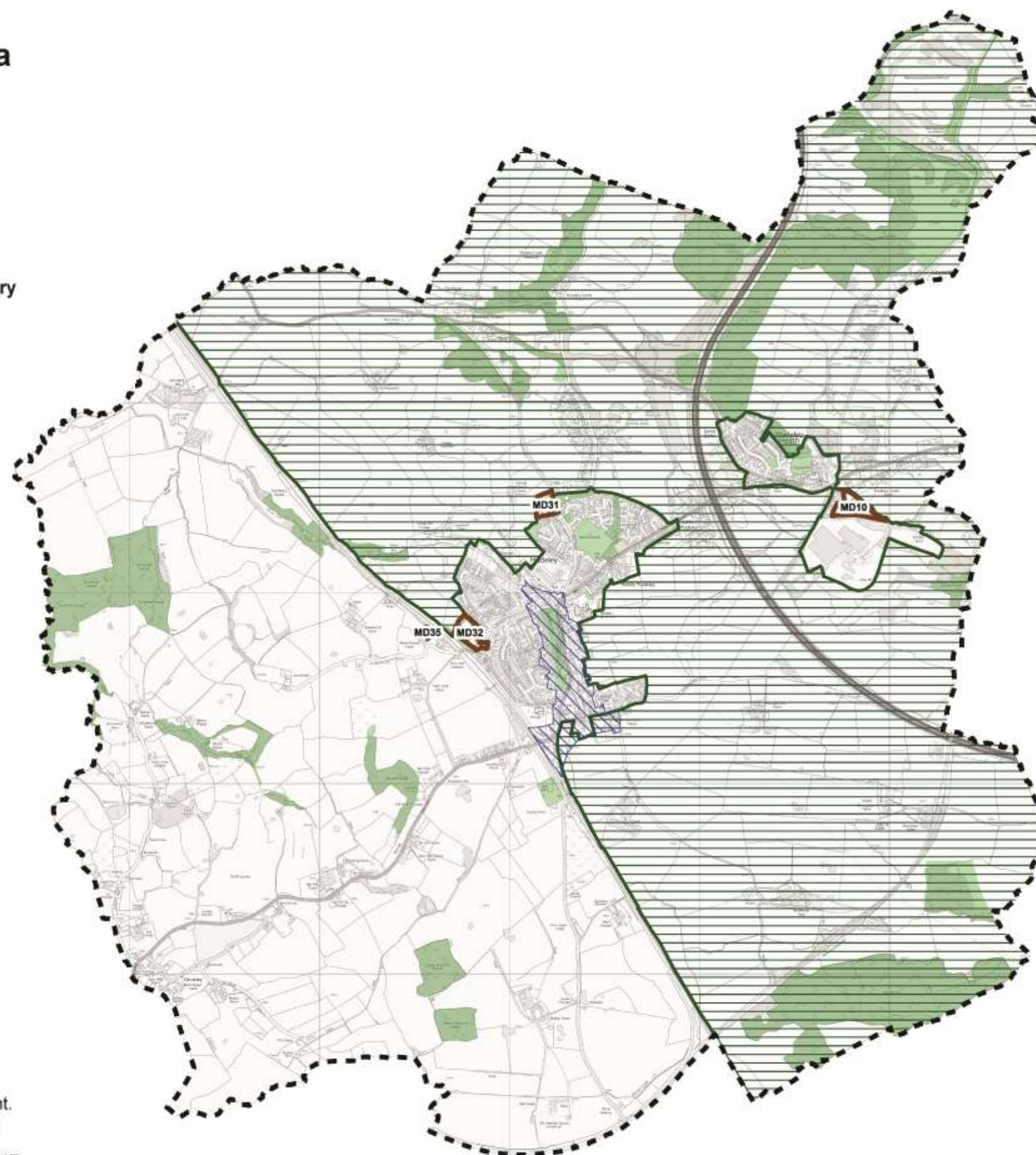
- KEY
- Character Area Boundary
 - Proposed Town Centre Boundary
 - Green Belt
 - Conservation Areas
 - Green Space Options
 - Housing Options
 - Employment Options
 - Mixed Use Options



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Madeley Character Area

- KEY**
-  Character Area Boundary
 -  Proposed Town Centre Boundary
 -  Green Belt
 -  Conservation Areas
 -  Green Space Options
 -  Housing Options
 -  Employment Options
 -  Mixed Use Options

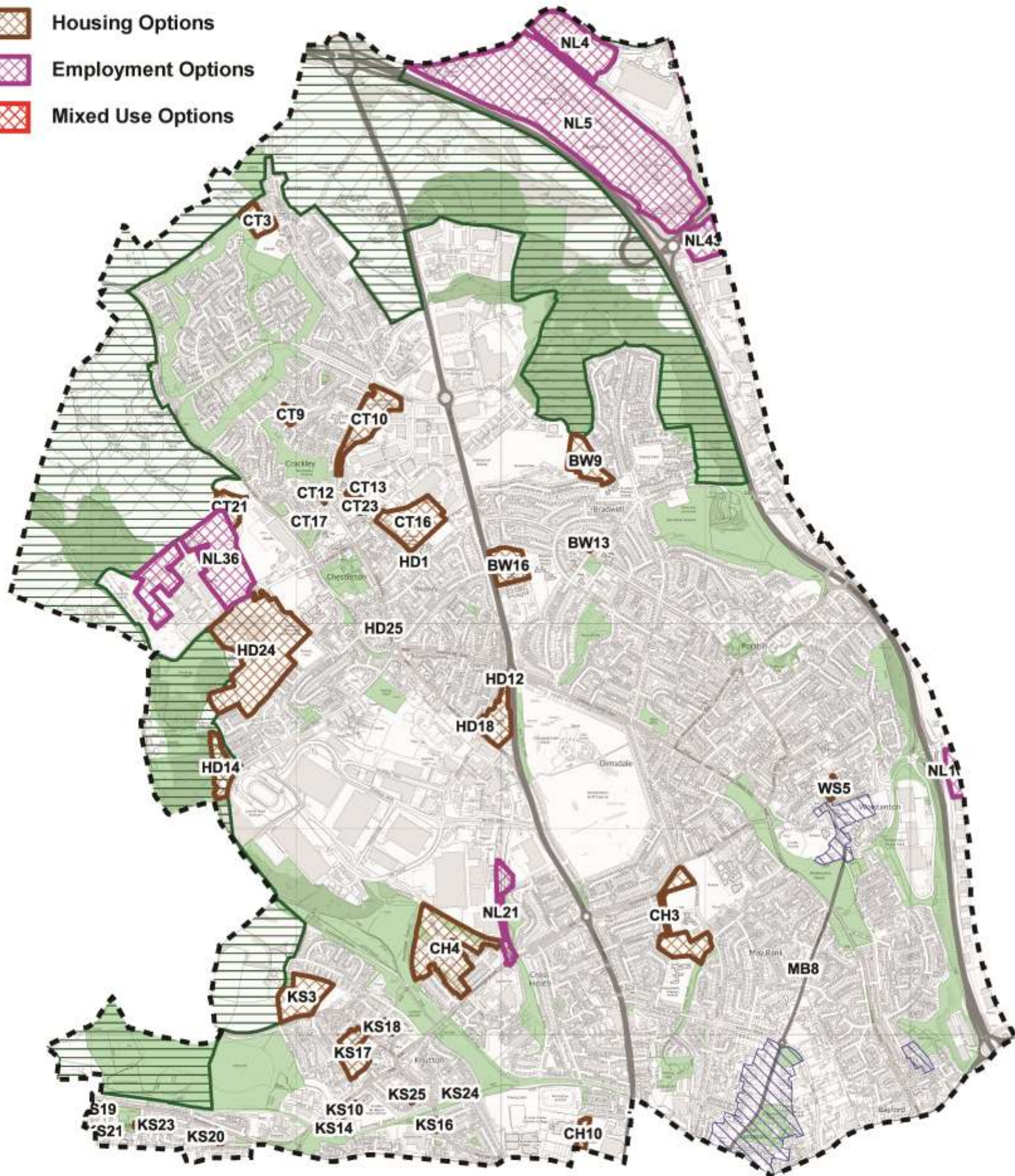


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Newcastle North Character Area

- KEY**
-  Character Area Boundary
 -  Proposed Town Centre Boundary
 -  Green Belt
 -  Conservation Areas
 -  Green Space Options
 -  Housing Options
 -  Employment Options
 -  Mixed Use Options



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Newcastle South Character Area

KEY

Character Area Boundary

Proposed Town Centre Boundary

Green Belt

Conservation Areas

Green Space Options

Housing Options

Employment Options

Mixed Use Options

The map displays the Newcastle South Character Area, bounded by a dashed black line. Within this area, several specific zones are highlighted:

- Proposed Town Centre Boundary:** Indicated by a dashed red line, primarily in the central-eastern part of the area.
- Green Belt:** Shown as areas with horizontal green hatching, located along the northern and eastern peripheries.
- Conservation Areas:** Represented by diagonal blue hatching, found in the south-eastern corner and a small patch in the west.
- Green Space Options:** Solid light green areas scattered throughout the urban landscape.
- Housing Options:** Brown cross-hatched areas, including WL15, WL2, WL6, WL7, WL9, and WL11.
- Employment Options:** Purple cross-hatched areas, notably a large one in the south-east.
- Mixed Use Options:** Red cross-hatched areas, including a small one in the north-east.

 Other labels on the map include 'Westlands', 'Clayton', 'Seabridge', and 'SB8'. A north arrow is positioned in the bottom right corner.

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Newcastle Town Character Area

KEY



Character Area Boundary



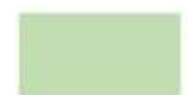
Proposed Town Centre Boundary



Green Belt



Conservation Areas



Green Space Options



Housing Options



Employment Options



Mixed Use Options



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Appendix 6 – Joint Local Plan Timetable

Stage		Progress/ Timeframe/ What it involves
Stage 1	Assembly of evidence base	Work on-going
Stage 2	SCI and stakeholder engagement	Statement of Community Involvement has been adopted and is available to view on our website.
Stage 3	Sustainability Appraisal (SA) Scoping Report	Draft SA Scoping Report consultation with statutory consultees completed in August/September 2015
Stage 4a	Issues Papers Consultation	Consultation completed February/ March 2016. The Issues consultation set out some of the key local and regional matters which could have a significant influence on how the area might change in the future.
		The consultation was accompanied by a series of technical papers which summarised the policy background and evidence driving the strategic issues.
Stage 4b	Strategic Options Consultation	This takes into account representations received as part of the Issues consultation and sets out the potential options and spatial requirements based on a range of issues including housing need and employment.
		Consultation July/August 2017
Current Stage → Stage 5	Preferred Option(s)	Prepare preferred option (s) which will take account of representations received as part of Strategic Options consultation and will reflect the preferred spatial options for the Joint Local Plan.
		Consultation December 2017/January 2018
Stage 6	Full Draft Joint Local Plan	Prepare full draft joint local plan which will take into account representations received as part of Preferred Option(s) and will set out fully the spatial proposals along with supporting planning policies. Consultation on the Full Draft Plan during November/December 2018.
Stage 7	Publication of draft Joint Local Plan-in accordance with Regulation 19 and 35 of the 2012 Regulations	Finalisation of the Full Draft Joint Local Plan by Cabinet which will have taken into account representations received as part of the Full Draft Joint Local Plan consultation and will set out the final plan to be submitted to Council for approval for formal publication. The Full Draft Joint Local Plan will then be submitted to full council for publication and consultation.

Stage		Progress/ Timeframe/ What it involves
		Publication consultation will take place during October/November 2019
Stage 8	Final Submission version of the Joint Local Plan and submission to the Secretary of State	<p>Following publication period both the City Council and Borough Council will review the responses received before submitting the Draft Joint Local Plan (and other documents) to the Secretary of State pursuant to Section 20 of the Planning and Compulsory Purchase Act 2004 and Regulation 22 of the 2012 Regulations. This will include copies of any representations received as a result of publication of the draft joint local plan and formal statement of representations made including those dealt with by the City Council and Borough Council and any main modifications automatically referred to the Secretary of State and to be dealt with as part of the examination process.</p> <p>This is provisionally timetabled for completion in April 2020.</p>
Stage 9	Public examination of joint local plan	Starts April 2020 (dependent on date of submission)
Stage 10	Adoption of Joint Local Plan	Dependent on Stage 9.

Appendix 7 – Glossary

Affordable housing: Comprises of social rented, affordable rented and intermediate housing for households whose needs are not met by the market. Social rented housing is owned and rented out to households by local authorities, private registered providers or other approved landlords. Affordable rented housing is let under similar arrangements but at no more than 80% of the local market rent. Intermediate housing comprises of homes for sale and rent and can include shared equity (shared ownership and equity loans) and other low cost homes for sale and intermediate rent.

Air Quality Management Areas: Areas designated by local authorities because they are not likely to achieve national air quality objectives within certain specified deadlines.

Ancient woodland: An area that has been wooded continuously since at least 1600 AD.

Brownfield land: see 'previously developed land'

Constellation Partnership (formerly known as the Northern Gateway Development Zone): a partnership between two Local Enterprise Partnerships (LEPs) and seven local authorities focused on delivering plan-led economic development. The partners are Cheshire and Warrington LEP, Stoke-on-Trent and Staffordshire LEP, Cheshire East Council, Cheshire West and Chester Council, Newcastle-under-Lyme Borough Council, Stafford Borough Council, Staffordshire County Council, Staffordshire Moorlands District Council and Stoke-on-Trent City Council. The agreed vision of the partnership is for a single economic footprint creating a coherent investment market boosted by the international investment magnet of High Speed Rail connectivity. This is promoted as an unbeatable growth opportunity for investors. The partnership's ambition is to deliver 100,000 new homes and 120,000 new jobs by 2040.

Core Spatial Strategy: The existing, overarching development plan document for Newcastle-under-Lyme and Stoke-on-Trent. It sets out the long-term spatial vision for areas, the spatial objectives and strategic policies and proposals to deliver that vision. The Core Spatial Strategy was adopted by both Councils in 2009 and will be replaced by the Joint Local Plan.

Development Management (decision-taking): A function of the respective Councils which considers and decides submitted planning applications against relevant planning policy and any other material considerations.

Development Plan/Development Plan Documents (DPDs): planning strategies and policies to direct the future development of an area. They include Local Plans and neighbourhood plans (as defined in section 38 of the Planning and Compulsory Purchase Act 2004) and are prepared by the local planning authority or qualifying neighbourhood plan body in consultation with the community.

Draft Local Plan: this stage of the plan production process follows on from this Issues consultation and the forthcoming Strategic Options stage. It is at this stage

that both Councils will present their preferred strategy and planning policy approaches to address the planning issues raised in this paper and any other issues that arise through the plan production process.

Duty to Cooperate: This is a legal requirement introduced by the Localism Act 2011. It requires that public bodies should engage constructively, actively and on an ongoing basis on strategic planning issues that cross administrative boundaries.

Ecological networks: sites and corridors of biodiversity importance that are linked together.

Economic development: Development that generates jobs and economic growth. This can include industrial uses, warehousing, offices, retail and leisure.

Employment Land Review: This is an evidential study that identifies different levels of economic and employment growth over the plan period and the amount, type and location of land that is best suited to meeting the projected levels of growth.

Enterprise Zone: areas designated by the government which have the backing of the local authority and Local Enterprise Partnership. Within these areas planning processes are streamlined, lower rates of tax are applied and there is greater investment in infrastructure (including superfast broadband) to better enable economic development to take place.

Evidence base: Up-to-date and relevant studies, data, information and analysis on the economic, social and environmental characteristics and prospects of the area to inform and support the preparation of the Local Plan.

Examination in Public: Before it can be adopted, a Local Plan must be examined by an independent inspector whose role is to assess whether the plan has been prepared in accordance with legal and procedural requirements, and whether it is considered 'sound'. To be 'sound' a document must be positively prepared, justified, effective and consistent with national policy.

Functional Economic Market Area (FEMA) – the geographical extent of a distinct local commercial property market. There is no standard approach to defining the extent of this area but it is possible to identify it by taking account of a combination of information sources such as transport networks, travel to work areas, housing market areas, administrative areas, areas covered by Local Enterprise Partnerships and the flow of goods, services and information within the local economy. The Employment Land Review (2015) takes information sources such as these into account and identifies that the local FEMA covers the administrative areas of Newcastle-under-Lyme and Stoke-on-Trent.

Green Belt: Designated areas of countryside surrounding large urban areas. These are designated to prevent urban sprawl, safeguard the countryside from encroachment, prevent towns from merging together, and preserve the setting and character of historic towns and to assist regeneration within the urban areas. Green Belt boundaries can only be amended when the local plan for the area is reviewed.

Green infrastructure: A network of multi-functional green space which is capable of delivering a wide range of environmental benefits and quality of life benefits for local communities. Green infrastructure can encompass both urban and rural areas.

Greenfield Land: Land that has not previously been developed (see entry for 'previously developed land'). This includes land currently or last used for agriculture and forestry and private garden land.

Heritage Asset: 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. Heritage asset includes designated heritage assets such as Scheduled Ancient Monuments, Listed Buildings, Registered Park and Gardens, Registered Battlefields or Conservation Areas as well as assets identified by the local planning authority (including local listing).

Historic environment: All aspects of the environment resulting from the interaction between people and places through time, including all surviving physical remains of past human activity, whether visible, buried or submerged, and landscaped and planted or managed flora.

Housing Market Area: this is the area within which the local housing market operates. The extent of the Housing Market Area is defined within the Strategic Housing Market Assessment (see separate entry below).

Intermediate Housing: A type of affordable housing (see 'affordable housing')

Local Enterprise Partnership (LEP): A body, designated by the Secretary of State for Communities and Local Government, established for the purpose of creating or improving the conditions for economic growth in an area. The body that covers Newcastle-under-Lyme and Stoke-on-Trent is the Stoke-on-Trent and Staffordshire Local Enterprise Partnership.

Local Nature Partnership (LNP): A body, designated by the Secretary of State for Environment, Food and Rural Affairs, established for the purpose of protecting and improving the natural environment in an area and the benefits derived from it.

Local Plan: The Joint Local Plan is being prepared by the city council and borough council to guide future development across the two local authority areas. The final, adopted version of this development plan document will detail the strategy for development across the two areas up to 2033 and will contain detailed policies which Stoke-on-Trent City Council and Newcastle-under-Lyme Borough Council will use to manage future development.

Local Planning Authority: The public authority whose duty it is to carry out specific planning functions for a particular area, such as creating planning policies or deciding planning applications. Stoke-on-Trent City Council and Newcastle-under-Lyme Borough Council are the local planning authorities for their respective areas.

Main town centre use: Retail development, leisure, entertainment facilities, offices, arts, culture and tourism development. Examples include shops, cinemas, restaurants, bars and pubs, night-clubs, casinos, health and fitness centres, indoor

bowling centres, bingo halls, theatres, museums, galleries, hotels and conference facilities.

Mineral Safeguarding Area: An area covering known deposits of minerals which are desired to be kept safeguarded from unnecessary sterilisation by non-mineral development. In the Joint Local Plan area Stoke-on-Trent City Council and Staffordshire County Council are responsible for designating Mineral Safeguarding areas.

Monitoring: Involves the collection and analysis of data and statistics to understand how patterns of development are changing. An example of this is the collection of housebuilding statistics. Monitoring data can show how effective planning policies are in influencing development. Such information is reported by local planning authorities in their Authority Monitoring Report (AMR).

National Planning Policy Framework (NPPF): The Government's planning policies for England, which provide a policy framework that sets the parameters under which Local Plans and Neighbourhood Plans should be prepared, and decisions on planning applications should be made.

National Planning Practice Guidance (NPPG/PPG): The Government's more detailed online guidance on national planning policies, which adds further detail to the NPPF.

Neighbourhood Plans: Development plan documents which can be prepared by local communities, such as neighbourhood forums, business forums or parish and town councils. Neighbourhood Plans must conform to the strategic development priorities of the Local Plan but can shape and direct local development within their neighbourhood area.

Objectively Assessed Housing Need (OAN): also called a 'full, objective assessment of housing needs' (FOAN), this is an assessment undertaken within the Strategic Housing Market Assessment (see separate entry below) which identifies the extent of the need for new housing, without being influenced by planning matters such as the ability of the land supply to accommodate the levels of development – these matters are considered within the Local Plan preparation process.

Open space: Space of public value, including not just land, but also areas of water (such as rivers, canals, lakes and reservoirs) which offer important opportunities for sport and recreation and can act as a visual amenity.

Out of centre: A location which is neither within nor on the edge of a town centre.

Parish and town councils: Elected local authority bodies responsible for civil parishes. Parish and town councils have the ability to be designated as bodies to produce Neighbourhood Plans for their local areas.

People with disabilities: People have a disability if they have a physical or mental impairment, and that impairment has a substantial and long-term adverse effect on their ability to carry out normal day-to-day activities.

Planning policy (plan-making): A function of local planning authorities that prepares planning policies and development plan documents to direct decisions on development proposals within the authority's area.

Pollution: Anything that affects the quality of land, air, water or soils and which might lead to an adverse impact on human health, the natural environment or general amenity. Pollution can arise from a range of emissions, including smoke, fumes, gases, dust, steam, odour, noise and light.

Previously developed land: Land which is or was occupied by a permanent structure. This excludes land occupied by agricultural or forestry buildings, restored land previously used for minerals extraction or landfill and private residential gardens.

Primary shopping area: Area in a town or city centre that is defined within planning policy documents where retail development is concentrated as the dominant use in that location.

RAMSAR Site: Wetlands of international importance, designated under the 1971 Ramsar Convention.

Regional Spatial Strategy (RSS): Previously a development plan document prepared at the regional level to direct the development strategy that local authority development plans were to conform with. Regional Spatial Strategies were revoked by the Localism Act 2011 and no longer apply.

RENEW North Staffordshire: This was an organisation that was set up to coordinate the renewal of the housing market in North Staffordshire as part of the previous government's Housing Market Renewal Pathfinder programme. This programme ended in.

Renewable and low carbon energy: Includes energy for heating and cooling as well as generating electricity. 'Renewable' covers sources of energy that occur naturally and repeatedly, for example wind, water, sun and also biomass and geothermal heat from below the ground. Low carbon technologies are those that can help reduce emissions (compared to conventional use of fossil fuels).

Retail Impact Threshold: The National Planning Policy Framework sets out that under the retail impact assessment test, local authorities should require an impact assessment if a proposed development is over a locally set floorspace threshold. If an application for out of town development fails to satisfy this test it should be refused.

Saved policies: Older local plan policies that can remain in place following a direction given by the Secretary of State under the Planning and Compulsory Purchase Act 2004. A list of currently saved policies in Newcastle-under-Lyme or Stoke-on-Trent is available on the websites of either authority.

Site allocation: a site designated within a development plan document for a specific type of use. For example, housing, employment or retail development.

Site of Special Scientific Interest (SSSI): Sites designated by Natural England under the Wildlife and Countryside Act 1981.

Social housing, or social rented housing: A type of affordable housing (see 'affordable housing')

Statement of Community Involvement (SCI): A document adopted by a local planning authority which describes how the public, business and interest groups within a local authority area can get involved in plan-making and the decision-taking.

Strategic Economic Plan (SEP): this is a document produced by the Local Enterprise Partnership (LEP – see separate entry above) which sets out the vision, aims and objectives for economic growth within the LEP area.

Strategic Housing Land Availability Assessment (SHLAA): this is an assessment of sites across a local planning authority area that may be capable of accommodating housing development. It is an assessment of all known sites in the area but it does not constitute a council's view on which sites should or should not be developed for housing. The assessment is intended to identify whether or not sites are suitable, available and achievable for housing development.

Strategic Housing Market Assessment (SHMA): this is an evidential study that examines the extent and the operation of the local housing market. It also identifies the extent of the housing needs that exist or are likely to arise within the defined housing market area.

Strategic Options: this is the next stage in preparing the Joint Local Plan. At this stage the different ways that the issues identified within this paper can be addressed will be explored. For example this could include identifying how much development could be accommodated in different areas within both authorities. No particular solution will be fixed at this stage as this will be done within the draft local plan. Further issues to consider may however be identified at the Strategic Options stage.

Submission: this is when the final version of the Joint Local Plan will be sent to the Secretary of State to be subject to an independent Examination in Public. There will be a final round of public consultation prior to submission and any resulting comments received will be considered by the appointed Planning Inspector who will oversee the Examination.

Supplementary Planning Documents (SPDs): documents which add further detail to policies contained within Development Plan Documents. They can be used to provide further guidance for development on specific sites, or on particular issues, such as design.

Sustainability Appraisal: An assessment of the impacts of policies and proposals on economic, social and environmental objectives, i.e. 'sustainable development'.

Sustainable development: Development which contributes to meeting the long term economic and social needs of the community, whilst balancing this against the need to avoid creating an unacceptable long term impact on the environment.

Sustainable transport: Any efficient, safe and accessible means of transport with overall low impact on the environment, including walking and cycling, low and ultra low emission vehicles, car sharing and public transport.

Viability: Refers to the financial implications of development. If the costs of development do not allow for a sufficient financial return to the developer then the development will not be viable. Viability can be affected by the costs of developing the land, the costs of providing wider benefits such as open space or affordable housing, and the sale value of the completed development.

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DRAFT

Stoke-on-Trent and Newcastle-under-Lyme Joint Local Plan Strategic Options Consultation and Responses Document

Working together to shape the future of our area



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If you have any queries about this document or the Joint Local Plan please contact as follows:

https://www.stoke.gov.uk/info/20071/joint_local_plan

<https://www.newcastle-staffs.gov.uk/all-services/planning/planning-policy>

Telephone: [01782 236339](tel:01782236339)

Email: localplan@stoke.gov.uk

1 Introduction

- 1.0 The Joint Local Plan Strategic Options Consultation document was subject to consultation between 17 July and 22 August 2017. The main report was supported by a summary guide, technical papers and evidence based documents.
- 1.1 The consultation was publicised widely and included exhibitions and workshops. 137 responses were received. Consultees who responded included residents; developers; land owners; housing associations; parish councils; university; neighbourhood planning groups and statutory providers.
- 1.2 This report sets out all the consultation responses along with the initial response from Planning Officers. The responses will be taken into account in producing the Preferred Options Consultation document which is the next stage in the Joint Local Plan development process.
- 1.3 A statistical breakdown of responses is show in Table 1.

2 Key Messages

- 2.0 The key messages arising from the consultation are as follows:

Vision

- Include reference to being an area where you can learn and visit.
- Be clear about growth and the relationship to innovation, high quality employment; housing and prosperity.
- Make clear distinction about historic built heritage; natural environment and landscape.
- Reflect climate change; culture; healthy communities.
- Newcastle and Stoke are two distinct entities.

Aims and Objectives

Aim 1 – Innovation and Investment

- Include explicit link between housing growth expectations and type of job and skills growth that is required.
- Include reference to fostering innovation in the science and technology sectors.
- Provide a broader regenerative context.
- Be more specific in terms of sectors for employment growth and linked to highly skilled jobs/focus towards education.
- Links to transport connectivity / HS2.

Aim 2 – Healthy and Active Communities

- Include specific reference to quality housing.
- Include reference to air quality and benefits of trees, greenspace and parks.
- Clearer reference about demographic changes (increase in elderly / extra care requirement and release of general market housing).
- Recognise viability and reference infrastructure delivery and viability.

Aim 3 – Dynamic and Diverse Neighbourhoods

- Be more specific - reference a broad range of housing types, forms, sites and locations (past trends will not address future requirements particularly because of the nature/speed of changing demographics).

Aim 4 – Natural Assets and Resources

- NPPF does not prioritise brownfield development over undeveloped land the emphasis is on sustainable development and no longer uses the term protect in relation to the countryside.
- “To recognise the value of, and encourage the reuse of sustainable brownfield land taking into consideration the need for development and the potential environmental and ecological impacts”.
- Mention role of trees and woodlands (plant more trees and woodland).

Aim 5 - Centres

- Edge of centre locations should be supported.
- Should not support 6 towns – Fenton, Burslem and Meir are no longer market hubs.
- Agree with strengthening the city centre.

Aim 6 - Heritage

- Incorporate culture and sport.
- Heritage should be recognised as contributing to the other aims as well.

Housing Growth

- There was a balanced view over the growth options. A large amount of developers/landowners responded who were keen for the amount of dwellings to be set at the highest level (option D). Some suggested that the level set should however be a minimum. Members of the public that responded suggested there should be caution in setting a number that overly ambitious and may not be deliverable, preferring options A-C.
- Some noted that they considered the OAN number to be set at too high a level and considered the evidence needed to be reviewed. With comments questioning where the extra workers will come from and how any changes in migration will affect neighbouring areas.

- There was a consensus that there were some areas that needed housing more than others and the bigger issue was the location of housing rather than the amount, supporting the local area and the economy where appropriate. Impact upon protected sites, infrastructure, green space, need considering.
- Businesses that responded suggested that the areas economic potential should be maximised, through development. With others stating that the economic development needs to come before the housing development, balancing commuting and retaining workers.
- Members of the public raised issues that the development of the brownfield sites should come first delivering the regeneration of the areas, and bringing empty properties back in to use, along with the development of culture in the area.
- Some comments referred to how the growth is delivered being a more relevant issue, such as the type of housing including the amount of affordable housing, the number of Gypsy and Traveller Pitches, the density and location of development.
- Concerns were raised over the non-implementation of certain sites and how this would be allowed for, with for example an over allocation or reserve sites. Comments were also received from City of Stoke-on-Trent Council's Housing Growth team discussing the various delivery mechanisms they are currently working on to deliver problem sites.

Employment Growth

- The Councils should be aspiring to deliver maximum economic growth to attract investment and higher paid employment to the area.
- There could be greater pressures on infrastructure from new development.
- The importance of locating housing near to employment to reduce the need to travel.
- Importance of education, training and skills both to the local economy and to uplift the ability of the local workforce to enable them to aspire to and secure a better paid job.
- Necessary to consider the impacts arising from HS2 as soon as evidence becomes available.

Broad Locations

- The biggest support from the representations received was for Broad Location Option 6. Supporters of option 6 stated that options 1-4 were not able to meet the objectively assessed needs and that option 5 would deliver development far in excess of what was needed.

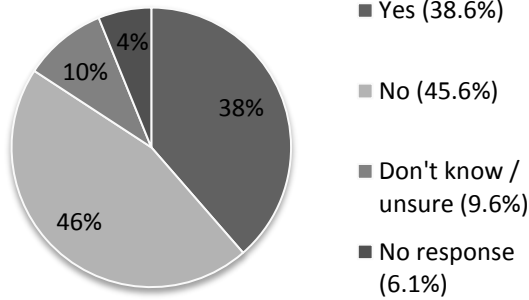
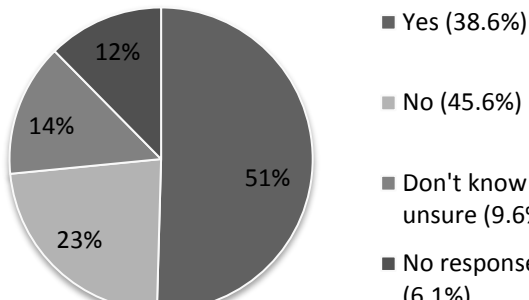
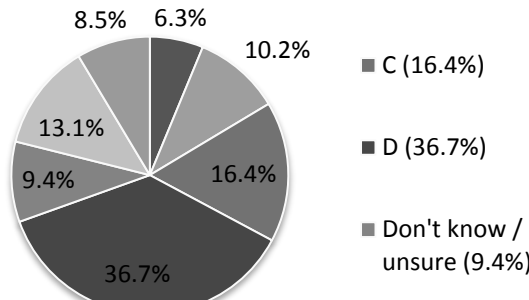
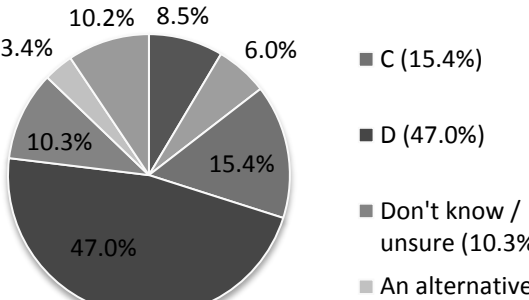
- Option 6 was also seen as providing an appropriate balance between accommodating higher levels growth which offer greater choice whilst also ensuring that it can be delivered in a coordinated and sustainable way.
- A range of alternative Broad Location Options were put forward, including; focusing higher levels of growth in Newcastle's rural area outside the Green Belt; limiting growth in designated neighbourhood plan areas to that identified within their own housing need studies; having no growth in existing rural settlements and instead create a new settlement in the Green Belt close to the A500; focusing on locations which deliver major projects such as HS2, Constellation and Ceramic Valley EZ, and; maximising the potential of development outside the Green Belt before considering any Green Belt release – e.g. increasing densities and building heights.
- Those who supported options 1 and 2 did so largely on the grounds that it would be the most sustainable pattern of development – although recognising that it wouldn't deliver the growth required by the OAN.
- Comments in support of option 4 were largely on the grounds of resisting the release of Green Belt land and also limiting the loss of the Best and Most Versatile agricultural land.
- Those who were unsure largely did not express a preferred option and many recognised that all of the options had their benefits and disadvantages.

Additional Comments

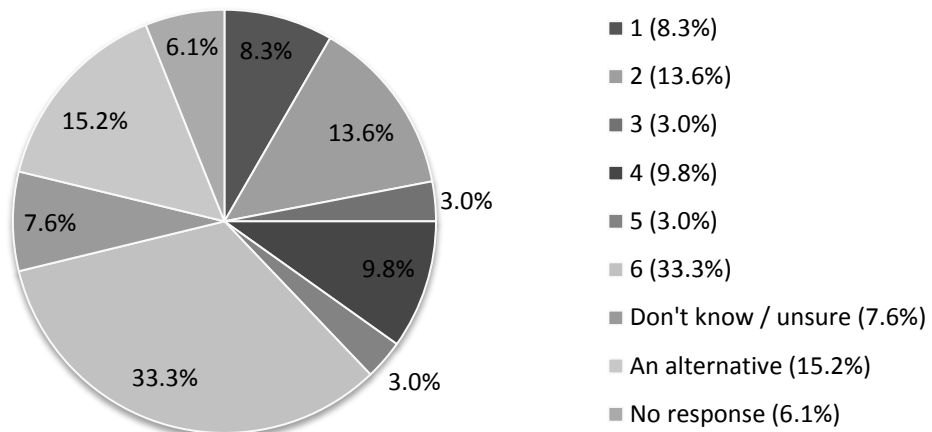
- There were concerns raised that some of the options would not deliver regeneration of centres or bring forward brownfield sites within the key areas with viability issues.
- Some comments offered a different view that resources should be concentrated where they achieve the best results and a mix of housing types and locations should be delivered.
- A large amount of comments were received asking to ensure that green spaces should be protected and maintained.
- There was a preference for clustered development rather than scattered, prioritising the most sustainable sites. Some respondents requested that the impact upon the Green Belt and a full review of the most appropriate sites is required.
- Opposing views over the number of dwellings to be delivered were received. Some were uncertain that the high numbers were needed or able to be delivered. However others stated that the areas potential should be maximised with higher growth and supporting the local economy.
- The extra pressure on all types of infrastructure should be considered and addressed as well as the impact on heritage and the development of culture in the area.

- The need to deliver further evidence and policy was discussed, specifically around water and minerals safeguarding. Concerns were also raised to ensure that the evidence is robust enough and delivered at the appropriate time. This has been accompanied by some concerns over the pace of the timetable.
- The public also comment that they are keen on public involvement in the plan preparation to ensure a positive plan.

Table 1 – Strategic Options Consultation Responses

<p>Question 1 – Is this an appropriate vision for Stoke-on-Trent and Newcastle-under-Lyme?</p>  <p>Total number of responses = 114</p>	<p>Question 2 – Will these aims and objectives help to deliver the vision for both Stoke-on-Trent and Newcastle-under-Lyme?</p>  <p>Total number of responses = 113</p>
<p>Question 3 – Which of the housing growth scenarios do you consider should be preferred?</p>  <p>Total number of responses = 128</p>	<p>Question 4 – Which of the employment growth scenarios do you prefer?</p>  <p>Total number of responses = 117</p>

Question 5 – Which of the Broad Location options do you prefer?



Total number of responses = 117

3 Schedule of Representations Received

Question 1: The Vision

The proposed vision for the plan area is:

"Together Stoke-on-Trent and Newcastle-under-Lyme will continue to promote themselves as great places to live and work with active communities at their heart. A great central innovative hub for investment. The area is supportive of new and innovative development whilst embracing and protecting the historic built heritage and natural environment within their urban areas."

Is this an appropriate vision for Stoke-on Trent and Newcastle-under-Lyme?

Yes;

No;

Don't know / unsure

Reference	Consultee	Consultee Response	Consultee Comments	Officers Comments
SO17/5/1729	Gary Picken	No	Change emphasis to state that the vision is for an improved environment for the people who live work and visit Stoke-on-Trent with suggested replacement sentence "The vision is to improve the urban and rural environment by upgrading and re-purposing areas of brownfield sites to provide a more balanced land use of both sustainable development whilst protecting the historic built heritage and enhancing the natural environment within Stoke on Trent.	It is agreed that the vision could include more emphasis on Stoke-on-Trent and Newcastle-under-Lyme wanting to attract more visitors to the area. However there is a danger of the vision becoming too long and detailed if it refers to land use/types of development, it is considered that detail can be set out within the objectives which do refer to the urban and rural environment, reusing brownfield land where appropriate and the historic built environment. Recommend to include reference to encouraging more visitors to Stoke-on-Trent and Newcastle-under-Lyme.
SO17/7/1730	B Isaac, G Downs and J Talbot	No	The vision for both Councils should be one of greater ambition. The Councils should not merely seek to 'promote' themselves but rather to instead reach beyond this and instead to strive to be an area of innovation that supports high quality	The councils agree that the vision requires refinement. The vision could be amended to capture the need to accommodate growth and increasing the amount of high quality employment and housing choice. The importance of our higher

Reference	Consultee	Consultee Response	Consultee Comments	Officers Comments
			employment and higher education & research whilst seeking to deliver a wide range of high quality housing to all sections of the community in order to deliver these aims.	education and research establishments is recognised and could also be reflected in the vision. Recommend to include reference to learning within the vision
SO17/9/1731	Mr G Adams	No	The vision for both Councils should be one of greater ambition. The Councils should not merely seek to 'promote' themselves but rather to instead reach beyond this and instead to strive to be an area of innovation that supports high quality employment and higher education & research whilst seeking to deliver a wide range of high quality housing to all sections of the community in order to deliver these aims.	The councils agree that the vision requires refinement. The vision could be amended to capture the need to accommodate growth and increasing the amount of high quality employment and housing choice. The importance of our higher education and research establishments is recognised and could also be reflected in the vision. Recommend to include reference to higher education/learning within the vision
SO17/6/1732	Ian Jefferies	No	The vision for both Councils should be one of greater ambition. The Councils should not merely seek to 'promote' themselves but rather to instead reach beyond this and instead to strive to be an area of innovation that supports high quality employment and higher education & research whilst seeking to deliver a wide range of high quality housing to all sections of the community in order to deliver these aims.	The councils agree that the vision requires refinement. The vision could be amended to capture the need to accommodate growth and increasing the amount of high quality employment and housing choice. The importance of our higher education and research establishments is recognised and could also be reflected in the vision. Recommend to include reference to higher education/learning within the vision
SO17/8/1733	J, R and M Hollins	No	The vision for both Councils should be one of greater ambition. The Councils should not merely seek to 'promote' themselves but rather to instead reach beyond this and instead to strive to be an area of innovation that supports high quality employment and higher education & research whilst seeking to deliver a wide range of high quality housing to all sections of the community in order to deliver these aims.	The councils agree that the vision requires refinement. The vision could be amended to capture the need to accommodate growth and increasing the amount of high quality employment and housing choice. The importance of our higher education and research establishments is recognised and could also be reflected in the vision. Recommend to include reference to higher education/learning within the vision
SO17/4/1734	Julie Everst Young	No	The vision for both Councils should be one of greater ambition. The Councils should not merely seek to 'promote' themselves but rather to instead	The councils agree that the vision requires refinement. The vision could be amended to capture the need to accommodate growth and

Reference	Consultee	Consultee Response	Consultee Comments	Officers Comments
			reach beyond this and instead to strive to be an area of innovation that supports high quality employment and higher education & research whilst seeking to deliver a wide range of high quality housing to all sections of the community in order to deliver these aims.	increasing the amount of high quality employment and housing choice. The importance of our higher education and research establishments is recognised and could also be reflected in the vision. Recommend to include reference to higher education/learning within the vision
SO17/11/1735	Mazar Hussain	No	The vision for both Councils should be one of greater ambition. The Councils should not merely seek to 'promote' themselves but rather to instead reach beyond this and instead to strive to be an area of innovation that supports high quality employment and higher education & research whilst seeking to deliver a wide range of high quality housing to all sections of the community in order to deliver these aims.	The councils agree that the vision requires refinement. The vision could be amended to capture the need to accommodate growth and increasing the amount of high quality employment and housing choice. The importance of our higher education and research establishments is recognised and could also be reflected in the vision. Recommend to include reference to higher education/learning within the vision
SO17/3/1736	P Marson, J Marson and A Manning	No	The vision for both Councils should be one of greater ambition. The Councils should not merely seek to 'promote' themselves but rather to instead reach beyond this and instead to strive to be an area of innovation that supports high quality employment and higher education & research whilst seeking to deliver a wide range of high quality housing to all sections of the community in order to deliver these aims.	The councils agree that the vision requires refinement. The vision could be amended to capture the need to accommodate growth and increasing the amount of high quality employment and housing choice. The importance of our higher education and research establishments is recognised and could also be reflected in the vision. Recommend to include reference to higher education/learning within the vision.
SO17/2/1737	Smartbuild & Design Limited	No	The vision for both Councils should be one of greater ambition. The Councils should not merely seek to 'promote' themselves but rather to instead reach beyond this and instead to strive to be an area of innovation that supports high quality employment and higher education & research whilst seeking to deliver a wide range of high quality housing to all sections of the community in order to deliver these aims.	The councils agree that the vision requires refinement. The vision could be amended to capture the need to accommodate growth and increasing the amount of high quality employment and housing choice. The importance of our higher education and research establishments is recognised and could also be reflected in the vision. Recommend to include reference to higher education/learning within the vision
SO17/10/1738	TFK Property Limited	No	The vision for both Councils should be one of	The councils agree that the vision requires

Reference	Consultee	Consultee Response	Consultee Comments	Officers Comments
			greater ambition. The Councils should not merely seek to 'promote' themselves but rather to instead reach beyond this and instead to strive to be an area of innovation that supports high quality employment and higher education & research whilst seeking to deliver a wide range of high quality housing to all sections of the community in order to deliver these aims.	refinement. The vision could be amended to capture the need to accommodate growth and increasing the amount of high quality employment and housing choice. The importance of our higher education and research establishments is recognised and could also be reflected in the vision. Recommend to include reference to higher education/learning within the vision
SO17/83/1739	Chris Flanagan	Not answered	Could comment more on 'people'	The councils wanted to ensure that the vision does recognise the people of Stoke-on-Trent and Newcastle-under-Lyme and therefore in this regard the vision does already include reference to 'communities' but this could be expanded to cover healthy and prosperous communities.
SO17/85/1741	David Bourne	Yes		Support noted
SO17/84/1742	Dennis Weston	Yes	All of North Staffordshire should be included i.e. Staffordshire Moorlands. Also, Staffordshire Moorlands is a main source of water supply (Tittesworth Reservoir) and an important recreational area for all the people of North Staffordshire and the surrounding areas.	The Joint Local Plan is being prepared by Stoke-on-Trent and Newcastle-under-Lyme for the two councils administrative areas. A separate plan is being prepared for Staffordshire Moorlands. However as set out within the Strategic Options Consultation Document the authorities have a duty to co-operate with neighbouring authorities to ensure any cross boundary issues are addressed including access to greenspace/leisure and recreation.
SO17/87/1744	Mrs M Hall	Yes	Newcastle and Stoke-On-Trent to remain separate authorities.	Support noted
SO17/88/1745	The Woodland Trust	No	Propose a small amendment to the vision in the last sentence: ".....whilst embracing, protecting and where possible enhancing the built heritage and natural environment within urban and rural areas." This makes it part of the vision to add new natural environment features, such as small areas of	Agreed to amend the last sentence of the vision to include reference to landscapes/natural environment.

Reference	Consultee	Consultee Response	Consultee Comments	Officers Comments
			woodland and new street trees, for example as part of new housing development.	
SO17/89/1746	Renew Land Developments LTD	No	The vision for both Councils should be one of greater ambition. The Councils should not merely seek to 'promote' themselves but rather to instead reach beyond this and instead to strive to be an area of innovation that supports high quality employment and higher education & research whilst seeking to deliver a wide range of high quality housing to all sections of the community in order to deliver these aims.	The councils agree that the vision requires refinement. The vision could be amended to capture the need to accommodate growth and increasing the amount of high quality employment and housing choice. The importance of our higher education and research establishments is recognised and could also be reflected in the vision. Recommend to include reference to higher education/learning within the vision
SO17/86/1747	Robert Almond	Yes	N/A	Support noted
SO17/101/1748	Newcastle-under-Lyme Borough Council (Regeneration)	Yes	This supports the thrust of the LEP's Strategic Economic Plan (SEP) and the Borough Council's emerging Economic Development Strategy.	Support noted
SO17/103/1749	Richard Atherton	No	The vision for both Councils should be one of greater ambition. The Councils should not merely seek to 'promote' themselves but rather to instead reach beyond this and instead to strive to be an area of innovation that supports high quality employment and higher education & research whilst seeking to deliver a wide range of high quality housing to all sections of the community in order to deliver these aims.	The councils agree that the vision requires refinement. The vision could be amended to capture the need to accommodate growth and increasing the amount of high quality employment and housing choice. The importance of our higher education and research establishments is recognised and could also be reflected in the vision.
SO17/125/1750	Andrew Alexander	No	The vision for both Councils should be one of greater ambition. The Councils should not merely seek to 'promote' themselves but rather to instead reach beyond this and instead to strive to be an area of innovation that supports high quality employment and higher education & research whilst seeking to deliver a wide range of high quality housing to all sections of the community in order to deliver these aims.	The councils agree that the vision requires refinement. The vision could be amended to capture the need to accommodate growth and increasing the amount of high quality employment and housing choice. The importance of our higher education and research establishments is recognised and could also be reflected in the vision.

Reference	Consultee	Consultee Response	Consultee Comments	Officers Comments
SO17/122/1752	Ascalon properties	No	Both Councils should seek to benchmark their economic growth objectives and housing provision within the wider regional picture and acknowledge that they face fierce competition for investment, housing and jobs from 'competing' authorities, both adjacent to their borders and across the wider Midlands and North West regional areas. The strategy needs to be more ambitious and actively pro-growth to stand a chance of diverting investment and jobs away from areas such as Manchester and Birmingham.	Comments noted. The councils agree that the vision requires refinement. The vision could be expanded to include reference to increasing the amount of high quality employment, retail and residential choice. The role of the Joint Local Plan will be to plan for a level of growth that will be deliverable. As set out within the Strategic Options Consultation document authorities have a duty to co-operate with neighbouring authorities to ensure any cross boundary issues are addressed. Recommend to make reference to the term 'growth' within the vision.
SO17/137/1753	Aspire Housing	Yes	The vision for both Councils should be one of greater ambition. The Councils should not merely seek to 'promote' themselves but rather to instead reach beyond this and instead to strive to be an area of innovation that supports high quality employment and higher education & research whilst seeking to deliver a wide range of high quality housing to all sections of the community in order to deliver these aims.	The councils agree that the vision requires refinement. The vision could be amended to capture the need to accommodate growth and increasing the amount of high quality employment and housing choice. The importance of our higher education and research establishments is recognised and could also be reflected in the vision.
SO17/141/1757	D2H	Not answered	It is considered that given the ambitious growth agenda related to investment in HS2 and more localised infrastructure, the vision could be more ambitious and aspirational, with a greater focus on finally realising North Staffordshire's untapped economic potential as the bridge between the Northern Powerhouse and Midlands Engine. It should also properly recognise the city region's growing reputation as a vibrant cultural destination, and the economic potential that this provides.	Comments noted. The councils are able to take into account the proposed route of HS2 and any associated infrastructure, along with safeguarded areas but at this stage the councils do not consider the economic growth potential arising from HS2 is sufficiently evidenced. It is agreed that the vision could be clearer in terms of reflecting the levels of growth that the councils are seeking to accommodate within the plan and the vision could be expanded to include cultural heritage. Recommend to make reference to the term 'growth' and 'culture' within the vision
SO17/121/1759	Dean Lewis Estates	Yes	We support a Vision that promotes sustainable development, full planned economic and housing	Support noted

Reference	Consultee	Consultee Response	Consultee Comments	Officers Comments
			growth and fully embracing the regenerative benefits of the Constellation Partnership's strategic plans.	
SO17/130/1760	Dr D Hodgkinson	No	The vision for both Councils should be one of greater ambition. The Councils should not merely seek to 'promote' themselves but rather to instead reach beyond this and instead to strive to be an area of innovation that supports high quality employment and higher education & research whilst seeking to deliver a wide range of high quality housing to all sections of the community in order to deliver these aims.	The councils agree that the vision requires refinement. The vision could be amended to capture the need to accommodate growth and increasing the amount of high quality employment and housing choice. The importance of our higher education and research establishments is recognised and could also be reflected in the vision.
SO17/128/1762	Elmside Garden Centre	No	The vision for both Councils should be one of greater ambition. The Councils should not merely seek to 'promote' themselves but rather to instead reach beyond this and instead to strive to be an area of innovation that supports high quality employment and higher education & research whilst seeking to deliver a wide range of high quality housing to all sections of the community in order to deliver these aims.	The councils agree that the vision requires refinement. The vision could be amended to capture the need to accommodate growth and increasing the amount of high quality employment and housing choice. The importance of our higher education and research establishments is recognised and could also be reflected in the vision.
SO17/118/1764	G Colclough-Evans	No	The vision for both Councils should be one of greater ambition. The Councils should not merely seek to 'promote' themselves but rather to instead reach beyond this and instead to strive to be an area of innovation that supports high quality employment and higher education & research whilst seeking to deliver a wide range of high quality housing to all sections of the community in order to deliver these aims.	The councils agree that the vision requires refinement. The vision could be amended to capture the need to accommodate growth and increasing the amount of high quality employment and housing choice. The importance of our higher education and research establishments is recognised and could also be reflected in the vision.
SO17/110/1765	Maer Hills Protection Group	No	We concur that innovative development needs to embrace and protect the historic built heritage and natural environment. Protection of the landscape and amenity value should also be included as a	Comments noted. It is agreed that the vision could be clearer and be expanded to include protection of the landscape. The vision is also supported by a number of aims and objectives which set out in

Reference	Consultee	Consultee Response	Consultee Comments	Officers Comments
			very important part of the proposed vision and strategic aims and should fundamentally underpin this vision.	more detail how the plan can meet the overall vision for the plan area. Recommend to include reference to the protection of landscapes in the vision
SO17/108/1766	Gary Dean Associates Ltd	No	The second and third sentences don't naturally flow from the first. Unlike the published draft Strategic Options document there is no explicit recognition of rural areas and little encouragement given to development that isn't new or innovative. Suggest that 'healthy' or 'vibrant' rather than 'active' communities would better indicate that the areas are great places to live and work. Greater emphasis should be placed on local people and communities, their quality of life and their ability to positively contribute to, and benefit from innovation and sustainable growth.	The councils want to ensure that the vision does recognise the people of Stoke-on-Trent and Newcastle-under-Lyme and therefore the vision does already include reference to communities. However, the vision could be expanded to include reference to healthy and prosperous communities; and increasing the amount of high quality employment, retail and residential choice. Recommend to reword the second and third sentences within the vision on employment and communities to include healthy and prosperous communities.
SO17/105/1767	Mark T Coupe	No	Vision is too vague and therefore, to provide clarity and meaning by which it can be measured, it should include reference along the lines of ...to continue to tackle problems associated with lack of inward investment, poor range of housing, areas of significant deprivation and change in rural areas by adopting a plan which can help reduce the effects of climate change, provide the flexibility which changes in technology will bring whilst also providing positive responses to changes brought by an ageing population. In delivering the vision also refer to the need of the support of potential investors and others with a stake in the area and that it should be adopted with vigour by the councils.	Comments noted, and the issues raised will influence the draft plan. It is considered important that the Joint Local Plan incorporates a positive vision which sets out what the plan area will look like if the plans strategy, aims, objectives and policies are followed. The plan will also incorporate a monitoring framework in order to assess and measure implementation of the plan. The councils acknowledge that it is early in the plan's preparation; therefore the full details of the Joint Local Plan policies have not been set out as yet, however consultation on the vision means we can seek support and comments from all stakeholders at this early stage.
SO17/102/1768	WW Planning	No	Vision is too vague and therefore, to provide clarity and meaning by which it can be measured, it should include reference along the lines of ...to continue to tackle problems associated with lack of	Comments noted, and the issues raised will influence the draft plan. It is considered important that the Joint Local Plan incorporates a positive vision which sets out what the plan area will look

Reference	Consultee	Consultee Response	Consultee Comments	Officers Comments
			inward investment, poor range of housing, areas of significant deprivation and change in rural areas by adopting a plan which can help reduce the effects of climate change, provide the flexibility which changes in technology will bring whilst also providing positive responses to changes brought by an ageing population. In delivering the vision also refer to the need of the support of potential investors and others with a stake in the area and that it should be adopted with vigour by the councils.	like if the plans strategy, aims, objectives and policies are followed. The plan will also incorporate a monitoring framework in order to assess and measure implementation of the plan. The councils acknowledge that it is early in the plan's preparation; therefore the full details of the Joint Local Plan policies have not been set out as yet, however consultation on the vision means we can seek support and comments from all stakeholders at this early stage.
SO17/131/1769	Graham Heath Group	No	The vision for both Councils should be one of greater ambition. The Councils should not merely seek to 'promote' themselves but rather to instead reach beyond this and instead to strive to be an area of innovation that supports high quality employment and higher education & research whilst seeking to deliver a wide range of high quality housing to all sections of the community in order to deliver these aims.	The councils agree that the vision requires refinement. The vision could be amended to capture the need to accommodate growth and increasing the amount of high quality employment and housing choice. The importance of our higher education and research establishments is recognised and could also be reflected in the vision.
SO17/120/1772	Historic England	Yes	We support the vision on page 9 and the inclusion of the historic environment in the future vision for the area. We would recommend that the text refers to 'built heritage' and deletes the term 'historic' and we would further recommend that the vision recognises historic landscapes as well.	Support noted. It is agreed that the vision should refer to built heritage rather than historic and consider including reference to landscapes. Recommend to refer to built heritage in the vision rather than historic and consider including reference to landscapes.
SO17/126/1773	Ian Dos Remedios	No	The vision for both Councils should be one of greater ambition. The Councils should not merely seek to 'promote' themselves but rather to instead reach beyond this and instead to strive to be an area of innovation that supports high quality employment and higher education & research whilst seeking to deliver a wide range of high	The councils agree that the vision requires refinement. The vision could be amended to capture the need to accommodate growth and increasing the amount of high quality employment and housing choice. The importance of our higher education and research establishments is recognised and could also be reflected in the

Reference	Consultee	Consultee Response	Consultee Comments	Officers Comments
			quality housing to all sections of the community in order to deliver these aims.	vision.
SO17/143/1774	Intu Properties plc	No	<p>The whole emphasis of the Joint Local Plan is on the growth of housing and employment in Stoke-on-Trent and Newcastle-under-Lyme and Intu supports its general approach. However, it is important that the Joint Local Plan recognises the role of retail and leisure in the economy and in generating employment. This role is not recognised in the plan. The proposed Vision for the Joint Local Plan, as set out on page 9 is generally supported. Whilst Intu supports the vision to promote Stoke-on-Trent and Newcastle-under-Lyme as great places to live and work this should be extended further to embrace those that visit as well. This can be achieved by a simple, but important, amendment to the vision. This would reflect the fact that a huge number of people visit the City Centre for reasons other than to work including many people from beyond the local area, based on its wide regional trade draw and importance economically.</p> <p>This would be consistent with advice in the NPPF which states that town and city centres should be recognised at the heart of their communities. Those who visit for shopping and leisure are vitally important to the maintaining the viability of vitality of the City Centre and thereby sustaining work opportunities for the local community. By widening the vision in this way the prospects of the plan achieving its central objective of promoting Stoke and Newcastle as great places to live and work are enhanced.</p>	<p>It is agreed that the vision, aims and objectives could recognise further the role of retail and leisure in the economy and in generating employment. Whilst the objectives do reflect seeking to attract more visitors it is perhaps not as explicit as it could be in the role that Stoke-on-Trent city centre will play in attracting further visitors and overnight stays. It is agreed that the vision should be more explicit in its reference to retail and to attracting more visitors to the area. Recommend that the Plan should be more explicit in its reference to attracting more visitors to the areas centres and to recognise, within the objectives, the role that retail and leisure uses have in supporting new employment opportunities and job growth.</p>
SO17/127/1775	J A Knight (Coppice) Ltd	No	The vision for both Councils should be one of greater ambition. The Councils should not merely	The councils agree that the vision requires refinement. The vision could be amended to

Reference	Consultee	Consultee Response	Consultee Comments	Officers Comments
			seek to 'promote' themselves but rather to instead reach beyond this and instead to strive to be an area of innovation that supports high quality employment and higher education & research whilst seeking to deliver a wide range of high quality housing to all sections of the community in order to deliver these aims.	capture the need to accommodate growth and increasing the amount of high quality employment and housing choice. The importance of our higher education and research establishments is recognised and could also be reflected in the vision.
SO17/109/1776	The Strategic Land Group	Yes	Yes, the vision promotes sustainable development and seeks to ensure the future economic growth of both local authorities.	Support noted
SO17/124/1777	John Sanders	No	The vision for both Councils should be one of greater ambition. The Councils should not merely seek to 'promote' themselves but rather to instead reach beyond this and instead to strive to be an area of innovation that supports high quality employment and higher education & research whilst seeking to deliver a wide range of high quality housing to all sections of the community in order to deliver these aims.	The councils agree that the vision requires refinement. The vision could be amended to capture the need to accommodate growth and increasing the amount of high quality employment and housing choice. The importance of our higher education and research establishments is recognised and could also be reflected in the vision.
SO17/134/1778	Keele Homes	No	The vision for both Councils should be one of greater ambition. The Councils should not merely seek to 'promote' themselves but rather to instead reach beyond this and instead to strive to be an area of innovation that supports high quality employment and higher education & research whilst seeking to deliver a wide range of high quality housing to all sections of the community in order to deliver these aims.	The councils agree that the vision requires refinement. The vision could be amended to capture the need to accommodate growth and increasing the amount of high quality employment and housing choice. The importance of our higher education and research establishments is recognised and could also be reflected in the vision.
SO17/135/1779	Keele University	No	Newcastle Under Lyme as great places to live and work, it fails to recognise their importance and attractiveness as places to learn. There are two Universities within the area which play important roles in raising its profile and attractiveness, and contribute significantly, both now and in the future,	Comments noted. The vision could be amended to recognise the important role of the area as a place for learning. The areas two universities (and other colleges and further education) play important roles in raising the areas profile and attractiveness, and contribute significantly to the

Reference	Consultee	Consultee Response	Consultee Comments	Officers Comments
			to the local economy. The Vision statement should be amended to reference 'learning' alongside 'living and working' as attributes of the area.	present and future local economies. The vision should be amended to include 'learning' alongside 'living and working' as a key element of the future aspiration for the area. Recommend to include reference to higher education/learning within the vision.
SO17/129/1780	Keith Eardley	No	The vision for both Councils should be one of greater ambition. The Councils should not merely seek to 'promote' themselves but rather to instead reach beyond this and instead to strive to be an area of innovation that supports high quality employment and higher education & research whilst seeking to deliver a wide range of high quality housing to all sections of the community in order to deliver these aims.	The councils agree that the vision requires refinement. The vision could be amended to capture the need to accommodate growth and increasing the amount of high quality employment and housing choice. The importance of our higher education and research establishments is recognised and could also be reflected in the vision.
SO17/117/1781	Mr Jones	No	The Vision as set out upon Page 9, entitled "Vision 2033", of the Consultation Document differs from that set out within the Feedback Form, in that; the final sentence of the Vision within the Document states; "The area is supportive of new and innovative development whilst embracing and protecting the historic built heritage and natural environment within their urban and rural areas." The rural area does form a significant part of, particularly, the Borough of Newcastle under Lyme, and does therefore have an important role to play in its future development, growth, prosperity and well-being, and it is therefore essential that it does form a key part of the Vision, as scribed. Suggest that the final sentence is revised to read "This overall Plan area, across both its urban and rural parts, is jointly supportive of new and, innovative development, whilst embracing and protecting the historic built heritage and natural environment within it".	The vision as proposed within the Strategic Options Consultation document is the vision promoted across the Plan area and includes the rural area. Reference to communities would include rural and urban communities. The councils apologise if that was not clear. It is agreed that the vision could be amended to explicitly refer to rural area. Recommend a more integrated explanation within the vision of the importance of the rural area.

Reference	Consultee	Consultee Response	Consultee Comments	Officers Comments
SO17/107/1782	St Modwen Developments Ltd	No	<p>It is considered that this is not an appropriate vision for Stoke-on-Trent and Newcastle-under-Lyme. The commentary which follows this provides context by way of a review of background material which will influence the preparation of the Joint Local Plan. This includes themes around maximising wealth and productivity whilst promoting economic growth; planning for growth; boosting economic growth; establishing an economic powerhouse ; creating tens of thousands of jobs; increasing wealth, productivity and employment identifying locations for economic growth; and so on. The Strategic Options Consultation Document goes on to state that, “The overriding objective of the Joint Local Plan is to ensure that all relevant strategies are reflected in the new plan for decision making” (emphasis added). As such, having driven home forcefully and at length the growth agenda established through a range of policy and strategy documents (indeed this could scarcely have been given any greater emphasis by the document), it is then confirmed that these will be reflected in the new plan. However, the Vision then shies away from this, and does not include the word “growth”. Whilst reference is made to “investment” and “development”, which is welcomed, the Vision neglects to mention something that is at the heart of the material informing the JLP, and is indeed reflected in the scenarios and options which are then considered in the remainder of the document. In whichever way those scenarios and options are ultimately resolved it is clear that this is, appropriately, intended to be a plan for growth, and that needs to be recognised from the outset in the Vision. This would be achieved by adding the</p>	<p>Comments noted. It is agreed that the vision could be clearer in terms of referring to the growth that the councils are seeking to plan for within the Joint Local Plan. Recommend that the plan makes reference to the term 'growth' within the vision.</p>

Reference	Consultee	Consultee Response	Consultee Comments	Officers Comments
			words, “and growth” after “investment” in the Vision as currently worded. The Vision, Aims and Objectives will not be fully successful or representative of the direction the Plan needs to take unless growth is placed at the centre of them. This is generally achieved through the Aims and Objectives, but not the Vision. This should be addressed by making reference to growth in the Vision.	
SO17/111/1784	Dean Estates	Yes	Yes, the vision promotes sustainable development and seeks to ensure the future economic growth of both local authorities.	Support noted
SO17/136/1786	Mr and Mrs Rawlins	No	The vision for both Councils should be one of greater ambition. The Councils should not merely seek to ‘promote’ themselves but rather to instead reach beyond this and instead to strive to be an area of innovation that supports high quality employment and higher education & research whilst seeking to deliver a wide range of high quality housing to all sections of the community in order to deliver these aims.	The councils agree that the vision requires refinement. The vision could be amended to capture the need to accommodate growth and increasing the amount of high quality employment and housing choice. The importance of our higher education and research establishments is recognised and could also be reflected in the vision.
SO17/139/1787	Mr C and Mrs S Taylor	No	The vision for both Councils should be one of greater ambition. The Councils should not merely seek to ‘promote’ themselves but rather to instead reach beyond this and instead to strive to be an area of innovation that supports high quality employment and higher education & research whilst seeking to deliver a wide range of high quality housing to all sections of the community in order to deliver these aims.	The councils agree that the vision requires refinement. The vision could be amended to capture the need to accommodate growth and increasing the amount of high quality employment and housing choice. The importance of our higher education and research establishments is recognised and could also be reflected in the vision.
SO17/140/1788	Mr and Mrs E Woodall	Not answered	Whilst the proposed vision conveys a clear message that the Councils will promote the economy and attract investment, we are disappointed that the proposed vision no longer	It is agreed that the vision could be clearer in terms of reflecting that the councils are seeking to ensure economic growth and to recognise that this needs to bring prosperity to the people who live

Reference	Consultee	Consultee Response	Consultee Comments	Officers Comments
			<p>sets a target of improving prosperity across the communities of the joint plan area. This is a laudable component of the adopted vision, and we believe should remain at the heart of any new plan for the area. Economic prosperity is intrinsically linked with the achievement of other social and environmental sustainability objectives, so provides a clear and measurable target for the plan period. We are pleased to see within the Vision a commitment to supporting new investment and we hope the vision recognises the significant contribution that new housing can make towards this objective. For example, estimates of household spend produced by the Office of National Statistics¹ show that in the West Midlands, the average household annual spend is £23,600, and £24,600 per household in the North West. This demonstrates that housing growth can bring significant spending and investment into an area, in addition to the significant economic benefits that occur during the construction stage. Consequently, higher housing growth can undoubtedly complement other initiatives to attract employment opportunities and stimulate economic growth. Other observations that we wish to make regarding the vision is the lack of reference to promoting the areas rich cultural heritage, which should be mentioned alongside the objective of protecting the areas historic built heritage. Finally, we also note that the vision is silent on the issue of climate change. We believe that the vision should acknowledge, and show a commitment towards mitigating and adapting to the adverse effects associated with climate change.</p>	<p>and work within the area. Comments are noted and agreed with regard to including and referencing culture within the vision. On the issue of climate change this is referenced within Aim 4 - to balance and minimise the adverse impacts of climate change through the promotion of renewable energy sources. The vision should be amended to include references to economic growth, culture and climate change. Recommend to include reference to 'growth' and 'culture' within the vision and consider reference to climate change in addition to Aim 4.</p>
SO17/104/1792	HCA	Yes		Support noted

Reference	Consultee	Consultee Response	Consultee Comments	Officers Comments
SO17/119/1793	Peter Brett Associates	Yes	We generally support the Vision for Newcastle-under-Lyme and Stoke-on-Trent that is set out on page 13 of the Strategic Options Consultation Document. Critical to the achievement of the Councils' economic ambitions will be ensuring that the right amount and type of housing is delivered in the right locations.	Support noted
SO17/112/1795	Lands Improvements Holdings	Yes	LIH agrees that this proposed vision is appropriate for the plan area.	Support noted
SO17/116/1796	Richborough Estates	No	The proposed vision of the plan should comprise the overarching ambition of the two authorities as to where they see the area at the end of the plan period. It is considered that the vision should be positively phrased as follows: "Together, Stoke-on-Trent and Newcastle-under-Lyme will emerge as an innovative core city with active communities at its heart, supported by high quality employment, high quality higher education and research, and a wide range of quality housing for all sections of the community. The area will facilitate and embrace change, whilst protecting and enhancing the historic built heritage and natural environment within the urban and rural areas". Whilst any vision will not be a specific development plan policy, the aims and objectives, and subsequent policies will follow on to meet the vision. It is therefore important to ensure that the two authorities get the vision right.	Comments noted. It is important to ensure that the vision sets out and shapes the development strategy that is taken forward as part of the Joint Local Plan. The councils evidence and strategic options consultation document supports attracting high quality employment to the area and supports the universities; colleges and higher education establishments within the Plan area to help to improve job opportunities. It is agreed that more emphasis can be included to ensure the vision is clearer in terms of its ambition and to include reference to learning. Recommend to include reference to higher education/learning within the vision
SO17/133/1799	SOT Regeneration Ltd and Mr Poole	No	The proposed vision of the plan should be a positive overarching ambition of the two authorities as to where they see the area at the end of the plan period. Simply stating that Stoke-on-Trent will "promote" itself as a great place to live and work does not do much to drive confidence on delivery. It is considered that the vision should be positively	Comments Noted. It is important to ensure that the vision sets out and shapes the development strategy that is taken forward as part of the Joint Local Plan. The councils evidence and strategic options consultation document supports attracting high quality employment to the area and supports the universities; colleges and higher education

Reference	Consultee	Consultee Response	Consultee Comments	Officers Comments
			phrased, recognising the role that housing has to play to attract and retain the workforce to meet the council's economic growth ambitions. In addition, focus must be given, not only to the allocation of suitable employment sites, but also the types of employment that the City wishes to offer, taking into account the jobs of the future and working with the two Universities of Keele and Staffordshire to retain graduates in the area after they have completed their studies. Whilst any vision will not be a specific development plan policy, the aims and objectives, and subsequent policies will follow on to meet the vision. It is therefore important to ensure that the two authorities get the vision right.	establishments within the Plan area to help to improve job opportunities. It is agreed that more emphasis can be included to ensure the vision is clearer in terms of its ambition and to include reference to learning. Recommend to include reference to education/learning within the vision
SO17/142/1800	St Modwen Developments Ltd, Stoke-on-Trent Regeneration Ltd and St Modwen Securities Ltd	No	The Vision is particularly disappointing in simply seeking to "promote" the towns. The Core Spatial Strategy's description of what the Councils would like to achieve or accomplish in the future is far more aspirational. The Core Strategy aspires to achieve objectives whereas the Local Plan seeks only to promote the areas. The Vision should be what the area will be. In particular the Vision needs to address the aspiration to enable the provision of the range and choice of housing needed to attract and retain locally the workforce needed to meet the economic targets and to enable those targets to be met through the identification of suitable employment sites. The Vision needs to encompass the ambition for growth in the economy supported by an increase in workforce.	Comments noted. It is considered important that the Joint Local Plan incorporates a vision which sets out what the plan area will look like if the plans strategy, aims, objectives and policies are followed, however it is recognised that the vision could be clearer in terms of reflecting the levels of growth and increase the prosperity of the area and be clearer in the ambition to ensure greater residential choice. Recommend to make reference to the term 'growth' and increasing 'residential choice' within the vision.
SO17/132/1801	Staffordshire County Council	Not answered	The proposed vision partially reflects NPPF guidance related to planning and the natural environment to some degree by referring to protection of the natural environment, though additional reference to enhancement would more	Comments noted. It is considered appropriate to ensure better compatibility with the NPPF and include reference to enhancing the natural environment under Aim 4, rather than explicitly within the vision, to ensure it is clear in the context

Reference	Consultee	Consultee Response	Consultee Comments	Officers Comments
			<p>appropriately reflect NPPF guidance in s.109 and s.114 both of which refer to protection and enhancement. This would also bring the vision into line with Aims 2 & 4. We believe that the proposed overarching vision for the Joint Local Plan will allow for the development of the area to be framed in an appropriate and effective way. It is particularly encouraging to see reference to the area being an 'innovative' hub for investment, which would help to create a more prosperous and productive local economy and support our own Strategic Plan priority for our residents, "to be able to access more good jobs and feel the benefits of economic growth."</p> <p>Achieving this aim will require a joined up approach towards attracting new investment and making best use of the knowledge and innovation assets that we already have and provide the potential for further growth. In particular, we believe that the Joint Plan will need to take advantage of the unique opportunities offered by Keele University and its associated Science and Innovation Park, whilst also continuing to support the development of Staffordshire University for the benefit of the whole county. The 'New Keele Deal' sets out in some detail how local partners will work together to 'invest in innovation led growth' which will lead to 700 new jobs, £70 million of investment, and will inject £0.21 billion into the local economy and this is something we wholeheartedly support.</p> <p>However, the Stoke-on-Trent and Staffordshire Local Enterprise Partnership Strategic Economic Plan (SEP) is referenced throughout the Strategic</p>	<p>of the objective to protect, improve and enhance the countryside and the diversity of wildlife and habitats across the plan area. It is important to ensure that the vision positively sets out and shapes the development strategy that is taken forward as part of the Joint Local Plan. The areas universities and colleges play an important role in future economic prosperity of the area. The councils evidence and strategic options consultation document supports attracting the high quality employment and supports the universities; colleges and higher education establishments within the Plan area to help to improve job opportunities. The vision should be amended to include references to growth, enhancing the environment, learning and creating healthy and prosperous communities. It is agreed that the Stoke-on-Trent and Staffordshire Strategic Economic Plan is a relevant local strategy that the Joint Local Plan needs to recognise. Recommend to include reference to enhancing the natural environment within Aim 4.</p>

Reference	Consultee	Consultee Response	Consultee Comments	Officers Comments
			Options document but is not listed as a relevant local strategy in section two. This seems to be an obvious omission and given that the emerging SEP is being developed and influenced by a wide range of local partners, including Stoke-on-Trent City Council and Newcastle-under-Lyme Borough Council, we would expect this document to be considered in the development of the Local Plan.	
SO17/123/1802	Stephen Beaumont	No	The vision for both Councils should be one of greater ambition. The Councils should not merely seek to 'promote' themselves but rather to instead reach beyond this and instead to strive to be an area of innovation that supports high quality employment and higher education & research whilst seeking to deliver a wide range of high quality housing to all sections of the community in order to deliver these aims.	The councils agree that the vision requires refinement. The vision could be amended to capture the need to accommodate growth and increasing the amount of high quality employment and housing choice. The importance of our higher education and research establishments is recognised and could also be reflected in the vision.
SO17/106/1805	Lichfields	No	The whole emphasis of the Joint Local Plan is on the growth of housing and employment in Stoke-on-Trent and Newcastle-under-Lyme and Intu supports its general approach. However, it is important that the Joint Local Plan recognises the role of retail and leisure in the economy and in generating employment. This role is not recognised in the plan. The proposed Vision for the Joint Local Plan, as set out on page 9 is generally supported. Whilst Intu supports the vision to promote Stoke-on-Trent and Newcastle-under-Lyme as great places to live and work this should be extended further to embrace those that visit as well. This can be achieved by a simple, but important, amendment to the vision. This would reflect the fact that a huge number of people visit the City Centre for reasons other than to work including many people from beyond the local area,	Comments noted. At this stage the Joint Local Plan has focussed on employment and housing growth, along with strategic options for where this growth could be accommodated. Evidence recognises the role of the retail and leisure industry to economic prosperity and the employment that those sectors provide. This will be demonstrated further as the Joint Local Plan progresses. It is agreed that the vision, aims and objectives could recognise further the role of retail and leisure in the economy and in generating employment. Whilst the objectives do reflect seeking to attract more visitors it is not as explicit in describing the role that Stoke-on-Trent city centre will play in attracting further visitors and overnight stays. It is agreed that the Plan could be more explicit in its reference to attracting more visitors to the area and to recognise the role that

Reference	Consultee	Consultee Response	Consultee Comments	Officers Comments
			based on its wide regional trade draw and importance economically. This would be consistent with advice in the NPPF which states that town and city centres should be recognised at the heart of their communities. Those who visit for shopping and leisure are vitally important to the maintaining the viability of vitality of the City Centre and thereby sustaining work opportunities for the local community. By widening the vision in this way the prospects of the plan achieving its central objective of promoting Stoke and Newcastle as great places to live and work are enhanced.	retail and leisure uses have in supporting new employment opportunities and job growth. Recommend that the Plan should be more explicit in its reference to attracting more visitors to the areas centres and to recognise the role that retail and leisure uses have in supporting the area as a whole as a great place to live, learn, work and visit and in supporting new employment opportunities and job growth.
SO17/138/1808	Urban Vision North Staffordshire	Not answered	It is considered that given the ambitious growth agenda related to investment in HS2 and more localised infrastructure, the vision could be more ambitious and aspirational, with a greater focus on finally realising North Staffordshire's untapped economic potential as the bridge between the Northern Powerhouse and Midlands Engine. It should also properly recognise the city region's growing reputation as a vibrant cultural destination, and the economic potential that this provides, particularly in the context of the city's bid to become the UK City of Culture in 2021.	Comments noted. The councils are able to take into account the proposed route of HS2 and any associated infrastructure, along with safeguarded areas but at this stage the councils do not consider the economic growth potential arising from HS2 is sufficiently evidenced. It is agreed that the vision could be clearer in terms of reflecting the levels of growth that the councils are seeking to accommodate within the plan and the vision could be expanded to include cultural heritage. Recommend to make reference to the term 'growth' and 'culture' within the vision
SO17/373/1809	Gladman Developments	Not answered	Gladman generally supports the aims and objectives outlined in the consultation document; however it considers that greater emphasis could be given to the need for substantial housing growth in the plan area to meet needs up to 2033. Gladman agrees that regeneration and redevelopment of brownfield sites should be an important part of the development strategy for the plan area; however it is important that the type and amount of development in regeneration areas is realistic.	Support is noted. The Council will continue to ensure that the housing delivery is based upon robust evidence and that the most appropriate sites to meet these levels of growth are allocated.

Reference	Consultee	Consultee Response	Consultee Comments	Officers Comments
SO17/370/1812	Graham and Sylvia Rowe	Yes		Support noted
SO17/368/1814	Mrs M.A. Wareham	Yes	Support for the vision - Newcastle and Stoke-on-Trent to remain separate authorities.	Support noted
SO17/365/1815	Carl Edwards	No	The vision for both Councils should be one of greater ambition. The Councils should not merely seek to 'promote' themselves but rather to instead reach beyond this and instead to strive to be an area of innovation that supports high quality employment and higher education & research whilst seeking to deliver a wide range of high quality housing to all sections of the community in order to deliver these aims.	The councils agree that the vision requires refinement. The vision could be amended to capture the need to accommodate growth and increasing the amount of high quality employment and housing choice. The importance of our higher education and research establishments is recognised and could also be reflected in the vision.
SO17/371/1816	Mrs S Y Cornes	No	The above statement that Stoke-on-Trent, discounting Newcastle-under-Lyme, that Stoke is a great place to live and work is most definitely not true. It has been voted one of the worst areas to move to, and I totally agree. The work needs to start in the inner city areas and work outwards, not build all this housing on the fringes in the green belt. Totally unacceptable. The people need affordable housing near their work, not having to travel.	Comments noted, however the councils consider the vision could be clearer and set out what the area will be like - a statement - if the aims, objectives, strategy and policies of the plan are followed. Therefore the Joint Local Plan has a series of aims and objectives which set out how the councils will meet the overall vision. The Joint Local Plan wants to stimulate change and create sustainable communities with affordable housing close to where people work. The councils acknowledge that it is early in the plan's preparation; therefore the full details of the Joint Local Plan policies have yet to be developed.
SO17/372/1817	Pat Lee	Yes		Support noted
SO17/366/1819	Muller Property Group	Yes	We are of the view that the Vision for Stoke-on-Trent and Newcastle-under-Lyme is appropriate. It must, however, be ensured that the emerging Plans policies are capable of delivering the Vision. In order to be a "great place to live and work" the emerging Plan must ensure that a sufficient	Support and comments noted

Reference	Consultee	Consultee Response	Consultee Comments	Officers Comments
			quantum of housing employment land is allocated to meet growth requirements. In addition, its housing employment land allocations must provide a balanced portfolio of the sites is available to ensure delivery provide a range of different development opportunities in a variety of locations to reflect the requirements of market. In terms of housing specifically, clearly it is appropriate for residential developments to be directed towards the principal settlements on previously developed sites. However, it is clear that the local authorities wish to diversify their economic base and for the areas to become a centre for innovation of investment. In doing so it must be an attractive place to live. As a consequence, the Plan will need to identify a range of different housing sites both within the urban area and on its periphery in sustainable locations. For example, there is market demand for executive and high quality housing in more rural sustainable areas in close proximity to the larger towns and villages.	
SO17/367/1821	Sam Loweth	Yes		Support noted
SO17/369/1823	Whitmore Parish Council	Yes	This is fine as a vision but of course a "vision" is only an "aspiration" and does not involve any "firm commitment to a particular achievement that the Borough Council (BC) can be held to account for." However, its wording could be interpreted as indicating that S-o-T and N-u-L is a homogeneous entity, and should be adjusted to make clear that S-o-T and N-u-L are (and will remain) two separate and distinct communities working together to develop strategies and to exploit synergies whilst protecting and promoting the individual and unique characteristics of each.	Support and comments noted

Reference	Consultee	Consultee Response	Consultee Comments	Officers Comments
SO17/455/1824	Neale Sheldon	Yes	The vision is appropriate. Personally I would try and keep Newcastle separate from Hanley. Newcastle to survive needs to be in competition with Hanley.	Support and comments noted.
SO17/456/1825	Stephanie Evans	Don't know / unsure		Noted
SO17/457/1826	Steven Malam	No		Noted
SO17/458/1827	Theatres Trust	Don't know / unsure		Noted
SO17/459/1828	Jill Freeman	Yes		Support noted
SO17/460/1829	Michael Hall	Yes		Support noted
SO17/461/1830	The Connecting Tracks Project	Yes		Support noted
SO17/462/1831	Andrew Wickens	Don't know / unsure	I would encourage rewriting the vision if only because the second sentence is not grammatical and though that may be pedantic it's vital that the area communicates in a way that attracts businesses and visitors as well as residents. I wonder if the second sentence is meant to be a possible strapline for the area?	Comments noted. The grammar and wording of sentence two can be reviewed
SO17/463/1832	Richard Nicholl	Yes		Support noted
SO17/464/1833	Donald Butterworth	Yes		Support noted
SO17/465/1834	Paul Baddeley	Yes	I would like mention of connections and transportation (walking, cycling, bus and train) place where there many options to get about without relying on the car. There are not at present but we should aim to improve. How we get about	Support and comments noted

Reference	Consultee	Consultee Response	Consultee Comments	Officers Comments
			and reducing congestion is key to attract investment and walking and cycling tick the health agenda.	
SO17/466/1835	Loggerheads Parish Council	Yes	I am pleased to see that you have added the "rural areas" into this vision, not in the original version that was put out for consultation.	Support noted
SO17/467/1836	Adri Hartveld	Yes		Support noted
SO17/468/1837	Karl Deakes	Yes		Support noted
SO17/469/1838	Catherine Salt	Yes		Support noted
SO17/470/1839	Mr and Mrs Phillips	Not answered	We agree with general vision but would want to ensure that the part regarding embracing and protecting heritage and environment is adhered to as some of the options include active agricultural land and green belt despite there being large areas of brownfield site available.	Comments noted
SO17/471/1840	Carlton Woolley	Yes	Vision is appropriate, but how does building on Green belt protect the natural environment?	Support and comments noted
SO17/472/1841	Natural England	No	Note that the Vision is very brief but acknowledge that it does include the aspiration to protect the natural environment within both rural and urban areas. We would prefer to see an expanded vision which addresses the impacts 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.	Comments noted. It is considered important that the Joint Local Plan incorporates a vision which sets out what the plan area will look like if the plans strategy, aims, objectives and policies are followed. The vision is intended to be high-level and include the Plan area as a whole. We acknowledge that it does not explicitly mention enhancement of the natural environment or designated environmental assets. The vision could be clearer and be amended to include enhancement, as well as protection, of the natural environment. However, in respect of designated environmental assets, the vision broadly covers

Reference	Consultee	Consultee Response	Consultee Comments	Officers Comments
				the natural environment. It is considered that it would be appropriate to provide further detail in relation to enhancing the natural environment under Aim 4 'Utilising our Natural Assets and Resources' to ensure it is clear in the context of the objective to protect, improve and enhance the countryside and the diversity of wildlife and habitats across the plan area. Recommend to include reference to enhancing the environment within the vision and Aim 4.
SO17/473/1842	Jacqueline Karen Reynolds	Don't know / unsure	I can understand the need for a vision but in regard to embracing and protecting heritage and the environment I don't understand how you can include agricultural and green belt. There are enough brown field sites available throughout Stoke on Trent and Newcastle and waste land within the towns which have the infrastructure already there. Rural areas if developed inappropriately lose the natural environment and are not a great central innovative hub for investment. Generally there is not enough infrastructure which can support a larger community i.e. schools, doctors, public transport and roads which can take large volumes of traffic than they already have going through their community.	Comments noted. It is important to ensure that the vision sets out and shapes the development strategy that is taken forwards as part of the Joint Local Plan. The council's need to ensure that they are meeting the needs of the area in the best way possible whilst also adhering to the strategy and vision. The Joint Local Plan needs to ensure that the sites put forward are viable and can be delivered within the plan period, whilst also ensuring that any necessary infrastructure is taken into account and planned for and that sites with the most ecological value are retained and protected.
SO17/474/1843	Lynne Woolley	Don't know / unsure	My understanding is that Stoke-on-Trent does not have a good reputation as a good place to live, routinely, coming last/next last in lists of the best places in the UK to live. If Stoke-on-Trent needs to move forward then it needs to spend money in addressing the inner city areas of deprivation and neglect.	Comments noted. However it should be recognised that the reputation of Stoke-on-Trent does not always follow the positivity of the place in reality. Stoke-on-Trent was recognised on the Telegraphs 25 Best Towns and Cities to work list in 2017. Scoring an overall score of 3.9 out of 5 and a job satisfaction rating of 3.3 out of 5.

Reference	Consultee	Consultee Response	Consultee Comments	Officers Comments
SO17/475/1844	John Lamont	Yes		Support noted
SO17/476/1845	Janet Lamont	Yes	More emphasis should be on protecting the environment and therefore it should come before "innovative hub for investment" in vision statement.	Support and comments noted
SO17/477/1846	Sport England	No	<p>Introduction: 1.9 needs to be updated. Both NBC and SOT now have up to date adopted Playing Pitch Strategies which need to be both referenced here and implemented through the next stage of policy preparation. In terms of built sports facilities both Councils have undertaken some assessment work but Newcastle's assessment work has been focussed on the impact of the imminent closure of Kidsgrove Leisure Centre and Stoke's assessment work, whilst comprehensive, has faltered with structural and political change. To ensure the Local Plan is fully informed by evidence base this Built Facility Strategy work needs to be completed in order for the Plan to be properly evidence based in terms of NPPF Paragraph 73 and provide informed decisions through NPPF Paragraph 74 in order to ensure the provision of infrastructure (built and outdoor) meet the needs of the community and provide more opportunity for physical activity to support delivery of the improved health and well-being agenda and vision.</p> <p>The Vision: Makes no reference to delivering 'healthy' communities. Whilst it references 'active communities', which is welcomed, it is not really clear if this includes physical activity (communities could be active doing many things but this may not include physical activity) which is critical given the</p>	Comments noted. We recognise that it is early in the plan making process and that the infrastructure needs of the area and evidence such as that contained within the adopted Playing Pitch Strategies will inform the plan as it progresses. It is considered important that the Joint Local Plan incorporates a vision which sets out what the plan area will look like if the plans strategy, aims, objectives and policies are followed. The vision could be expanded to include reference to delivering active 'healthy' communities.

Reference	Consultee	Consultee Response	Consultee Comments	Officers Comments
			linkage to delivering healthy communities.	
SO17/478/1847	M Davies	Yes		Support noted
SO17/479/1848	Staffordshire Chambers of Commerce	Yes	To grow our economy, generate jobs and improve living standards for all, it is vital that we are able to offer a wide mix of quality housing stock and suitable employment land to meet the needs and aspirations of all current and future residents. Staffordshire Chambers of Commerce support Stoke-on-Trent City Council's and Newcastle Borough Council's ambitious plans for the economic growth of the city and wider North Staffordshire conurbation. While we support the ambitions of the Joint Local Plan, the Chamber, as a business voice for Staffordshire, have identified many concerns that businesses have and which the Joint Local Plan will need to address before its implementation.	Support and comments noted
SO17/480/1849	Keele Parish Council and Neighbourhood Plan	Don't know / unsure	The vision is very broad and lacks specificity regarding the nature of new and innovative development. We would like to have seen references to building on the areas historic tradition of industrial innovation, its strong base in craft skills and the opportunities presented in developing cutting edge industry by its Universities. Equally, there is a lack of vision with regard to how employment might be developed in rural areas. There is a danger of development defaulting to more distribution centres and low value employment therein.	Comments noted. It is considered important that the Joint Local Plan incorporates a vision which sets out what the plan area will look like if the plans strategy, aims, objectives and policies are followed. We recognise that it is early in the plan making process and further detail will be set out as the plan progresses. It is agreed that the vision does not explicitly refer to higher education/learning and the vision could be expanded to include this. The role that rural areas play in contributing to employment is included in one of the objectives supporting Aim 1 which states 'to diversify the employment base of all parts of the plan area both urban and rural'. Recommend to include reference to higher education/learning within the vision.

Reference	Consultee	Consultee Response	Consultee Comments	Officers Comments
SO17/481/1850	Peter Jones	No		Noted
SO17/482/1851	Angela Clarke	No	Nobody gives a damn about Kidsgrove that's why all the services are being taken away.	Comments noted
SO17/483/1852	Canal & River Trust	Don't know / unsure	The canal network forms an important part of the industrial heritage of the area, and we therefore agree that in supporting new and innovative development, the Vision should acknowledge the importance of protecting the historic built heritage of the area. The canal network is a multi-functional resource which can act in a range of roles. Inland waterways can help to stimulate regional, sub-regional and local economies and can be used successfully as tools in improving community wellbeing and urban and rural housing offers; in attracting and generating investment; in place-making and place-shaping; and in delivering wider public benefit. The canals in the area provide an attraction that also contributes to the local tourist and visitor economy. Canal towpaths offer a sustainable, traffic-free route for walkers and cyclists, both for commuting and for leisure and recreation and thus contribute towards reducing reliance on private motor cars to access services and facilities and also encouraging healthier lifestyles and improving the overall health and wellbeing of local communities. The Trust therefore believes that the canal network can play a valuable role in helping to achieve the Vision for the plan area.	The importance of the canal network within the plan area is recognised in one of the objectives supporting Aim 4 which is 'to protect, utilise and improve the plan area's network of canals and watercourses'.
SO17/484/1853	Packmoor Residents Association	Yes	Post Brexit, emphasis should now be on a more corporate approach to the way that the joint councils work. We are definitely open for business and are in a strong strategic position to compete with the bigger players e.g. Manchester,	Support and comments noted

Reference	Consultee	Consultee Response	Consultee Comments	Officers Comments
			Birmingham and so on. As a result emphasis for a new development plan (Joint Local Plan) should be on co-operation, improving infrastructure and enabling businesses to access appropriate sites at a reasonable cost to compete with the major centre and attract new business and enterprises. The rest, housing etc. would fall into place.	
SO17/485/1854	Wenslie Naylor	Yes	The 'vision' statements whilst identifying specific economic sectors some of which I cannot see represented in the Plan area (aero and auto) have missed reference to job creating 3rd sector fields: cultural activities sports participation and provision.	Support and comments noted
SO17/486/1855	Stephen Peake	No		Noted
SO17/487/1856	Sue Sandywell	No		Noted
SO17/488/1857	Jennifer Cook	Don't know / unsure		Noted
SO17/489/1858	Kidsgrove Independents	No		Noted
SO17/490/1859	Audley Rural Parish Council	Yes		Support noted
SO17/491/1860	Alderman David Becket	Don't know / unsure	A vision statement is just a collection of words, useless in the absence of a strategy and resource to achieve. This vision is reasonable as far as it goes, but there is no mention of our cultural and industrial heritage.	Comments noted. It is agreed that the vision could be expanded to include reference to culture. Recommend to include reference to culture within the vision
SO17/492/1861	Alan Kinnersley	Yes		Support noted
SO17/493/1862	Newcastle under Lyme Liberal Democrats	Yes	This is not a proper vision, just an introductory statement of good intent; it lacks detail and therefore means very little.	Comments Noted. It is considered important that the Joint Local Plan incorporates a vision which sets out what the plan area will look like if the

Reference	Consultee	Consultee Response	Consultee Comments	Officers Comments
				plans strategy, aims, objectives and policies are followed. We recognise that it early in the plan making process and therefore further detail will be set out at the draft plan stage in line with the proposed vision.
SO17/494/1863	Janet Burgess	Don't know / unsure		Noted
SO17/495/1864	Ms Finney	No	This is not a vision, you falsely claim that we have active communities - UNTRUE you closed all facilities that allow active communities. There is NO supportive new and innovative development for Kidsgrove either now or in your future plans. How can you claim to protect natural environment when you will sell it off to developers. All Kidsgrove has is take aways!	Comments noted
SO17/496/1865	Glenis Woodcock	No	Your vision is not shared by the people of Kidsgrove - you don't know we are here until you want something.	Comments noted
SO17/497/1866	Madeley Parish Council and Neighbourhood Plan Steering Group	Yes		Support noted
SO17/498/1867	Ray Williams	Yes		Support noted
SO17/499/1868	FUCHS Lubricants (UK) plc	Yes	The Joint Local Plan would appear the most sustainable and logical solution for setting the long term policies and objectives for the area.	Support noted
SO17/500/1869	Gwyn Griffiths	Don't know / unsure	Such "vision statements" tend to be meaningless platitudes.	Comments noted. It is considered important that the Joint Local Plan incorporates a vision which sets out what the plan area will look like if the plans strategy, aims, objectives and policies are followed. We recognise that it is early in the plan making process and further detail will be set out at

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				the draft plan stage.
SO17/454/1872	Cynthia England	Yes		Support noted
SO17/742/1873	Araripe Limited	No	Whilst the proposed vision conveys a clear message that the Councils will promote the economy and attract investment, we are disappointed that the proposed vision no longer sets a target of improving prosperity across the communities of the joint plan area. This is a laudable component of the adopted vision, and we believe should remain at the heart of any new plan for the area. Economic prosperity is intrinsically linked with the achievement of other social and environmental sustainability objectives, so provides a clear and measurable target for the plan period. We also note that the vision is silent on the issue of climate change. We believe that the vision should acknowledge, and show a commitment towards mitigating and adapting to the adverse effects associated with climate change.	Comments are noted. The vision could be expanded to include reference to prosperous communities and increasing the amount of high quality employment, retail and residential choice. The vision could also acknowledge the impact of climate change and the need to minimise the impact of this upon our urban and rural areas. Recommend to include minimising the impact on climate change within the vision

Question 2: Strategic Aims and Objectives

Six key aims are identified in the Strategic Options Consultation Document together with a range of accompanying objectives. Will these aims and objectives help to deliver the vision for both Stoke-on-Trent and Newcastle-under-Lyme?

Yes;

No;

Don't know / unsure

Reference	Consultee	Consultee Response	Consultee Comments	Officer Comments
SO17/15/1729	Gary Picken	Yes	N/A	Supported Noted
SO17/17/1730	B Isaac, G Downs and J Talbot	Yes	Agrees that the six key aims and objectives will help to deliver the vision for both Stoke-on-Trent and Newcastle-under-Lyme. However state it is of upmost importance that Aim 1 'UK Central Hub for Innovation and Investment' should be worded so that it would be more specific in terms of the sectors of employment growth that will be targeted. Recommends that the strategic aims and objectives instead be targeted towards the growth of more high-skilled jobs coming forward and for these to be more closely aligned with the growth of further and higher education, taking into account the opportunities that are provided by the presence of Staffordshire and Keele universities. Employment growth therefore needs to be linked closely to promoting science and technology research as well as through other skill bases that the universities specialise in. To these ends, the plan must facilitate high quality employment growth within these sectors including bringing forward the requisite level of sites to facilitate high quality employment growth. In so doing, this will play a vital role in attracting and retaining graduates and thereby reducing out-migration	It is agreed that the Joint Local Plan aims to diversify the employment base, for different sectors, and encourage the growth of further and higher education sectors. To this end these are incorporated as objectives to the plan. However in terms of specific sectors the planning policies which will be incorporated within the Draft Local Plan are considered to be a more appropriate location for such detail, linked to site allocations.

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SO17/19/1731	Mr G Adams	Yes	Agrees that the six key aims and objectives will help to deliver the vision for both Stoke-on-Trent and Newcastle-under-Lyme. However state it is of upmost importance that Aim 1 'UK Central Hub for Innovation and Investment' should be worded so that it would be more specific in terms of the sectors of employment growth that will be targeted. Recommends that the strategic aims and objectives instead be targeted towards the growth of more high-skilled jobs coming forward and for these to be more closely aligned with the growth of further and higher education, taking into account the opportunities that are provided by the presence of Staffordshire and Keele universities. Employment growth therefore needs to be linked closely to promoting science and technology research as well as through other skill bases that the universities specialise in. To these ends, the plan must facilitate high quality employment growth within these sectors including bringing forward the requisite level of sites to facilitate high quality employment growth. In so doing, this will play a vital role in attracting and retaining graduates and thereby reducing out-migration	It is agreed that the Joint Local Plan aims to diversify the employment base, for different sectors, and encourage the growth of further and higher education sectors. To this end these are incorporated as objectives to the plan. However in terms of specific sectors the planning policies which will be incorporated within the Draft Local Plan are considered to be a more appropriate location for such detail, linked to site allocations.
SO17/16/1732	Ian Jefferies	Yes	Agrees that the six key aims and objectives will help to deliver the vision for both Stoke-on-Trent and Newcastle-under-Lyme. However state it is of upmost importance that Aim 1 'UK Central Hub for Innovation and Investment' should be worded so that it would be more specific in terms of the sectors of employment growth that will be targeted. Recommends that the strategic aims and objectives instead be targeted towards the growth of more high-skilled jobs coming forward and for these to be more closely aligned with the growth of further and higher education, taking into	It is agreed that the Joint Local Plan aims to diversify the employment base, for different sectors, and encourage the growth of further and higher education sectors. To this end these are incorporated as objectives to the plan. However in terms of specific sectors the planning policies which will be incorporated within the Draft Local Plan are considered to be a more appropriate location for such detail, linked to site allocations.

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SO17/18/1733	J, R and M Hollins	Yes	Agrees that the six key aims and objectives will help to deliver the vision for both Stoke-on-Trent and Newcastle-under-Lyme. However state it is of upmost importance that Aim 1 'UK Central Hub for Innovation and Investment' should be worded so that it would be more specific in terms of the sectors of employment growth that will be targeted. Recommends that the strategic aims and objectives instead be targeted towards the growth of more high-skilled jobs coming forward and for these to be more closely aligned with the growth of further and higher education, taking into account the opportunities that are provided by the presence of Staffordshire and Keele universities. Employment growth therefore needs to be linked closely to promoting science and technology research as well as through other skill bases that the universities specialise in. To these ends, the plan must facilitate high quality employment growth within these sectors including bringing forward the requisite level of sites to facilitate high quality employment growth. In so doing, this will play a vital role in attracting and retaining graduates and thereby reducing out-migration	It is agreed that the Joint Local Plan aims to diversify the employment base, for different sectors, and encourage the growth of further and higher education sectors. To this end these are incorporated as objectives to the plan. However in terms of specific sectors the planning policies which will be incorporated within the Draft Local Plan are considered to be a more appropriate location for such detail, linked to site allocations.

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SO17/14/1734	Julie Everst Young	Yes	Agrees that the six key aims and objectives will help to deliver the vision for both Stoke-on-Trent and Newcastle-under-Lyme. However state it is of upmost importance that Aim 1 'UK Central Hub for Innovation and Investment' should be worded so that it would be more specific in terms of the sectors of employment growth that will be targeted. Recommends that the strategic aims and objectives instead be targeted towards the growth of more high-skilled jobs coming forward and for these to be more closely aligned with the growth of further and higher education, taking into account the opportunities that are provided by the presence of Staffordshire and Keele universities. Employment growth therefore needs to be linked closely to promoting science and technology research as well as through other skill bases that the universities specialise in. To these ends, the plan must facilitate high quality employment growth within these sectors including bringing forward the requisite level of sites to facilitate high quality employment growth. In so doing, this will play a vital role in attracting and retaining graduates and thereby reducing out-migration	It is agreed that the Joint Local Plan aims to diversify the employment base, for different sectors, and encourage the growth of further and higher education sectors. To this end these are incorporated as objectives to the plan. However in terms of specific sectors the planning policies which will be incorporated within the Draft Local Plan are considered to be a more appropriate location for such detail, linked to site allocations.
SO17/21/1735	Mazar Hussain	Yes	Agrees that the six key aims and objectives will help to deliver the vision for both Stoke-on-Trent and Newcastle-under-Lyme. However state it is of upmost importance that Aim 1 'UK Central Hub for Innovation and Investment' should be worded so that it would be more specific in terms of the sectors of employment growth that will be targeted. Recommends that the strategic aims and objectives instead be targeted towards the growth of more high-skilled jobs coming forward and for these to be more closely aligned with the growth of further and higher education, taking into	It is agreed that the Joint Local Plan aims to diversify the employment base, for different sectors, and encourage the growth of further and higher education sectors. To this end these are incorporated as objectives to the plan. However in terms of specific sectors the planning policies which will be incorporated within the Draft Local Plan are considered to be a more appropriate location for such detail, linked to site allocations.

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SO17/13/1736	P Marson, J Marson and A Manning	Yes	Agrees that the six key aims and objectives will help to deliver the vision for both Stoke-on-Trent and Newcastle-under-Lyme. However state it is of utmost importance that Aim 1 'UK Central Hub for Innovation and Investment' should be worded so that it would be more specific in terms of the sectors of employment growth that will be targeted. Recommends that the strategic aims and objectives instead be targeted towards the growth of more high-skilled jobs coming forward and for these to be more closely aligned with the growth of further and higher education, taking into account the opportunities that are provided by the presence of Staffordshire and Keele universities. Employment growth therefore needs to be linked closely to promoting science and technology research as well as through other skill bases that the universities specialise in. To these ends, the plan must facilitate high quality employment growth within these sectors including bringing forward the requisite level of sites to facilitate high quality employment growth. In so doing, this will play a vital role in attracting and retaining graduates and thereby reducing out-migration	It is agreed that the Joint Local Plan aims to diversify the employment base, for different sectors, and encourage the growth of further and higher education sectors. To this end these are incorporated as objectives to the plan. However in terms of specific sectors the planning policies which will be incorporated within the Draft Local Plan are considered to be a more appropriate location for such detail, linked to site allocations.

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SO17/12/1737	Smartbuild & Design Limited	Yes	Agrees that the six key aims and objectives will help to deliver the vision for both Stoke-on-Trent and Newcastle-under-Lyme. However state it is of upmost importance that Aim 1 'UK Central Hub for Innovation and Investment' should be worded so that it would be more specific in terms of the sectors of employment growth that will be targeted. Recommends that the strategic aims and objectives instead be targeted towards the growth of more high-skilled jobs coming forward and for these to be more closely aligned with the growth of further and higher education, taking into account the opportunities that are provided by the presence of Staffordshire and Keele universities. Employment growth therefore needs to be linked closely to promoting science and technology research as well as through other skill bases that the universities specialise in. To these ends, the plan must facilitate high quality employment growth within these sectors including bringing forward the requisite level of sites to facilitate high quality employment growth. In so doing, this will play a vital role in attracting and retaining graduates and thereby reducing out-migration	It is agreed that the Joint Local Plan aims to diversify the employment base, for different sectors, and encourage the growth of further and higher education sectors. To this end these are incorporated as objectives to the plan. However in terms of specific sectors the planning policies which will be incorporated within the Draft Local Plan are considered to be a more appropriate location for such detail, linked to site allocations.
SO17/20/1738	TFK Property Limited	Yes	Agrees that the six key aims and objectives will help to deliver the vision for both Stoke-on-Trent and Newcastle-under-Lyme. However state it is of upmost importance that Aim 1 'UK Central Hub for Innovation and Investment' should be worded so that it would be more specific in terms of the sectors of employment growth that will be targeted. Recommends that the strategic aims and objectives instead be targeted towards the growth of more high-skilled jobs coming forward and for these to be more closely aligned with the growth of further and higher education, taking into	It is agreed that the Joint Local Plan aims to diversify the employment base, for different sectors, and encourage the growth of further and higher education sectors. To this end these are incorporated as objectives to the plan. However in terms of specific sectors the planning policies which will be incorporated within the Draft Local Plan are considered to be a more appropriate location for such detail, linked to site allocations.

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SO17/93/1741	David Bourne	Yes	Focus on up to date evidence rather than the roles places have served in the past.	Comments Noted. The White Young Green Retail and Leisure Study (2014) which forms part of the evidence for the Joint Local Plan recognises the significant changes and loss of retail in some of the traditional Stoke-on-Trent centres. It is the intention that there will be policies within the plan and a revised hierarchy of centres which can reflect the uniqueness, scale and future potential of each of the towns.
SO17/92/1742	Dennis Weston	Yes	Transport and railway infrastructure including HS2 is important for local prosperity.	Support Noted
SO17/90/1743	Malcolm Clowes	Not answered	Aim 1 - Needs to include challenges posed by the geographic location i.e. between Manchester and Birmingham, lack of public funding for highway infrastructure, transportation innovation and changes to online shopping practices. Aim 2 – needs to address quality housing in the right locations, changing demographic profile with more older people and its specific needs for housing and care. Aim 3 needs to keep pace with change and relies on up to date evidence to shape the type, range and size of homes that people need, e.g. from specialist housing, house	Comments Noted. It is considered important that the Joint Local Plan incorporates a vision which sets out what the plan area will look like if the plans strategy, aims, objectives and policies are followed. We recognise that it is early in the plan making process and therefore further detail in terms of type of housing/employment/retail provision and the infrastructure requirements on a site by site basis will be provided at the Draft Plan stage, in line with the vision, aims and objectives.

Reference	Consultee	Consultee Response	Consultee Comments	Officer Comments
			sharing and aspirational homes for high-earners. Aim 5 need to support private investment in edge of centre locations where it would deliver change that accords with the vision. Aim 6 needs to include using the past to support future innovation such as delivering and servicing housing.	
SO17/95/1744	Mrs M Hall	Not answered	N/A	Noted
SO17/96/1745	The Woodland Trust	Yes	Response suggests improving Aim 2 to include measures to improve air quality, along with wider benefits of trees and woodland in urban areas for people, communities, climate change adaptation and carbon sequestration. Aim 4 could also include the value of trees and woodlands as natural assets to protect from harm, and use opportunities to secure more trees and woodlands where development is proposed.	Comment noted. With regard to air quality this is already included as an objective under Aim 2 - Healthy and Active communities which states 'to improve air quality across the plan area, mitigating health risks along with the impacts on climate change'. However it is acknowledged that greater reference to landscape and trees could be included within the vision.
SO17/97/1746	Renew Land Developments LTD	Yes	Aim 1 needs to be more specific about the sectors for employment growth. The strategic aims and objectives should be targeted towards growth in high-skilled jobs, aligning to growth in further and higher education in Staffordshire and Keele Universities. Employment growth needs to be aligned to the universities specialisms in order to grow jobs in the sectors that will retain and attract young people and graduates.	Comments noted. It is considered important that the Joint Local Plan incorporates aims and objectives which sets out what the plan area will look like if the plans strategy, aims, objectives and policies are followed. We recognise that it is early in the plan making process and therefore further detail in terms of type of employment and the infrastructure requirements on a site by site basis will be provided at the Draft Plan stage, in line with the vision, aims and objectives. This will ensure there is a balance and mix of sites which can meet the requirements and ensure development is directed towards the most appropriate locations.
SO17/94/1747	Robert Almond	Not answered	N/A	Noted

Reference	Consultee	Consultee Response	Consultee Comments	Officer Comments
SO17/91/1748	Newcastle-under-Lyme Borough Council (Regeneration)	Yes	N/A	Support Noted
SO17/146/1749	Richard Atherton	No	The strategic aims and objectives should be targeted towards growth in high-skilled jobs, aligning to growth in further and higher education in Staffordshire and Keele Universities. Employment growth needs to be aligned to the universities specialisms in order to grow jobs in the sectors that will retain and attract young people and graduates.	It is agreed that the Joint Local Plan aims to diversify the employment base, for different sectors, and encourage the growth of further and higher education sectors. To this end these are incorporated as objectives to the plan. However in terms of specific sectors the planning policies which will be incorporated within the Draft Local Plan are considered to be a more appropriate location for such detail, linked to site allocations.
SO17/166/1750	Andrew Alexander	Yes	Aim 1 needs to be more specific about the specific sectors for employment growth. The strategic aims and objectives should be targeted towards growth in high-skilled jobs, aligning to growth in further and higher education in Staffordshire and Keele Universities. Employment growth needs to be aligned to the universities specialisms in order to grow jobs in the sectors that will retain and attract young people and graduates.	It is agreed that the Joint Local Plan aims to diversify the employment base, for different sectors, and encourage the growth of further and higher education sectors. To this end these are incorporated as objectives to the plan. However in terms of specific sectors the planning policies which will be incorporated within the Draft Local Plan are considered to be a more appropriate location for such detail, linked to site allocations.
SO17/163/1752	Ascalon properties	Yes	N/A	Support Noted
SO17/178/1753	Aspire Housing	Yes	Aim 1 needs to be more specific about the sectors for employment growth. The strategic aims and objectives should be targeted towards growth in high-skilled jobs, aligning to growth in further and higher education in Staffordshire and Keele Universities. Employment growth needs to be aligned to the universities specialisms in order to grow jobs in the sectors that will retain and attract young people and graduates. Support offered for Aim 3 as it aligns with Aspire's	Support Noted. It is agreed that the Joint Local Plan aims to diversify the employment base, for different sectors, and encourage the growth of further and higher education sectors. To this end these are incorporated as objectives to the plan. However in terms of specific sectors the planning policies which will be incorporated within the Draft Local Plan are considered to be a more appropriate location for such detail, linked to site allocations.

Reference	Consultee	Consultee Response	Consultee Comments	Officer Comments
			objective of supporting residents of North Staffordshire to move from benefits and into work in order to mitigate the impact of Government welfare reform policy and to grow the economic base of the area.	
SO17/182/1757	D2H	Not answered	Although the Aims and Objectives are appropriate there needs to be greater emphasis on infrastructure provision. Policy framework will need to be robust and flexible to support ambitious and aspirational vision.	Support and comments noted
SO17/162/1759	Dean Lewis Estates	No	Viability of housing requires a diverse portfolio of housing choice. Amendments required relating to Viability, meeting the housing OAN; wider context of area-wide regeneration including the aspirations of the Constellation Partnership Strategy including HS2; not protecting the countryside for its own sake; addressing designations that are barriers to sustainable development; acknowledged need for greenfield development in sustainable locations as part of the overall development strategy.	Comments noted. In terms of viability and the type and range of sites it is the intention that the plan will include detailed policies and that the provision of the policies will be explained within the Draft Plan. Whilst the councils agree these are important; the aims of the plan will lead more detailed policies in this regard and the plan itself will demonstrate that it has included a mix of sites. It is agreed that sustainable development is a key requirement of the plan.
SO17/171/1760	Dr D Hodgkinson	Yes	Aim 1 needs to be more specific about the sectors for employment growth. The strategic aims and objectives should be targeted towards growth in high-skilled jobs, aligning to growth in further and higher education in Staffordshire and Keele Universities. Employment growth needs to be aligned to the universities specialisms in order to grow jobs in the sectors that will retain and attract young people and graduates.	It is agreed that the Joint Local Plan aims to diversify the employment base, for different sectors, and encourage the growth of further and higher education sectors. To this end these are incorporated as objectives to the plan. However in terms of specific sectors the planning policies which will be incorporated within the Draft Local Plan are considered to be a more appropriate location for such detail, linked to site allocations.
SO17/169/1762	Elmside Garden Centre	Yes	Aim 1 needs to be more specific about the sectors for employment growth. The strategic aims and objectives should be targeted towards	It is agreed that the Joint Local Plan aims to diversify the employment base, for different sectors, and encourage the growth of further and

Reference	Consultee	Consultee Response	Consultee Comments	Officer Comments
			growth in high-skilled jobs, aligning to growth in further and higher education in Staffordshire and Keele Universities. Employment growth needs to be aligned to the universities specialisms in order to grow jobs in the sectors that will retain and attract young people and graduates.	higher education sectors. To this end these are incorporated as objectives to the plan. However in terms of specific sectors the planning policies which will be incorporated within the Draft Local Plan are considered to be a more appropriate location for such detail, linked to site allocations.
SO17/159/1764	G Colclough-Evans	Yes	Aim 1 needs to be more specific about the sectors for employment growth. The strategic aims and objectives should be targeted towards growth in high-skilled jobs, aligning to growth in further and higher education in Staffordshire and Keele Universities. Employment growth needs to be aligned to the universities specialisms in order to grow jobs in the sectors that will retain and attract young people and graduates.	It is agreed that the Joint Local Plan aims to diversify the employment base, for different sectors, and encourage the growth of further and higher education sectors. To this end these are incorporated as objectives to the plan. However in terms of specific sectors the planning policies which will be incorporated within the Draft Local Plan are considered to be a more appropriate location for such detail, linked to site allocations
SO17/152/1765	Maer Hills Protection Group	No	The aging population in the area resulted in there being less new employment development, and less prospects for the future other than in care of the elderly for new jobs other than care of the elderly. New manufacturing has by-passed the area and HS2 is unlikely to stop at Stoke-on-Trent. Will there be as much need for housing as older people vacate current properties and move into more suitable accommodation, freeing up homes for younger people.	Comments Noted, but respondent assumes that younger people leaving the area for work elsewhere is a trend that the Joint Local Plan would not want to reverse; and assumes that there is enough accommodation for older people to move into which may not be the case.
SO17/150/1766	Gary Dean Associates Ltd	No	N/A	Comments Noted. Encouraging the improvement of digital connectivity is recognised as being important to encouraging business growth within the area and this is not currently included within this aim. IT is agreed that this can be included.
SO17/147/1767	Mark T Coupe	No	Aim 1 - Needs to include challenges posed by the geographic location i.e. between Manchester and Birmingham, lack of public funding for highway infrastructure, transportation innovation and	Comments Noted. It is considered important that the Joint Local Plan incorporates a vision which sets out what the plan area will look like if the plans strategy, aims, objectives and policies are

Reference	Consultee	Consultee Response	Consultee Comments	Officer Comments
			<p>changes to online shopping practices.</p> <p>Aim 2 – needs to address quality housing in the right locations, changing demographic profile with more older people and its specific needs for housing and care. Aim 3 needs to keep pace with change and relies on up to date evidence to shape the type, range and size of homes that people need, e.g. from specialist housing, house sharing and aspirational homes for high-earners.</p> <p>Aim 5 need to support private investment in edge of centre locations where it would deliver change that accords with the vision. Aim 6 needs to include using the past to support future innovation such as delivering and servicing housing.</p>	<p>followed. We recognise that it is early in the plan making process and therefore further detail in terms of type of housing/employment/retail provision and the infrastructure requirements on a site by site basis will be provided at the Draft Plan stage, in line with the vision, aims and objectives.</p>
SO17/145/1768	WW Planning	No	<p>Aim 1 - Needs to include challenges posed by the geographic location i.e. between Manchester and Birmingham, lack of public funding for highway infrastructure, transportation innovation and changes to online shopping practices.</p> <p>Aim 2 – needs to address quality housing in the right locations, changing demographic profile with more older people and its specific needs for housing and care. Aim 3 needs to keep pace with change and relies on up to date evidence to shape the type, range and size of homes that people need, e.g. from specialist housing, house sharing and aspirational homes for high-earners.</p> <p>Aim 5 need to support private investment in edge of centre locations where it would deliver change that accords with the vision. Aim 6 needs to include using the past to support future innovation such as delivering and servicing housing.</p>	<p>Comments Noted. It is considered important that the Joint Local Plan incorporates a vision which sets out what the plan area will look like if the plans strategy, aims, objectives and policies are followed. We recognise that it is early in the plan making process and therefore further detail in terms of type of housing/employment/retail provision and the infrastructure requirements on a site by site basis will be provided at the Draft Plan stage, in line with the vision, aims and objectives.</p>
SO17/172/1769	Graham Heath Group	Yes	The strategic aims and objectives should be	It is agreed that the Joint Local Plan aims to

Reference	Consultee	Consultee Response	Consultee Comments	Officer Comments
			targeted towards growth in high-skilled jobs, aligning to growth in further and higher education in Staffordshire and Keele Universities. Employment growth needs to be aligned to the universities specialisms in order to grow jobs in the sectors that will retain and attract young people and graduates.	diversify the employment base, for different sectors, and encourage the growth of further and higher education sectors. To this end these are incorporated as objectives to the plan. However in terms of specific sectors the planning policies which will be incorporated within the Draft Local Plan are considered to be a more appropriate location for such detail, linked to site allocations.
SO17/161/1772	Historic England	Not answered	Supports inclusion of an aim for historic environment, although historic environment can feature as a thread through a range of the aims stated adding value throughout the Joint Local Plan.	Comments Noted. With regard to specific sites these will be set out in more detailed policies within the Draft Joint Local Plan. It is agreed that Aim 6 (bullet point 2) could be amended to state heritage assets.
SO17/167/1773	Ian Dos Remedios	Yes	The strategic aims and objectives should be targeted towards growth in high-skilled jobs, aligning to growth in further and higher education in Staffordshire and Keele Universities. Employment growth needs to be aligned to the universities specialisms in order to grow jobs in the sectors that will retain and attract young people and graduates.	It is agreed that the Joint Local Plan aims to diversify the employment base, for different sectors, and encourage the growth of further and higher education sectors. To this end these are incorporated as objectives to the plan. However in terms of specific sectors the planning policies which will be incorporated within the Draft Local Plan are considered to be a more appropriate location for such detail, linked to site allocations.
SO17/184/1774	Intu Properties plc	Yes	Supports Aim 05 of the Joint Local Plan seeks to deliver a strong City Centre and market town with a diverse network of distinct towns and villages. However further work and evidence is required to ensure that further stages of the Joint Local Plan provide suitable policies for the hierarchy of retail centres.	Comments Noted. It is agreed that more detail needs to be provided on retail and leisure within the plan. This will be set out at the Preferred Options and Draft Plan stages once further evidence has been prepared on the implications of the different growth levels and scenarios in terms of retail and leisure provision and centres.
SO17/168/1775	J A Knight (Coppice) Ltd	Yes	The strategic aims and objectives should be targeted towards growth in high-skilled jobs, aligning to growth in further and higher education in Staffordshire and Keele Universities. Employment growth needs to be aligned to the	It is agreed that the Joint Local Plan aims to diversify the employment base, for different sectors, and encourage the growth of further and higher education sectors. To this end these are incorporated as objectives to the plan. However

Reference	Consultee	Consultee Response	Consultee Comments	Officer Comments
			universities specialisms in order to grow jobs in the sectors that will retain and attract young people and graduates.	in terms of specific sectors the planning policies which will be incorporated within the Draft Local Plan are considered to be a more appropriate location for such detail, linked to site allocations.
SO17/151/1776	The Strategic Land Group	No	Suggests revisions to Aims to ensure they are NPPF compliant	Comments Noted. In terms of viability and the type and range of sites it is the intention that the plan will include detailed policies on the provision of infrastructure, education, greenspace etc and that the provision of the policies will be explained within the Draft Plan. Whilst the councils agree these are important; the aims of the plan will lead more detailed policies in this regard and the plan itself will demonstrate that it has included a mix of sites. However it is agreed that an emphasis could be included that a range of sites will be required to meet the plans objectives. In terms of Aim 4 - natural assets it is agreed that the word 'enhance' can be included to ensure this is compliant with the NPPF. In terms of brownfield land it is agreed that the consideration of sustainable development patterns it also important in this regard and the wording can be amended to reflect this.
SO17/165/1777	John Sanders	Yes	Aim 1 needs to be more specific about the sectors for employment growth. The strategic aims and objectives should be targeted towards growth in high-skilled jobs, aligning to growth in further and higher education in Staffordshire and Keele Universities. Employment growth needs to be aligned to the universities specialisms in order to grow jobs in the sectors that will retain and attract young people and graduates.	It is agreed that the Joint Local Plan aims to diversify the employment base, for different sectors, and encourage the growth of further and higher education sectors. To this end these are incorporated as objectives to the plan. However in terms of specific sectors the planning policies which will be incorporated within the Draft Local Plan are considered to be a more appropriate location for such detail, linked to site allocations.
SO17/175/1778	Keele Homes	Yes	Aim 1 needs to be more specific about the sectors for employment growth. The strategic aims and objectives should be targeted towards	It is agreed that the Joint Local Plan aims to diversify the employment base, for different sectors, and encourage the growth of further and

Reference	Consultee	Consultee Response	Consultee Comments	Officer Comments
			growth in high-skilled jobs, aligning to growth in further and higher education in Staffordshire and Keele Universities. Employment growth needs to be aligned to the universities specialisms in order to grow jobs in the sectors that will retain and attract young people and graduates.	higher education sectors. To this end these are incorporated as objectives to the plan. However in terms of specific sectors the planning policies which will be incorporated within the Draft Local Plan are considered to be a more appropriate location for such detail, linked to site allocations.
SO17/176/1779	Keele University	Yes	N/A	Support Noted
SO17/170/1780	Keith Eardley	Not answered	Aim 1 needs to be more specific about the sectors for employment growth. The strategic aims and objectives should be targeted towards growth in high-skilled jobs, aligning to growth in further and higher education in Staffordshire and Keele Universities. Employment growth needs to be aligned to the universities specialisms in order to grow jobs in the sectors that will retain and attract young people and graduates.	It is agreed that the Joint Local Plan aims to diversify the employment base, for different sectors, and encourage the growth of further and higher education sectors. To this end these are incorporated as objectives to the plan. However in terms of specific sectors the planning policies which will be incorporated within the Draft Local Plan are considered to be a more appropriate location for such detail, linked to site allocations.
SO17/158/1781	Mr Jones	No	Suggests revisions to Aims to ensure they are NPPF compliant.	Comments Noted. In terms of viability and the type and range of sites it is the intention that the plan will include detailed policies on the provision of infrastructure, education, greenspace etc and that the provision of the policies will be explained within the Draft Plan. Whilst the councils agree these are important; the aims of the plan will lead more detailed policies in this regard and the plan itself will demonstrate that it has included a mix of sites. However it is agreed that an emphasis could be included that a range of sites will be required to meet the plans objectives. In terms of Aim 4 - natural assets it is agreed that the word 'enhance' can be included to ensure this is compliant with the NPPF. In terms of brownfield land it is agreed that the consideration of sustainable development patterns it also important in this regard and the wording can be

Reference	Consultee	Consultee Response	Consultee Comments	Officer Comments
				amended to reflect this.
SO17/149/1782	St Modwen Developments Ltd	No	The vision fails to include 'growth' and without it the aims fail to make a connection between the vision and the aims.	Comments Noted. It is agreed that the vision could be clearer in terms of reflecting the levels of growth that the councils are seeking to accommodate within the plan.
SO17/177/1786	Mr and Mrs Rawlins	Yes	Aim 1 needs to be more specific about the sectors for employment growth. The strategic aims and objectives should be targeted towards growth in high-skilled jobs, aligning to growth in further and higher education in Staffordshire and Keele Universities. Employment growth needs to be aligned to the universities specialisms in order to grow jobs in the sectors that will retain and attract young people and graduates.	It is agreed that the Joint Local Plan aims to diversify the employment base, for different sectors, and encourage the growth of further and higher education sectors. To this end these are incorporated as objectives to the plan. However in terms of specific sectors the planning policies which will be incorporated within the Draft Local Plan are considered to be a more appropriate location for such detail, linked to site allocations.
SO17/180/1787	Mr C and Mrs S Taylor	Yes	Aim 1 needs to be more specific about the sectors for employment growth. The strategic aims and objectives should be targeted towards growth in high-skilled jobs, aligning to growth in further and higher education in Staffordshire and Keele Universities. Employment growth needs to be aligned to the universities specialisms in order to grow jobs in the sectors that will retain and attract young people and graduates.	It is agreed that the Joint Local Plan aims to diversify the employment base, for different sectors, and encourage the growth of further and higher education sectors. To this end these are incorporated as objectives to the plan. However in terms of specific sectors the planning policies which will be incorporated within the Draft Local Plan are considered to be a more appropriate location for such detail, linked to site allocations.
SO17/181/1788	Mr and Mrs E Woodall	Yes	Response agrees with the aims, objectives and themes identified but questions the order of priority and whether some need to be expanded. The response also questions the logic of not considering the impacts of HS2 on the Joint Local Plan.	Comments noted. It is considered important that the Joint Local Plan incorporates aims and objectives which sets out what the plan area will look like if the plans strategy, aims, objectives and policies are followed. We recognise that it is early in the plan making process and therefore further detail in terms of type of sites and the infrastructure requirements on a site by site basis will be provided at the Draft Plan stage, in line with the vision, aims and objectives. This will ensure there is a balance and mix of sites which

Reference	Consultee	Consultee Response	Consultee Comments	Officer Comments
				can meet the requirements of the plan. As the Plan progresses so will the planning phase for HS2, coupled with the Constellation Partnership's strategies for the area these may inform later stages of plan preparation.
SO17/160/1793	Peter Brett Associates	Not answered	We support Key Aim 3 and specific observations are agree that improving economic competitiveness across the Joint Local Plan area will help to decrease outward migration and supplying a balanced mix of housing will contribute to improving economic competitiveness. We endorse the stated requirement to meet both local and aspirational housing needs. We support the need to increase the number of homes, as the evidence makes clear, the provision of housing will have to increase substantially in order to meet the significantly higher growth targets.	Support Noted
SO17/154/1795	Lands Improvements Holdings	Yes	The aims and objectives support the delivery of the proposed vision for Stoke-on-Trent and Newcastle-under-Lyme. The broad approach of responding to identified need through the delivery of additional housing and employment land is supported.	Support Noted
SO17/157/1796	Richborough Estates	No	Aim 1 needs to be more specific about the sectors for employment growth. The strategic aims and objectives should be targeted towards growth in high-skilled jobs, aligning to growth in further and higher education in Staffordshire and Keele Universities. Employment growth needs to be aligned to the universities specialisms in order to grow jobs in the sectors that will retain and attract young people and graduates.	The councils evidence and strategic options consultation document supports attracting high quality employment to the area and supports the university's; colleges and higher education establishments within the Plan area to help to improve skills for young adults and to seek jobs within the local area. However it is agreed that the vision does not explicitly refer to higher education/learning. In terms of specific sectors the planning policies which will be incorporated

Reference	Consultee	Consultee Response	Consultee Comments	Officer Comments
			Aim 3, decreasing net outward migration is a theme that has been continued from the Core Strategy. As alluded to under Aim 1, improving economic competitiveness can only be achieved through a step-change in the quality and type of the employment offer in the area, which will require the two authorities to identify key sectors where quality employment growth can be delivered. This must be done in partnership with the LEP, Chamber of Commerce, key employers and the higher education sectors, in particular, Keele and Staffordshire Universities. The housing offer and employment offer are intrinsically linked and the overall range and quality of both will be key to reducing net outward migration and promoting the area as a great place to live and work.	within the Draft Local Plan are considered to be a more appropriate location for such detail, linked to site allocations than setting these out in the objectives. It is agreed that the plan needs to demonstrate that it can deliver a range of housing types across the plan area, which can be set out more specifically within Aim 3.
SO17/156/1798	Stoke-on-Trent City Council (Housing)	Not answered	It is imperative that jobs and skills growth is provided to deliver the step change in housing. It is critical to the future of Stoke-on-Trent to provide for larger homes in attractive environments so that individuals are not compelled to look outside of the City for their housing options. As the plan progresses, the explicit link between housing growth and aspirations and the types of jobs and skills necessary is strengthened.	Comments Noted. It is agreed that as the plan progresses further details will be provided on the range of housing and employment sites that are required to meet the aims and objectives of the plan.
SO17/174/1799	SOT Regeneration Ltd and Mr Poole	No	The aims and objectives will not deliver the vision. Aim 1 should identify which sectors of job growth will be targeted. Arrange of employment types are needed, including higher-end, high-skilled jobs. Aim 1 should incorporate learning and research	It is agreed that the Joint Local Plan aims to diversify the employment base, for different sectors, and encourage the growth of further and higher education sectors. To this end these are incorporated as objectives to the plan. However in terms of specific sectors the planning policies which will be incorporated within the Draft Local

Reference	Consultee	Consultee Response	Consultee Comments	Officer Comments
			<p>linking this to promoting and growing new sectors of employment.</p> <p>Improving economic competitiveness can only be achieved through a step-change in the quantity, quality and type of the employment offer in the area. This must be done in partnership with the LEP, Chamber of Commerce, key employers and the higher education sectors - in particular, Keele and Staffordshire Universities.</p> <p>Key to attracting and retaining graduates and other skilled workers will be improving the range and quality of the housing offer. The housing offer and employment offer are intrinsically linked and the overall quality of both will be key to reducing net outward migration and promoting the area as a great place to live and work.</p>	<p>Plan are considered to be a more appropriate location for such detail, linked to site allocations. The councils recognise the importance of partnership working and improve the range and type of housing on offer. However it is agreed that an emphasis could be included that a range of sites will be required to meet the plans objectives.</p>
SO17/183/1800	St Modwen Developments Ltd, Stoke-on-Trent Regeneration Ltd and St Modwen Securities Ltd	No	The objective under Aim 3 should be more than just reducing out-migration. The objective should enable the provision of employment opportunities and new housing to retain and attract residents within the area.	Comments noted. The aims and objectives should be seen together as setting out what the plan area will look like; however it is acknowledged that it is not just about increasing the number of homes to help decrease outward migration, these homes need to meet the needs of the area. Therefore it is considered appropriate to include reference to needing a range of sites capable of delivering the type and mix of housing required. In terms of Aim 5 it is considered that the aim does refer to the importance of lower order centres as the second bullet states 'to promote appropriate growth and investment in a distinct network of larger towns, sustainable villages and local centres across the plan area'.
SO17/173/1801	Staffordshire County	Not	Aim 1 should be expanded to recognise that	Comments noted. It is considered important that

Reference	Consultee	Consultee Response	Consultee Comments	Officer Comments
	Council	answered	<p>growth needs to be accommodated through necessary local highway and sustainable transport improvements and enhanced connectivity to the wider strategic road and rail network.</p> <p>Aim 2 further clarification is required regarding the meaning of 'innovative' modes of active travel.</p> <p>Aim 4 should recognise that adverse impacts of climate change will be minimised by reducing vehicle fuel consumption.</p> <p>The plan needs to take account of the recently adopted Local Plan for Cheshire East as part of the duty to cooperate, which sets out plans to greatly increase net commuting from 1,400 (at the time of the 2011 Census) to around 9,000 by 2030. Significantly increased levels of commuting between Cheshire East and North Staffordshire may have infrastructure implications. The agreement for Staffordshire County Council and Cheshire East Council to work together to, "Facilitate the delivery of improved cross boundary transport connectivity between Cheshire East and north Staffordshire," is an issue that will need to be considered further as the preferred option is developed.</p> <p>The objective, "To decrease net outward migration from Stoke-on-Trent and Newcastle-under-Lyme by improving economic competitiveness as well as supplying a balanced variety of housing to meet needs across the housing market area to retain and attract</p>	<p>the Joint Local Plan incorporates aims and objectives which sets out what the plan area will look like if the plans strategy, aims, objectives and policies are followed. We recognise that it is early in the plan making process and therefore further detail in terms of type of employment and the infrastructure requirements on a site by site basis will be provided at the Draft Plan stage, in line with the vision, aims and objectives. This will ensure there is a balance and mix of sites which can meet the requirements of the plan. However it is agreed that an emphasis could be included that a range of sites will be required to meet the plans objectives.</p>

Reference	Consultee	Consultee Response	Consultee Comments	Officer Comments
			<p>population in the rural and urban areas.” could be reworded “To increase the level of net migration to Stoke-on-Trent and Newcastle-under-Lyme by improving economic competitiveness as well as supplying a balanced variety of housing to meet needs across the housing market area to retain and attract population in the rural and urban areas.”</p> <p>This would better reflect the updated SHMA which assumes a higher level of net migration to the Housing Market Area in order to support jobs growth, a fundamental aim set out within the Strategic Options document.</p>	
SO17/164/1802	Stephen Beaumont	Yes	<p>Aim 1 should be more specific about the sectors of employment growth that will be targeted.</p> <p>The strategic aims and objectives should target the growth of high-skilled jobs aligned with the growth of further and higher education, particularly Staffordshire and Keele Universities. Employment growth should be linked to promoting science and technology research as well as through other skill bases that the universities specialise in. The plan should bring forward the sites to facilitate high quality employment growth and this will play a vital role in attracting and retaining graduates and reducing out-migration.</p>	It is agreed that the Joint Local Plan aims to diversify the employment base, for different sectors, and encourage the growth of further and higher education sectors. To this end these are incorporated as objectives to the plan. However in terms of specific sectors the planning policies which will be incorporated within the Draft Local Plan are considered to be a more appropriate location for such detail, linked to site allocations.
SO17/148/1805	Lichfields	Yes	Aim 5 is supported. The Council needs to take a pro-active approach to strengthening the strategic	Comments Noted. It is agreed that more detail needs to be provided on retail and leisure within

Reference	Consultee	Consultee Response	Consultee Comments	Officer Comments
			<p>role of the City Centre and recognise the importance of Intu Potteries and the Hive. Intu's plans for future investment in the area around Intu Potteries and The Hive should be central to the achievement of this aim of the Joint Local Plan.</p> <p>While housing and employment matters are important, more detail needs to be provided on retail and main town centre uses. Retail and leisure needs over the plan period should be considered and the plan should ensure the City Centre is not further threatened by inappropriate out-of-centre development.</p>	the plan. This will be set out at the Preferred Options and Draft Plan stages once further evidence has been prepared on the implications of the different growth levels and scenarios in terms of retail and leisure provision and centres.
SO17/179/1808	Urban Vision North Staffordshire	Not answered	The aims and objectives are supported however there needs to be a greater emphasis on infrastructure and the role of design and heritage in achieving sustainable economic growth.	Support and comments noted
SO17/376/1811	Mineral Products Association	Not answered	Aim 4 should also include the safeguarding of mineral resources and infrastructure/ production sites.	Support noted
SO17/381/1812	Graham and Sylvia Rowe	Don't Know / Unsure	N/A	Noted
SO17/379/1814	Mrs M.A. Wareham	Don't Know / Unsure	N/A	Noted
SO17/374/1815	Carl Edwards	Yes	Aim 1 should be more specific about the sectors of employment growth that will be targeted. The growth of high skilled jobs and the opportunities provided by Staffordshire and Keele University's should be encouraged. Employment growth should be linked to promoting science and technology research as well as through other skill bases that the universities specialise in.	It is agreed that the Joint Local Plan aims to diversify the employment base, for different sectors, and encourage the growth of further and higher education sectors. To this end these are incorporated as objectives to the plan. However in terms of specific sectors the planning policies which will be incorporated within the Draft Local Plan are considered to be a more appropriate location for such detail, linked to site allocations.

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			The plan should facilitate high quality employment growth within these sectors including bringing forward the sites to enable high quality employment growth. This will attract and retain graduates and reduce out-migration.	
SO17/382/1816	Mrs S Y Cornes	No	N/A	Noted
SO17/383/1817	Pat Lee	Yes	N/A	Support Noted
SO17/375/1819	Muller Property Group	Yes	<p>The aims and objectives are supported. However, the policies in the plan need to be sufficiently flexible to deliver a sufficient amount of development in a range of locations.</p> <p>Aim 1 is supported. The plan should look to actively support and boost business growth and diversify the employment base in urban and rural areas and the growth of further and higher education sectors and training is supported. New housing is required to support employment growth.</p> <p>The diversification of the area's economic base to a hub for innovation and investment will create new managerial positions. High quality housing will need to be provided in order to attract and retain the managerial workforce within the local area.</p> <p>Aim 3 - Dynamic and Diverse Neighbourhoods, is supported. Sufficient quantum housing should be delivered in a range of locations in order to deliver choice and competition for market land.</p>	Support and comments noted. It is considered appropriate to amend the wording to bullet point 4 of Aim 4 to encourage the development of sustainable brownfield land, in line with the NPPF.

Reference	Consultee	Consultee Response	Consultee Comments	Officer Comments
			Aim 4 is not consistent with the requirements of the Framework as it seeks to "prioritise" rather than 'encourage' the development of sustainable brownfield land. The Local Plan should "encourage" the development of previously developed land but allocations should be based on delivery and achieving the overall objective of increasing the amount of development in the area and diversifying the economic base.	
SO17/377/1821	Sam Loweth	Yes	N/A	support noted
SO17/380/1823	Whitmore Parish Council	Yes	The aims and objectives are noted. The Councils' need to take quicker control over housing supply issues.	Comments Noted
SO17/503/1824	Neale Sheldon	No	Comment that rural villages do not have the capacity to accommodate additional development. There are brownfield sites near the city that could be developed.	Comments noted. The objectives set out under Aim 4 aim to encourage the development of sustainable brownfield land, however recognition of the potential environmental and ecological impacts on some of these sites also needs to be recognised, as included within this aim.
SO17/504/1825	Stephanie Evans	Don't know / unsure	N/A	Noted
SO17/505/1826	Steven Malam	No	N/A	Noted
SO17/506/1827	Theatres Trust	Don't know / unsure	N/A	Noted
SO17/507/1828	Jill Freeman	Don't know / unsure	The document contains too much jargon.	Noted
SO17/508/1829	Michael Hall	Don't know / unsure	N/A	Noted
SO17/509/1830	The Connecting Tracks Project	Don't know / unsure	Not applicable	Noted

Reference	Consultee	Consultee Response	Consultee Comments	Officer Comments
SO17/510/1831	Andrew Wickens	Not answered	Aims 3 and 5 overlap. One of the aims could have an educational focus given that there are two Universities within the area. If the area is to attract jobs, planning for the way businesses contribute to training will be key.	Comments noted. However with regard to not including an educational focus, Aim 1 (bullet 4) does include this and states 'To encourage the growth of the further and higher education sector and training facilities'. It is also agreed that a greater focus to the universities could be included within the vision to the plan.
SO17/511/1832	Richard Nicholl	Yes	N/A	Support Noted
SO17/512/1833	Donald Butterworth	Yes	N/A	Support Noted
SO17/513/1834	Paul Baddeley	Yes	More detail is required about improving public transport. Having the city centre as the main target for investment will assist bus operators to provide more services.	It is considered that Aim 2 - Healthy and Active communities includes adequate reference to encouraging and supporting public transport, this states 'To reduce the need to travel, improve accessibility and increase the opportunities for sustainable and innovative modes of active travel.'
SO17/514/1835	Loggerheads Parish Council	Yes	N/A	Support Noted
SO17/515/1836	Adri Hartveld	Don't know / unsure	N/A	Noted
SO17/516/1837	Karl Deakes	Don't know / unsure	N/A	Noted
SO17/517/1838	Catherine Salt	Yes	N/A	Support Noted
SO17/518/1839	Mr and Mrs Phillips	Not answered	The plan should protect the beauty and rural aspects of the area.	Comments Noted
SO17/519/1840	Carlton Woolley	No	Brownfield land should be utilised and better used made of redundant colliery sites. Development should be focused on existing conurbations and	Comments noted. The councils acknowledge that it is early in the plan's preparation; therefore the full details of the Joint Local Plan policies

Reference	Consultee	Consultee Response	Consultee Comments	Officer Comments
			aim to bring life into city and town centres rather than building retail developments and logistics sites.	have not been set out as yet. The inclusion of site allocations and details planning policies will be included within the Preferred Options and Draft Plan stages.
SO17/520/1841	Natural England	Yes	Support the objectives. Comment that the term 'green infrastructure' would be preferable to 'greenspaces' as this is a broader term. Landscape character should be included within the 'utilising our natural assets and resources' section	Support Noted. The councils have updated their evidence on greenspace and more detailed policies within the plan with recognise the importance of green corridors will be included at the draft plan stage. It is agreed that the vision could be clearer in terms of protection of landscape.
SO17/521/1842	Jacqueline Karen Reynolds	Yes	The plan should aim to protect the beauty and rural aspect of the area.	Support Noted
SO17/522/1843	Lynne Woolley	Don't know / unsure	Youth obesity levels in Stoke-on-Trent are some of the highest in the country.	Noted. Aim 2 (bullet point 2) states that the plan aims 'To support and promote healthy and active communities and improve physical and mental health and wellbeing through the design and appropriate siting of development.'
SO17/523/1844	John Lamont	Don't know / unsure	N/A	Noted
SO17/524/1845	Janet Lamont	Don't know / unsure	More consideration should be given to heritage and natural environment assets.	Comments Noted.
SO17/525/1846	Sport England	Yes	There are opportunities to encourage physical activity through new development proposals and also through creating linkages with existing employment, shopping, and school facilities. The inclusion of concepts within the document 'Active Design' is encouraged.	Support Noted
SO17/526/1847	M Davies	Don't know / unsure	N/A	Noted

Reference	Consultee	Consultee Response	Consultee Comments	Officer Comments
SO17/527/1848	Staffordshire Chambers of Commerce	Yes	N/A	Support Noted
SO17/528/1849	Keele Parish Council and Neighbourhood Plan	Yes	The aims and objectives are lacking in detail. Culture and sport should be included.	Support Noted. It is agreed that the vision should incorporate reference to culture. With regard to support it is considered that Aim 2 (bullet 1) covers this which states - 'To ensure that new development makes adequate provision for all necessary community facilities including health care, education, sports and recreation and leisure and that the quality and accessibility of existing facilities are enhanced and retained where they provide for the justified community needs.'
SO17/529/1850	Peter Jones	No	N/A	Noted
SO17/530/1851	Angela Clarke	No	N/A	Noted
SO17/531/1852	Canal & River Trust	Not answered	<p>The canal network can make a significant contribution to Aim 2: Healthy and Active Communities.</p> <p>Aim 4 refers to protecting and utilising the canal network. It is important that the role that canals play in supporting biodiversity is recognised and any development minimises impact on wildlife.</p> <p>Aim 6 is relevant to the canal network and it should be protected and enhanced.</p> <p>The canals are important visitor attractions and appropriate development can enhance this.</p>	Support noted. The councils have also updated their evidence base on green spaces and green corridors; this includes recognising the importance of the canal network.
SO17/532/1853	Packmoor Residents Association	No	The document focuses too much upon housing and construction and not enough on infrastructure and business innovation.	Comments noted. The plan is at an early stage of production and the detailed policies and supporting documents will identify the

Reference	Consultee	Consultee Response	Consultee Comments	Officer Comments
			Concern that there will be a displacement of higher end tax payers to Newcastle and Staffordshire Moorlands resulting in a drop in house prices. Increasing investment in infrastructure and attracting jobs will reverse this trend.	infrastructure required on a site by site basis to deliver the plan. This will be set out within an Infrastructure delivery Plan.
SO17/533/1854	Wenslie Naylor	Yes	A further aim is suggested to order to promote culture and sport within the plan area. This could be delivered through the delivery of a large site.	Comments Noted. It is considered that any detailed opportunities for sport can be outlined within the plan which can meet the existing objective under Aim 2 which states 'To ensure that new development makes adequate provision for all necessary community facilities including health care, education, sports and recreation and leisure and that the quality and accessibility of existing facilities are enhanced and retained where they provide for the justified community needs'. It is agreed that further reference to culture could be made within Aim 6 to ensure that performance arts and the theatre are recognised.
SO17/534/1855	Stephen Peake	No	N/A	Noted
SO17/535/1856	Sue Sandywell	No	N/A	Noted
SO17/536/1857	Jennifer Cook	Don't know / unsure	N/A	Noted
SO17/537/1858	Kidsgrove Independents	No	N/A	Noted
SO17/538/1859	Audley Rural Parish Council	Yes	Aim 5 could be undermined by growth options 5 & 6	Comments noted
SO17/539/1860	Alderman David Becket	Yes	A lack of resources could impact upon the delivery of Aim 6.	Comments Noted

Reference	Consultee	Consultee Response	Consultee Comments	Officer Comments
SO17/540/1861	Alan Kinnersley	Yes	N/A	Support Noted
SO17/541/1862	Newcastle under Lyme Liberal Democrats	Don't know / unsure	<p>The aims and objectives lack sufficient detail.</p> <p>Latest technology and ideas should be reflected in the aims and objectives for example in relation to renewable technology and provision for cyclists.</p> <p>Effective remediation monitoring of sites is required.</p>	Comments noted however it is important to note that the Joint Local Plan will incorporate more detail through a detailed preferred strategy, development management policies and site allocations. We recognise that it is early in the plan making process and therefore detail will be set out at the draft plan stage in line with the proposed vision, aims and objectives.
SO17/542/1863	Janet Burgess	Don't know / unsure	N/A	Noted
SO17/543/1864	Ms Finney	No	N/A	Noted
SO17/544/1865	Glenis Woodcock	No	N/A	Noted
SO17/545/1866	Madeley Parish Council and Neighbourhood Plan Steering Group	Yes	N/A	Support Noted
SO17/546/1867	Ray Williams	No	N/A	Noted
SO17/547/1868	FUCHS Lubricants (UK) plc	No	The options appear to cover broadly the issues that will have an impact on the effectiveness of the plan.	Comments Noted
SO17/548/1869	Gwyn Griffiths	Yes	N/A	Support Noted
SO17/502/1872	Cynthia England	Yes	N/A	Support Noted
SO17/743/1873	Araripe Limited	Yes	In general, we agree with the Aims, Objectives	Comments noted. It is considered important that

Reference	Consultee	Consultee Response	Consultee Comments	Officer Comments
			<p>and themes identified, although we would question their order of priority and whether certain objectives need to be expanded upon. For example, at paragraph 4.6 of the consultation document, it states that the “primary aim of the Joint Local Plan is to address locating new homes in sustainable locations to meet the identified needs and aspirations of the Housing Market Area which Newcastle and Stoke share”. If delivering housing is the “primary aim” then “Dynamic & Diverse Neighbourhoods” (currently AIM 03), should be promoted to AIM 01 with other aims following on from this.</p> <p>We also note that many of the objectives outlined under AIM 02 assume, or require housing development to take place before the objectives would become relevant. It would therefore seem logical to prioritise the delivery of new homes before the associated infrastructure currently identified under AIM 02.</p> <p>In terms of the Aim of achieving a “UK Central Hub for Innovation and Investment”, this is clearly an ambitious target, but one which could be of considerable benefit to the economy if successful, and we support this. We do however note that the Councils do not intend to take into account HS2 as part of the Joint Local Plan. This approach is in our view questionable given that the government has now introduced the High-Speed Rail (West Midlands to Crewe) Bill into Parliament (17th July 2017). Now the Bill is passing through parliament, we believe this issue cannot be ignored in a plan, which is clearly intended to cover a period when HS2 anticipated to be</p>	<p>the Joint Local Plan incorporates aims and objectives which sets out what the plan area will look like if the plans strategy, aims, objectives and policies are followed. We recognise that it is early in the plan making process and therefore further detail in terms of type of sites and the infrastructure requirements on a site by site basis will be provided at the Draft Plan stage, in line with the vision, aims and objectives. This will ensure there is a balance and mix of sites which can meet the requirements of the plan. As the Plan progresses so will the planning phase for HS2, coupled with the Constellation Partnership's strategies for the area these may inform later stages of plan preparation.</p>

Reference	Consultee	Consultee Response	Consultee Comments	Officer Comments
			operational i.e. 2027. Although HS2 will not stop within the Joint Plan area, there will inevitably be a sphere of economic influence around the proposed station at Crewe, and the Councils should plan positively to take advantage of this; particularly as HS2 is likely to result in increased demand for housing in locations such as Talke which have good access to Crewe.	

Question 3: Housing growth scenarios

The Consultation Document identifies 4 housing growth scenarios which set out different levels of housing provision between 2013 and 2033. Which of the housing growth scenarios do you consider should be preferred?

- A: Carry forward existing levels of housing growth
- B: Supporting our natural population growth
- C: Supporting economic growth
- D: Maximising our economic potential
- Don't know / unsure
- An alternative option

Reference	Consultee	Consultee Response	Consultee Comments	Officer Comments
SO17/25/1729	Gary Picken	C An alternative option	Whilst I am supportive of the housing growth outlined in option C, the local plan should take account of a balanced land use strategy. So I would like to see the local plan to have an environmental improvement counterbalance with any non-brownfield (virgin fields) usage being compensated by the creation of new public greenfield spaces from former brownfield sites - ideally on a ratio similar when TPO trees are replaced i.e. on a 2 or 3 to 1 ratio therefore enhancing both Stoke on Trent's environmental performance providing sustainability development strategy and simple aesthetics improvements delivering a positive cohesive local plan.	Support for option C is noted. The SHLAA looks at the constraints on the sites and then assess it accordingly. Once the sites are selected, the local plan policy and the development management policy will guide the development to ensure that any adverse impacts are mitigated.
SO17/27/1730	B Isaac, G Downs and J Talbot	D	Whilst our client strongly supports Growth Scenario D, should the Councils decide not to proceed with this option, and instead to run with Growth Scenario C, it is recommended that that housing option be pursued as a minimum level but with an additional uplift or windfall allowance of 10% to allow for any slippage or non-implementation of any large housing allocations. The Strategic Housing Land Availability	Support for option D is noted. There is not considered to be sufficient information available regarding the likely effects of some of the projects referred to. Furthermore, as any resulting effects might occur towards the end of the plan-period it is considered appropriate to account of their impact through the production of a future Local Plans.

Reference	Consultee	Consultee Response	Consultee Comments	Officer Comments
			<p>Assessment (SHLAA) 2017 for Newcastle-under-Lyme acknowledges that the Council can only demonstrate a 1.8 year housing land supply (a significant under provision of the five year housing land supply requirements as set out in paragraph 47 of the Framework). Furthermore, Stoke-on-Trent City Council can also not demonstrate a five year housing land supply. Future SHLAAs could be produced to provide a comparison of the implementation rates set against the numbers of dwellings that had been granted permission; this would provide a mechanism for any additional uplift in windfall provision to be allowed during the plan period.</p> <p>The redrawing of the settlement boundaries at Keele to accommodate our client's site would bring forward circa 3 - 5 dwellings which could contribute to delivering Growth Scenario D.</p>	
SO17/29/1731	Mr G Adams	D	<p>Whilst our client strongly supports Growth Scenario D, should the Councils decide not to proceed with this option, and instead to run with Growth Scenario C, it is recommended that that housing option be pursued as a minimum level but with an additional uplift or windfall allowance of 10% to allow for any slippage or non-implementation of any large housing allocations. The Strategic Housing Land Availability Assessment (SHLAA) 2017 for Newcastle-under-Lyme acknowledges that the Council can only demonstrate a 1.8 year housing land supply (a significant under provision of the five year housing land supply requirements as set out in paragraph 47 of the Framework). Furthermore, Stoke-on-Trent City Council can also not demonstrate a five year housing land supply. Future SHLAAs could</p>	<p>Support for option D is noted.</p> <p>There is not considered to be sufficient information available regarding the likely effects of some of the projects referred to. Furthermore, as any resulting effects might occur towards the end of the plan-period it is considered appropriate to account of their impact through the production of a future Local Plans.</p>

Reference	Consultee	Consultee Response	Consultee Comments	Officer Comments
			<p>be produced to provide a comparison of the implementation rates set against the numbers of dwellings that had been granted permission; this would provide a mechanism for any additional uplift in windfall provision to be allowed during the plan period.</p> <p>The provision of circa 4 - 5 executive dwelling on our client's site at Manor Road, Baldwin's Gate could significantly contribute to delivering Growth Scenario D.</p>	
SO17/26/1732	Ian Jefferies	D An alternative option	<p>Whilst our client strongly supports Growth Scenario D, should the Councils decide not to proceed with this option, and instead to run with Growth Scenario C, it is recommended that that housing option be pursued as a minimum level but with an additional uplift or windfall allowance of 10% to allow for any slippage or non-implementation of any large housing allocations. The Strategic Housing Land Availability Assessment (SHLAA) 2017 for Newcastle-under-Lyme acknowledges that the Council can only demonstrate a 1.8 year housing land supply (a significant under provision of the five year housing land supply requirements as set out in paragraph 47 of the Framework). Furthermore, Stoke-on-Trent City Council can also not demonstrate a five year housing land supply. Future SHLAAs could be produced to provide a comparison of the implementation rates set against the numbers of dwellings that had been granted permission; this would provide a mechanism for any additional uplift in windfall provision to be allowed during the plan period.</p> <p>The redrawing of the settlement boundaries at</p>	<p>Support for option D is noted.</p> <p>There is not considered to be sufficient information available regarding the likely effects of some of the projects referred to. Furthermore, as any resulting effects might occur towards the end of the plan-period it is considered appropriate to account of their impact through the production of a future Local Plans.</p>

Reference	Consultee	Consultee Response	Consultee Comments	Officer Comments
			Keele to accommodate our client's site would bring forward circa 3 - 5 dwellings which could contribute to delivering Growth Scenario D.	
SO17/28/1733	J, R and M Hollins	D	<p>Whilst our client strongly supports Growth Scenario D, should the Councils decide not to proceed with this option, and instead to run with Growth Scenario C, it is recommended that housing option be pursued as a minimum level but with an additional uplift or windfall allowance of 10% to allow for any slippage or non-implementation of any large housing allocations. The Strategic Housing Land Availability Assessment (SHLAA) 2017 for Newcastle-under-Lyme acknowledges that the Council can only demonstrate a 1.8 year housing land supply (a significant under provision of the five year housing land supply requirements as set out in paragraph 47 of the Framework). Furthermore, Stoke-on-Trent City Council can also not demonstrate a five year housing land supply. Future SHLAAs could be produced to provide a comparison of the implementation rates set against the numbers of dwellings that had been granted permission; this would provide a mechanism for any additional uplift in windfall provision to be allowed during the plan period.</p> <p>It is considered that the provision of circa 5 family dwelling at Land at Leycett Road, Scot Hay could contribute to delivering Growth Scenario D.</p>	<p>Support for option D is noted.</p> <p>There is not considered to be sufficient information available regarding the likely effects of some of the projects referred to. Furthermore, as any resulting effects might occur towards the end of the plan-period it is considered appropriate to account of their impact through the production of a future Local Plans.</p>
SO17/24/1734	Julie Everst Young	D An alternative option	Whilst our client strongly supports Growth Scenario D, should the Councils decide not to proceed with this option, and instead to run with Growth Scenario C, it is recommended that that	Noted support for Option D with some support for Option C as a minimum with an appropriate buffer applied to counter potential for non-implementation.

Reference	Consultee	Consultee Response	Consultee Comments	Officer Comments
			<p>housing option be pursued as a minimum level but with an additional uplift or windfall allowance of 10% to allow for any slippage or non-implementation of any large housing allocations. The Strategic Housing Land Availability Assessment (SHLAA) 2017 for Newcastle-under-Lyme acknowledges that the Council can only demonstrate a 1.8 year housing land supply (a significant under provision of the five year housing land supply requirements as set out in paragraph 47 of the Framework). Furthermore, Stoke-on-Trent City Council can also not demonstrate a five year housing land supply. Future SHLAAs could be produced to provide a comparison of the implementation rates set against the numbers of dwellings that had been granted permission; this would provide a mechanism for any additional uplift in windfall provision to be allowed during the plan period.</p> <p>Our client owns the site at Caverswall Lane (south of Caverswall Park Farm) which has the capacity to accommodate up to 235no. dwellings which could come through during the plan period and could significantly contribute to delivering Growth Scenario D.</p>	<p>There is not considered to be sufficient information available regarding the likely effects of some of the projects referred to. Furthermore, as any resulting effects might occur towards the end of the plan-period it is considered appropriate to account of their impact through the production of a future Local Plans.</p>
SO17/31/1735	Mazar Hussain	D	<p>Whilst our client strongly supports Growth Scenario D, should the Councils decide not to proceed with this option, and instead to run with Growth Scenario C, it is recommended that that housing option be pursued as a minimum level but with an additional uplift or windfall allowance of 10% to allow for any slippage or non-implementation of any large housing allocations. The Strategic Housing Land Availability Assessment (SHLAA) 2017 for Newcastle-under-</p>	<p>Support for option D is noted.</p> <p>There is not considered to be sufficient information available regarding the likely effects of some of the projects referred to. Furthermore, as any resulting effects might occur towards the end of the plan-period it is considered appropriate to account of their impact through the production of a future Local Plans.</p>

Reference	Consultee	Consultee Response	Consultee Comments	Officer Comments
			<p>Lyme acknowledges that the Council can only demonstrate a 1.8 year housing land supply (a significant under provision of the five year housing land supply requirements as set out in paragraph 47 of the Framework). Furthermore, Stoke-on-Trent City Council can also not demonstrate a five year housing land supply. Future SHLAAs could be produced to provide a comparison of the implementation rates set against the numbers of dwellings that had been granted permission; this would provide a mechanism for any additional uplift in windfall provision to be allowed during the plan period.</p> <p>Our client's site at Land at Eaves Lane, Bucknall could accommodate circa 168no. dwelling during the plan period and this could significantly contribute to delivering Growth Scenario D.</p>	
SO17/23/1736	P Marson, J Marson and A Manning	D	<p>Whilst our clients strongly support Growth Scenario D, should the Councils decide not to proceed with this option, and instead to run with Growth Scenario C, it is recommended that that housing option be pursued as a minimum level but with an additional uplift or windfall allowance of 10% to allow for any slippage or non-implementation of any large housing allocations. The Strategic Housing Land Availability Assessment (SHLAA) 2017 for Newcastle-under-Lyme acknowledges that the Council can only demonstrate a 1.8 year housing land supply (a significant under provision of the five year housing land supply requirements as set out in paragraph 47 of the Framework). Furthermore, Stoke-on-Trent City Council can also not demonstrate a five year housing land supply. Future SHLAAs could be produced to provide a comparison of the</p>	<p>Noted support for Option D with some support for Option C as a minimum with an appropriate buffer applied to counter potential for non-implementation.</p> <p>There is not considered to be sufficient information available regarding the likely effects of some of the projects referred to. Furthermore, as any resulting effects might occur towards the end of the plan-period it is considered appropriate to account of their impact through the production of a future Local Plans.</p>

Reference	Consultee	Consultee Response	Consultee Comments	Officer Comments
			<p>implementation rates set against the numbers of dwellings that had been granted permission; this would provide a mechanism for any additional uplift in windfall provision to be allowed during the plan period.</p> <p>Our clients' sites could significantly contribute to delivering Growth Scenario D</p>	
SO17/22/1737	Smartbuild & Design Limited	D	<p>It is only through Growth Scenario D, which proposes to provide 36,280 new houses during the plan period, that the Housing Market Area can deliver in excess of the OAN that has been identified in the Strategic Housing Market Assessment (SHMA). In fact, paragraph 4.4 of the Options consultation acknowledges that the increase in population of 44,000 during the plan period under Scenario D would only result in a 'moderate' 13-14% increase in population, which is below the national averaged increase of 17%. If the Joint Local Plan is to be aspiring for higher growth in order to compete with neighbouring Cheshire East and Stafford Borough Councils (for example), then it should be aspiring to achieve growth that is commensurate with the national average. Only by delivering above the OAN level can the Councils hope to realistically achieve the economic objectives that have been set out in their six Strategic Aims as well as enable these areas to compete with the economic areas that are located in neighbouring authorities. Whilst our client strongly supports Growth Scenario D, should the Councils decide not to proceed with this option, and instead to run with Growth Scenario C, it is recommended that that housing option be pursued as a minimum level but with an additional uplift or windfall allowance of</p>	<p>Noted support for Option D with some support for Option C as a minimum with an appropriate buffer applied to counter potential for non-implementation.</p> <p>There is not considered to be sufficient information available regarding the likely effects of some of the projects referred to. Furthermore, as any resulting effects might occur towards the end of the plan-period it is considered appropriate to account of their impact through the production of a future Local Plans.</p>

Reference	Consultee	Consultee Response	Consultee Comments	Officer Comments
			10% to allow for any slippage or non-implementation of any large housing allocations. The Strategic Housing Land Availability Assessment (SHLAA) 2017 for Newcastle-under-Lyme acknowledges that the Council can only demonstrate a 1.8 year housing land supply (a significant under provision of the five year housing land supply requirements as set out in paragraph 47 of the Framework). Furthermore, Stoke-on-Trent City Council can also not demonstrate a five year housing land supply. Future SHLAAs could	
SO17/30/1738	TFK Property Limited	D	<p>Whilst our client strongly supports Growth Scenario D, should the Councils decide not to proceed with this option, and instead to run with Growth Scenario C, it is recommended that that housing option be pursued as a minimum level but with an additional uplift or windfall allowance of 10% to allow for any slippage or non-implementation of any large housing allocations. The Strategic Housing Land Availability Assessment (SHLAA) 2017 for Newcastle-under-Lyme acknowledges that the Council can only demonstrate a 1.8 year housing land supply (a significant under provision of the five year housing land supply requirements as set out in paragraph 47 of the Framework). Furthermore, Stoke-on-Trent City Council can also not demonstrate a five year housing land supply. Future SHLAAs could be produced to provide a comparison of the implementation rates set against the numbers of dwellings that had been granted permission; this would provide a mechanism for any additional uplift in windfall provision to be allowed during the plan period.</p> <p>The provision of circa 250 dwelling at Land at</p>	<p>Support for option D is noted.</p> <p>There is not considered to be sufficient information available regarding the likely effects of some of the projects referred to. Furthermore, as any resulting effects might occur towards the end of the plan-period it is considered appropriate to account of their impact through the production of a future Local Plans.</p>

Reference	Consultee	Consultee Response	Consultee Comments	Officer Comments
			Milton Works, Diamond Crescent, Milton would significantly contribute to delivering Growth Scenario D.	
SO17/73/1739	Chris Flanagan	An alternative option	Supporting the needs of the population in terms of housing, health, work, culture.	No preferred option appears to have been selected. The OAN takes on board the needs of the area.
SO17/75/1741	David Bourne	C	Option C - Housing growth by itself is pointless - the city will stagnate if we don't also provide quality jobs to support residents - This also needs to be supported by improvements to other sectors such as schools, recreation and leisure, retail, and infrastructure. However we need the money to do so. Hence, the tick to economic growth. With less government funding coming the way, economic growth must be a priority.	The Local Plan is supporting the delivery of employment land as well as housing and will be actively promoting this, for example as with the Enterprise Zones. There will be an Infrastructure Delivery Plan to support the Local Plan, detailing the timely delivery of infrastructure. This will be written after Duty to Cooperate discussions with infrastructure providers.
SO17/74/1742	Dennis Weston	C	Common Sense dictates the objectively assessed need (OAN) is supported as a minimum and therefore maximising our economic potential should be aimed for. It is not clear however where 36,280 houses are to be built i.e 1814 (houses per year) x 20 years = 36,280. Support for a site adjacent to Primrose Hill for residential development, however the surrounding area should be protected.	Support for option C noted. The spatial growth options, along with the indicative capacity of each option to accommodate an amount of housing growth, are presented in the strategic option consultation document. The site you refer to, if it has been brought to the attention of the council via a call for sites submission, will be considered once a preferred spatial growth strategy has been identified.
SO17/71/1743	Malcolm Clowes	Don't know / unsure	This is a really difficult area of projection. What is most certainly true however is that any projection will be wrong. In migration choices, birth and death rates alongside cultural and societal changes and economics will all play a part in determining how much growth ought to be planned for. There may indeed be considerable merit in simply planning for high levels of growth	The Council considers that the evidence is based upon robust evidence and provides an accurate base to set the housing requirement on. The NPPF asks to significantly boost housing delivery, but also to be realistic.

Reference	Consultee	Consultee Response	Consultee Comments	Officer Comments
			<p>both to meet any which does occur but also to send a clear and positive message to investors and the public that the area does indeed aspire to growth and has a positive and pro-growth agenda. This could be especially important post RENEW which in its policy base and practice sent a very anti-growth message and held the area back for too many years.</p> <p>Accordingly aiming towards maximum growth is favoured.</p>	
SO17/77/1744	Mrs M Hall	A		Support for option A noted.
SO17/78/1745	The Woodland Trust	Not answered	Our main concern is that no ancient woodland or ancient or veteran trees are adversely impacted by whatever option you choose. Other than that we do not have sufficient local knowledge to give an opinion as to where new housing should be developed.	Comments are noted. The SHLAA looks at the constraints on the sites and then assess it accordingly. Once the sites are selected, the local plan policy and the development management policy will guide the development to ensure that any adverse impacts are mitigated.
SO17/79/1746	Renew Land Developments LTD	D		Support for option D noted.
SO17/76/1747	Robert Almond	A		Support for option A noted
SO17/72/1748	Newcastle-under-Lyme Borough Council (Regeneration)	C	The need for an independent assessment of the market appeal of the urban sites being considered for housing development (and how this therefore impacts on build out rates of the local housing offer). The Newcastle Western Extension proposal (c. 2700 housing units), for instance, is fully	Support for option c noted. Comments regarding the importance of job creation and the suggestion of an assessment of market appeal will be given consideration. SHLAA sites have been subjected to a high level viability assessment those sites which progress through towards the later stages of

Reference	Consultee	Consultee Response	Consultee Comments	Officer Comments
			<p>costed. How many of the more significant urban housing proposals under consideration are demonstrably viable and deliverable? If these do not come forward, the area will be very short of attractive housing development sites and the better off will continue to drift out to Stafford and South Cheshire.</p> <p>More jobs and the availability of attractive housing opportunities are both key to turning around outmigration and the tendency for the population in urban areas to age (as the young and mobile move out) leaving behind a poorer and more dependant population with less spending power. We have to be realistic about the extent to which many of the brownfield sites in less attractive parts of Newcastle and Stoke-on-Trent will appeal top developers and their customers.</p>	the Local Plan will be tested further in terms of their viability and deliverability.
SO17/188/1749	Richard Atherton	C	<p>Whilst our client strongly supports Growth Scenario D, should the Councils decide not to proceed with this option, and instead to run with Growth Scenario C, it is recommended that that housing option be pursued as a minimum level but with an additional uplift or windfall allowance of 10% to allow for any slippage or non-implementation of any large housing allocations. The Strategic Housing Land Availability Assessment (SHLAA) 2017 for Newcastle-under-Lyme acknowledges that the Council can only demonstrate a 1.8 year housing land supply (a significant under provision of the five year housing land supply requirements as set out in paragraph 47 of the Framework).</p>	<p>Support for option C noted.</p> <p>The need for a contingency will be considered at subsequent stages of the Plan.</p>

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SO17/211/1750	Andrew Alexander	D	<p>Whilst our client strongly supports Growth Scenario D, should the Councils decide not to proceed with this option, and instead to run with Growth Scenario C, it is recommended that that housing option be pursued as a minimum level but with an additional uplift or windfall allowance of 10% to allow for any slippage or non-implementation of any large housing allocations. The Strategic Housing Land Availability Assessment (SHLAA) 2017 for Newcastle-under-Lyme acknowledges that the Council can only demonstrate a 1.8 year housing land supply (a significant under provision of the five year housing land supply requirements as set out in paragraph 47 of the Framework). Furthermore, Stoke-on-Trent City Council can also not demonstrate a five year housing land supply. Future SHLAAs could be produced to provide a comparison of the implementation rates set against the numbers of dwellings that had been granted permission; this would provide a mechanism for any additional uplift in windfall provision to be allowed during the plan period.</p> <p>Our client's site at Buddeleigh Farm, Betley could contribute to delivering Growth Scenario D.</p>	<p>Support for option D noted.</p> <p>There is not considered to be sufficient information available regarding the likely effects of some of the projects referred to. Furthermore, as any resulting effects might occur towards the end of the plan-period it is considered appropriate to account of their impact through the production of a future Local Plans.</p>
SO17/208/1752	Ascalon properties	D	<p>We support Growth Scenario D</p> <p>Scenarios A and B and C will not give the opportunity to meet the OAN and therefore restrict economic growth and quality of life.</p>	Support for option D noted.
SO17/225/1753	Aspire Housing	D	<p>Whilst our client strongly supports Growth Scenario D, should the Councils decide not to proceed with this option, and instead to run with Growth Scenario C, it is recommended that that</p>	<p>Support for option D is noted.</p> <p>There is not considered to be sufficient information available regarding the likely effects of some of the</p>

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			<p>housing option be pursued as a minimum level but with an additional uplift or windfall allowance of 10% to allow for any slippage or non-implementation of any large housing allocations. The Strategic Housing Land Availability Assessment (SHLAA) 2017 for Newcastle-under-Lyme acknowledges that the Council can only demonstrate a 1.8 year housing land supply (a significant under provision of the five year housing land supply requirements as set out in paragraph 47 of the Framework). Furthermore, Stoke-on-Trent City Council can also not demonstrate a five year housing land supply. Future SHLAAs could be produced to provide a comparison of the implementation rates set against the numbers of dwellings that had been granted permission; this would provide a mechanism for any additional uplift in windfall provision to be allowed during the plan period.</p> <p>Aspire Housing are themselves submitting various sites through the Call for Sites exercise in addition to making representations under Strategic Options. They intend to apply for further planning permissions on a number of sites during the plan period, with the quantum of development within such sites ranging from below 5no. dwellings to others above 5no. dwellings. These sites will generally consist of brownfield sites which are now surplus to requirements. The development proposals would be in the form of affordable housing and/or market housing, dependent upon whether there is a need for affordable housing in that area or whether market housing is proposed with the aim of generating funds to go towards to delivery of affordable housing elsewhere. The</p>	<p>projects referred to. Furthermore, as any resulting effects might occur towards the end of the plan-period it is considered appropriate to account of their impact through the production of a future Local Plans.</p>

Reference	Consultee	Consultee Response	Consultee Comments	Officer Comments
			bringing forward of these sites would have a cumulative effect of contributing towards the delivery of Growth Scenario D.	
SO17/223/1754	Betley, Balterley & Wrinehill Neighbourhood Plan Steering Group and Parish Council	An alternative option	<p>The Steering Group strongly queries these assumptions which significantly inflate the housing requirements included in the JLP's OAN, and take the projected figures to 2039 beyond the plan period. The argument underpinning level of housing provision is that to meet the 17,000 jobs required to support the North Staffs' economy with an ageing population and, therefore, an insufficient labour force, the population requires to increase by 44,000 or by 13 to 14%, and which will need to be housed, at annual growth rate never previously attained. The projected growth now considered necessary is based on key assumptions of an annual inward migration of 958 people, the retention of students educated in the area, a high level of household formation including hidden households, (those wanting but are unable to establish independent households). Without the additional houses it is argued that there will be an insufficient labour force to support the predicted level of employment required. 586 new dwellings per year will need to be built in the Borough against an actuality of 243 dwellings completed annually between 2013 and 2015. The JLP's OAN proposed level of housing growth will create severe and unsustainable problems for the rural parishes and, indeed, for the whole Borough, and should be reviewed and revised.</p> <p>The Steering Group would also request the Borough Council to address the issue of "fair share" to the rural parishes, as set out previously,</p>	The Council considers the evidence to be robust and NPPF compliant.

Reference	Consultee	Consultee Response	Consultee Comments	Officer Comments
			in the allocation of the projected housing growth in the OAN.	
SO17/229/1757	D2H	Not answered	<p>Scenarios A and B should be discounted as these will not be NPPF compliant. Scenarios C and D would require further development and refinement as the Evidence Base develops, and the proposed standard approach to defining Objectively Assessed Need becomes clear.</p> <p>Therefore, it is considered that it is not yet possible to provide comment on a possible preferred housing growth scenario.</p>	Comments are noted. The Council appreciates the requirements of the NPPF and aims to meet them. The Council will continue to assess new evidence of housing needs, such as the Government's standardised methodology for calculating housing needs, as it emerges. The benefits of Option D have to be considered against the potential negative impacts and the appropriate housing requirement will be assessed.
SO17/207/1759	Dean Lewis Estates	D	<p>We suggest that Housing Growth scenarios A and B are discounted forthwith as they are non NPPF compliant.</p> <p>Scenario C does not deliver economic growth in scale and aspiration (NPPF para 154) or an appropriate timescale. The delay from the Plan start of 2013 to adoption predicted in 2021 prompts the need for attractive housing choices and good quality homes to ensure deliverability.</p> <p>Scenario D is the most aligned to a Vision for growth. It is the minimum required, with further alignment based on the evolving Constellation Partnership growth agenda.</p>	<p>Support for option D is noted.</p> <p>There is not considered to be sufficient information available regarding the likely effects of some of the projects referred to. Furthermore, as any resulting effects might occur towards the end of the plan-period it is considered appropriate to account of their impact through the production of a future Local Plans.</p>
SO17/216/1760	Dr D Hodgkinson	D	Whilst our client strongly supports Growth Scenario D, should the Councils decide not to proceed with this option, and instead to run with Growth Scenario C, it is recommended that that housing option be pursued as a minimum level but with an additional uplift or windfall allowance of 10% to allow for any slippage or non-	<p>Support for option D is noted.</p> <p>There is not considered to be sufficient information available regarding the likely effects of some of the projects referred to. Furthermore, as any resulting effects might occur towards the end of the plan-period it is considered appropriate to account of</p>

Reference	Consultee	Consultee Response	Consultee Comments	Officer Comments
			<p>implementation of any large housing allocations. The Strategic Housing Land Availability Assessment (SHLAA) 2017 for Newcastle-under-Lyme acknowledges that the Council can only demonstrate a 1.8 year housing land supply (a significant under provision of the five year housing land supply requirements as set out in paragraph 47 of the Framework). Furthermore, Stoke-on-Trent City Council can also not demonstrate a five year housing land supply. Future SHLAAs could be produced to provide a comparison of the implementation rates set against the numbers of dwellings that had been granted permission; this would provide a mechanism for any additional uplift in windfall provision to be allowed during the plan period.</p> <p>Our client's sites in Talke and at Bar Hill, Madeley could make a material contribution to delivering Growth Scenario D.</p>	<p>their impact through the production of a future Local Plans.</p>
SO17/214/1762	Elmside Garden Centre	D	<p>Whilst our client strongly supports Growth Scenario D, should the Councils decide not to proceed with this option, and instead to run with Growth Scenario C, it is recommended that that housing option be pursued as a minimum level but with an additional uplift or windfall allowance of 10% to allow for any slippage or non-implementation of any large housing allocations. The Strategic Housing Land Availability Assessment (SHLAA) 2017 for Newcastle-under-Lyme acknowledges that the Council can only demonstrate a 1.8 year housing land supply (a significant under provision of the five year housing land supply requirements as set out in paragraph 47 of the Framework). Furthermore, Stoke-on-Trent City Council can also not demonstrate a five</p>	<p>Support for option D is noted.</p> <p>There is not considered to be sufficient information available regarding the likely effects of some of the projects referred to. Furthermore, as any resulting effects might occur towards the end of the plan-period it is considered appropriate to account of their impact through the production of a future Local Plans.</p>

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			<p>year housing land supply. Future SHLAAs could be produced to provide a comparison of the implementation rates set against the numbers of dwellings that had been granted permission; this would provide a mechanism for any additional uplift in windfall provision to be allowed during the plan period.</p> <p>Our client's sites at Elmside Garden Centre and Furnace Lane / Arbour Close in Madeley could contribute to delivering Growth Scenario D.</p>	
SO17/203/1764	G Colclough-Evans	D	<p>Option D is the single most option that would maximise and significantly uplift the economic potential of the plan area, Increase the number of jobs created over the plan period, increase the number of new homes built to help improve affordability levels to enable young people to access local housing, and provide and enhance infrastructure provision required to support future growth. And encourage new investment. It would best align itself to Para 154 of The Framework in its aspiration, and be that Scenario most equipped to maximise the economic growth potential of the JLP area, and to inject maximum positive outcome to the local housing market, its availability and affordability, and would finally, be best equipped to accommodate and take advantage of the intent, aspiration and potential arising from both HS2 and The Constellation Partnership.</p>	<p>Support for option D is noted.</p> <p>There is not considered to be sufficient information available regarding the likely effects of some of the projects referred to. Furthermore, as any resulting effects might occur towards the end of the plan-period it is considered appropriate to account of their impact through the production of a future Local Plans.</p>
SO17/204/1764	G Colclough-Evans	D	<p>Whilst our client strongly supports Growth Scenario D, should the Councils decide not to proceed with this option, and instead to run with Growth Scenario C, it is recommended that that housing option be pursued as a minimum level but</p>	<p>Support for option D noted.</p> <p>There is not considered to be sufficient information available regarding the likely effects of some of the projects referred to. Furthermore, as any resulting</p>

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			with an additional uplift or windfall allowance of 10% to allow for any slippage or non-implementation of any large housing allocations. The Strategic Housing Land Availability Assessment (SHLAA) 2017 for Newcastle-under-Lyme acknowledges that the Council can only demonstrate a 1.8 year housing land supply (a significant under provision of the five year housing land supply requirements as set out in paragraph 47 of the Framework). Furthermore, Stoke-on-Trent City Council can also not demonstrate a five year housing land supply. Future SHLAAs could be produced to provide a comparison of the implementation rates set against the numbers of dwellings that had been granted permission; this would provide a mechanism for any additional uplift in windfall provision to be allowed during the plan period.	effects might occur towards the end of the plan-period it is considered appropriate to account of their impact through the production of a future Local Plans.
SO17/195/1765	Maer Hills Protection Group	Don't know / unsure	The area has a rapidly growing elderly population. Young people appear to be leaving the area. We believe that the scenarios of job creation and consequent population growth are unrealistic. Therefore the large number of new houses suggested will simply not be needed	The inclusion of options for increased growth is in part an attempt to rebalance the area's demographic age range.
SO17/193/1766	Gary Dean Associates Ltd	C	Option C - It is consistent with the positive vision in the plan areas and seeks to deliver the full, objectively assessed need for new housing.	Support for option C is noted.
SO17/190/1767	Mark T Coupe	Don't know / unsure	This is a really difficult area of projection. What is most certainly true however is that any projection will be wrong. Aiming towards maximum growth is favoured.	Although 'don't know / unsure alternative option' has been selected the representation indicates a preference towards scenario D. The subsequent stages of the plan will have regard to 154 of the national policy framework with regards to being aspirational but also realistic.

Reference	Consultee	Consultee Response	Consultee Comments	Officer Comments
SO17/186/1768	WW Planning	Don't know / unsure	This is a really difficult area of projection. What is most certainly true however is that any projection will be wrong. Aiming towards maximum growth is favoured.	Although 'don't know / unsure alternative option' has been selected the representation indicates a preference towards scenario D. The subsequent stages of the plan will have regard to 154 of the national policy framework with regards to being aspirational but also realistic.
SO17/217/1769	Graham Heath Group	D	Whilst our client strongly supports Growth Scenario D, should the Councils decide not to proceed with this option, and instead to run with Growth Scenario C, it is recommended that that housing option be pursued as a minimum level but with an additional uplift or windfall allowance of 10% to allow for any slippage or non-implementation of any large housing allocations. The Strategic Housing Land Availability Assessment (SHLAA) 2017 for Newcastle-under-Lyme acknowledges that the Council can only demonstrate a 1.8 year housing land supply (a significant under provision of the five year housing land supply requirements as set out in paragraph 47 of the Framework). Furthermore, Stoke-on-Trent City Council can also not demonstrate a five year housing land supply. Future SHLAAs could be produced to provide a comparison of the implementation rates set against the numbers of dwellings that had been granted permission; this would provide a mechanism for any additional	Support for option D is noted. There is not considered to be sufficient information regarding the likely effects of some of the projects referred to. Furthermore, as any resulting effects might occur towards the end of the plan-period it is considered appropriate to account of their impact through the production of a future Local Plans.

Reference	Consultee	Consultee Response	Consultee Comments	Officer Comments
			<p>uplift in windfall provision to be allowed during the plan period.</p> <p>The provision of 55no. dwelling at our client's site at Shralebrook Road, Halmerend could significantly contribute to delivering Growth Scenario D.</p>	
SO17/187/1770	Glynn Edwards	Not answered	N/A	No preference or comment provided.
SO17/206/1772	Historic England	Not answered	<p>Where housing growth scenarios are referenced throughout the document, we are keen to understand what evidence base is being used to understand the impact to the significance of heritage assets, including their setting, in line with the National Planning Policy Framework (NPPF). We would expect to see an assessment for each proposed site, where an impact to a heritage asset, including its setting, may arise. This does not just include if there are heritage assets within the red boundary line of the proposed site.</p> <p>We note that Scenario A, B, C, D for housing do not consider the historic environment in either the opportunity or the challenges box and we would recommend that the Council considers what the opportunities and challenges for the historic environment may be.</p>	Noted. It is acknowledged that this will be an important part of the evidence base.
SO17/212/1773	Ian Dos Remedios	D	Whilst our client strongly supports Growth Scenario D, should the Councils decide not to proceed with this option, and instead to run with Growth Scenario C, it is recommended that that housing option be pursued as a minimum level but with an additional uplift or windfall allowance of	<p>Support for option D is noted.</p> <p>There is not considered to be sufficient information available regarding the likely effects of some of the projects referred to. Furthermore, as any resulting effects might occur towards the end of the plan-</p>

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			<p>10% to allow for any slippage or non-implementation of any large housing allocations. The Strategic Housing Land Availability Assessment (SHLAA) 2017 for Newcastle-under-Lyme acknowledges that the Council can only demonstrate a 1.8 year housing land supply (a significant under provision of the five year housing land supply requirements as set out in paragraph 47 of the Framework). Furthermore, Stoke-on-Trent City Council can also not demonstrate a five year housing land supply. Future SHLAAs could be produced to provide a comparison of the implementation rates set against the numbers of dwellings that had been granted permission; this would provide a mechanism for any additional uplift in windfall provision to be allowed during the plan period.</p> <p>Our clients site at Newcastle Road, Trent Vale could contribute to delivering Growth Scenario D.</p>	<p>period it is considered appropriate to account of their impact through the production of a future Local Plans.</p>
SO17/231/1774	Intu Properties plc	Not answered	<p>Paragraph 3.1 of the Joint Local Plan discusses the requirement for each local planning authority to establish a locally derived housing and employment target. Paragraph 23 of the NPPF (bullet point 6) requires local planning authorities to allocate a range of suitable sites to meet the scale and type of retail, leisure and residential development needs in town centres (along with other uses). Accordingly, the Joint Local Plan</p>	<p>Comments are noted. The Council appreciates the requirements of the NPPF and aims to meet them.</p>
SO17/213/1775	J A Knight (Coppice) Ltd	D	<p>Whilst our client strongly supports Growth Scenario D, should the Councils decide not to proceed with this option, and instead to run with Growth Scenario C, it is recommended that that housing option be pursued as a minimum level but with an additional uplift or windfall allowance of</p>	<p>Support for option D is noted.</p> <p>There is not considered to be sufficient information available regarding the likely effects of some of the projects referred to. Furthermore, as any resulting effects might occur towards the end of the plan-</p>

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			<p>10% to allow for any slippage or non-implementation of any large housing allocations. The Strategic Housing Land Availability Assessment (SHLAA) 2017 for Newcastle-under-Lyme acknowledges that the Council can only demonstrate a 1.8 year housing land supply (a significant under provision of the five year housing land supply requirements as set out in paragraph 47 of the Framework). Furthermore, Stoke-on-Trent City Council can also not demonstrate a five year housing land supply. Future SHLAAs could be produced to provide a comparison of the implementation rates set against the numbers of dwellings that had been granted permission; this would provide a mechanism for any additional uplift in windfall provision to be allowed during the plan period.</p> <p>Our client's site at Land at Haying Lane would contribute to delivering Growth Scenario D.</p>	<p>period it is considered appropriate to account of their impact through the production of a future Local Plans.</p>
SO17/194/1776	The Strategic Land Group	D	<p>Housing Growth Scenario D – Maximising our Economic Potential should be the preferred approach as it will improve affordability of housing in the quickest time and is the scenario most likely to have a marked impact on the economic potential of the two authority areas. Scenario D would also ensure the Vision for the Local Plan area is successful by attracting young people and families to the area through the provision of innovative and successful economies and attractive and well-designed new homes. However, the requirement should be quoted as a minimum.</p>	<p>Noted support for Option D.</p> <p>There is not considered to be sufficient information available regarding the likely effects of some of the projects referred to. Furthermore, as any resulting effects might occur towards the end of the plan-period it is considered appropriate to account of their impact through the production of a future Local Plans.</p>

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SO17/210/1777	John Sanders	D	<p>Whilst our client strongly supports Growth Scenario D, should the Councils decide not to proceed with this option, and instead to run with Growth Scenario C, it is recommended that that housing option be pursued as a minimum level but with an additional uplift or windfall allowance of 10% to allow for any slippage or non-implementation of any large housing allocations. The Strategic Housing Land Availability Assessment (SHLAA) 2017 for Newcastle-under-Lyme acknowledges that the Council can only demonstrate a 1.8 year housing land supply (a significant under provision of the five year housing land supply requirements as set out in paragraph 47 of the Framework). Furthermore, Stoke-on-Trent City Council can also not demonstrate a five year housing land supply. Future SHLAAs could be produced to provide a comparison of the implementation rates set against the numbers of dwellings that had been granted permission; this would provide a mechanism for any additional uplift in windfall provision to be allowed during the plan period.</p> <p>Our client's site could accommodate up to 50 dwelling which could significantly contribute to delivering Growth Scenario D.</p>	<p>Support for option D is noted.</p> <p>There is not considered to be sufficient information available regarding the likely effects of some of the projects referred to. Furthermore, as any resulting effects might occur towards the end of the plan-period it is considered appropriate to account of their impact through the production of a future Local Plans.</p>
SO17/220/1778	Keele Homes	D	<p>It is only through Growth Scenario D, which proposes to provide 36,280 new houses during the plan period, that the Housing Market Area can deliver in excess of the OAN that has been identified in the Strategic Housing Market Assessment (SHMA). In fact, paragraph 4.4 of the Options consultation acknowledges that the increase in population of 44,000 during the plan period under Scenario D would only result in a</p>	<p>Support for option D is noted.</p> <p>There is not considered to be sufficient information regarding the likely effects of some of the projects referred to. Furthermore, as any resulting effects might occur towards the end of the plan-period it is considered appropriate to account of their impact through the production of a future Local Plans.</p>

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			<p>'moderate' 13-14% increase in population, which is below the national averaged increase of 17%. If the Joint Local Plan is to be aspiring for higher growth in order to compete with neighbouring Cheshire East and Stafford Borough Councils (for example), then it should be aspiring to achieve growth that is commensurate with the national average. Only by delivering above the OAN level can the Councils hope to realistically achieve the economic objectives that have been set out in their six Strategic Aims as well as enable these areas to compete with the economic areas that are located in neighbouring authorities.</p> <p>Whilst our client strongly supports Growth Scenario D, should the Councils decide not to proceed with this option, and instead to run with Growth Scenario C, it is recommended that that housing option be pursued as a minimum level but with an additional uplift or windfall allowance of 10% to allow for any slippage or non-implementation of any large housing allocations. The Strategic Housing Land Availability Assessment (SHLAA) 2017 for Newcastle-under-Lyme acknowledges that the Council can only demonstrate a 1.8 year housing land supply (a significant under provision of the five year housing land supply requirements as set out in paragraph 47 of the Framework). Furthermore, Stoke-on-Trent City Council can also not demonstrate a five year housing land supply. Future SHLAAs could be produced to provide a comparison of the implementation rates set against the numbers of dwellings that had been granted permission; this would provide a mechanism for any additional uplift in windfall provision to be allowed during the</p>	

Reference	Consultee	Consultee Response	Consultee Comments	Officer Comments
			plan period.	
SO17/221/1779	Keele University	D	The growth and development of the University, which is aligned with Strategic Aim 1, envisages a very successful and vibrant local economy. A sustainable, deliverable and viable housing strategy, which supports such an economic profile, is therefore required and this points to scenario D.	Support for option D is noted. The growth aspirations of the university will be a consideration as the local plan progresses.
SO17/215/1780	Keith Eardley	D	<p>Whilst our client strongly supports Growth Scenario D, should the Councils decide not to proceed with this option, and instead to run with Growth Scenario C, it is recommended that that housing option be pursued as a minimum level but with an additional uplift or windfall allowance of 10% to allow for any slippage or non-implementation of any large housing allocations. The Strategic Housing Land Availability Assessment (SHLAA) 2017 for Newcastle-under-Lyme acknowledges that the Council can only demonstrate a 1.8 year housing land supply (a significant under provision of the five year housing land supply requirements as set out in paragraph 47 of the Framework). Furthermore, Stoke-on-Trent City Council can also not demonstrate a five year housing land supply. Future SHLAAs could be produced to provide a comparison of the implementation rates set against the numbers of dwellings that had been granted permission; this would provide a mechanism for any additional uplift in windfall provision to be allowed during the plan period.</p> <p>Our client's site at Audley Road, Waterhays,</p>	<p>Support for option D is noted.</p> <p>There is not considered to be sufficient information available regarding the likely effects of some of the projects referred to. Furthermore, as any resulting effects might occur towards the end of the plan-period it is considered appropriate to account of their impact through the production of a future Local Plans.</p>

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			Newcastle-under-Lyme could provide circa 12 dwellings which could contribute to delivering Growth Scenario D.	
SO17/192/1782	St Modwen Developments Ltd	D	Setting the bar in line with the OAN (scenario C) in a challenging market such as that evident in the JLP area is an invitation to fail. This would inevitably create circumstances where the associated requirement is treated as a target, rather than a minimum, with every chance that in practice delivery would fall short. Scenario D will enable growth sectors within the economy to be supported and promoted, and underpin a higher jobs target. A failure to meet the housing target in scenario D would be disappointing, but this would be in circumstances where delivery of at least the OAN would be much more likely to be achieved, and where full economic potential would be more closely realised.	Support for option D is noted.
SO17/222/1786	Mr and Mrs Rawlins	D	Whilst our client strongly supports Growth Scenario D, should the Councils decide not to proceed with this option, and instead to run with Growth Scenario C, it is recommended that that housing option be pursued as a minimum level but with an additional uplift or windfall allowance of 10% to allow for any slippage or non-implementation of any large housing allocations. The Strategic Housing Land Availability Assessment (SHLAA) 2017 for Newcastle-under-Lyme acknowledges that the Council can only demonstrate a 1.8 year housing land supply (a significant under provision of the five year housing land supply requirements as set out in paragraph 47 of the Framework). Furthermore, Stoke-on-Trent City Council can also not demonstrate a five	Support for option D is noted. There is not considered to be sufficient information available regarding the likely effects of some of the projects referred to. Furthermore, as any resulting effects might occur towards the end of the plan-period it is considered appropriate to account of their impact through the production of a future Local Plans.

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			<p>year housing land supply. Future SHLAAs could be produced to provide a comparison of the implementation rates set against the numbers of dwellings that had been granted permission; this would provide a mechanism for any additional uplift in windfall provision to be allowed during the plan period.</p> <p>Our client's land at Stone Road in Trentham/Hanford could make a material contribution to delivering Growth Scenario D."</p>	
SO17/227/1787	Mr C and Mrs S Taylor	D	<p>Whilst our client strongly supports Growth Scenario D, should the Councils decide not to proceed with this option, and instead to run with Growth Scenario C, it is recommended that that housing option be pursued as a minimum level but with an additional uplift or windfall allowance of 10% to allow for any slippage or non-implementation of any large housing allocations. The Strategic Housing Land Availability Assessment (SHLAA) 2017 for Newcastle-under-Lyme acknowledges that the Council can only demonstrate a 1.8 year housing land supply (a significant under provision of the five year housing land supply requirements as set out in paragraph 47 of the Framework). Furthermore, Stoke-on-Trent City Council can also not demonstrate a five year housing land supply. Future SHLAAs could be produced to provide a comparison of the implementation rates set against the numbers of dwellings that had been granted permission; this would provide a mechanism for any additional uplift in windfall provision to be allowed during the plan period.</p> <p>Our client's land at Heathcote Road and Victoria</p>	The support for Option D is noted. The Council will continue to assess new evidence of housing needs, such as the Government's standardised methodology for calculating housing needs, as it emerges. The benefits of Option D have to be considered against the potential negative impacts and the appropriate housing requirement will be assessed.

Reference	Consultee	Consultee Response	Consultee Comments	Officer Comments
			Avenue, Halmerend/Miles Green, Newcastle-under-Lyme could make a material contribution (up to over 200 dwellings subject to the extent of the sites that is allocated/developed) to delivering Growth Scenario D.	
SO17/228/1788	Mr and Mrs E Woodall	D	<p>Overall, we firmly believe that Scenario D should be progressed. Whilst higher than OAN, it would set an ambitious target to maximise opportunities for inward investment and economic growth within the joint plan area.</p> <p>Scenario D would certainly be consistent with the strategic Vision and the Aim of creating a UK Central Hub for Innovation and Investment. Setting a higher growth target would also provide the flexibility to take advantage of growth opportunities arising from HS2."</p>	The support for Option D is noted. The Council will continue to assess new evidence of housing needs, such as the Government's standardised methodology for calculating housing needs, as it emerges. The benefits of Option D have to be considered against the potential negative impacts and the appropriate housing requirement will be assessed.
SO17/200/1789	Chapel and Hill Chorlton, Maer and Aston and Whitmore Neighbourhood Development Plan	An alternative option	<p>The Steering Group feels that to help it to prepare its Neighbourhood Plan in strategic conformity with the emerging JLP the following issues need to be addressed by the Borough Council.</p> <ul style="list-style-type: none"> - The assumptions behind the JLP OAN calculations need to be made explicit, so as to enable our Neighbourhood Plan to comply with the JLP. - The JLP OAN is required to be a proper assessment of need, but as proposed it appears to address an aspirational level of growth. The Borough Council needs to demonstrate that its assessment is grounded in and supported by sound evidence. - The level of growth proposed in the JLP OAN is such that in order to achieve a 5 year supply of deliverable housing land sites would need to be allocated that are impossible to deliver, that are 	<p>Thank you for comments relating to the evidence base these will be taken into consideration.</p> <p>The SHMA presents an aspirational need for the plan area in order for the plan to accord with National policy, however the need also has to be realistic. Subsequent stages of the Joint Local Plan process will investigate this matter further along with the infrastructure requirements and sustainability implications of additional growth. Further evidence relating to viability and deliverability will be obtained as the plan progresses.</p>

Reference	Consultee	Consultee Response	Consultee Comments	Officer Comments
			<p>unsustainable and the development of which would cause immense harm to the rural communities.</p> <ul style="list-style-type: none"> - The Borough Council needs to demonstrate how our Neighbourhood Area's existing OAN will be incorporated into the JLP as a "fair share of local housing need". - Unlike Stoke-on-Trent, which is a unitary authority, Newcastle is a two-tier authority and as such is dependent on the County Council for provision of certain services (including subsidised services) and infrastructure. Therefore the Borough Council needs to establish what is Staffordshire County Council's position on the provision of services and infrastructure to accommodate the level of growth projected in the JLP OAN. 	
SO17/198/1791	North Planning Loggerheads	An alternative option	<p>The Parish Council feels that to help it to prepare its Neighbourhood Plan the following issues will need to be addressed and are for the Borough Council to explain.</p> <ul style="list-style-type: none"> • The assumptions behind the OAN calculations to enable our Neighbourhood Plan to comply with the JLP; • The OAN is required to be a proper assessment of need, but as proposed it appears to address an aspirational level of growth, which needs to be explained; • The level of growth proposed in the OAN means that to achieve a 5 year supply of deliverable housing land will require sites to be allocated, which will be impossible to deliver, are unsustainable and will cause immense harm to the rural communities; • Demonstrate how the Parishes' existing OANs 	<p>Comments relating to the evidence base of the Joint Local plan will be taken into consideration. The impacts of allocating land, which is sufficient to meet a need that is sufficiently aspirational to accord with National policy, in all locations will be a consideration for subsequent stages of the Joint Local Plan.</p>

Reference	Consultee	Consultee Response	Consultee Comments	Officer Comments
			will be incorporated into the Joint Local Plan as a "fair share of local housing need"; • Staffordshire County Council's position on the provision of services and infrastructure to accommodate the level of growth projected in the OAN	
SO17/189/1792	HCA	An alternative option	As the HCA we would wish to encourage evidence based additional levels of housing growth. This would need to tie in with the economic growth and regeneration agenda within Stoke/Newcastle.	Comments noted.
SO17/205/1793	Peter Brett Associates	C D	There is an increasingly urgent need to release land in Stoke in order to meet its very challenging identified housing targets. The level of deliverable housing land supply is nowhere near five years even when measured against the current Core Spatial Strategy targets, and the shortfall is set to heighten considerably.	Support for option C and D noted.
SO17/197/1795	Lands Improvements Holdings	C	LIH encourages the Councils to aim for an improved housing delivery target, as set out in Scenario D (providing circa 36,280 new homes). These scenarios are considered to more comprehensively align with the vision, aims and objectives of the plan in delivering more housing and supporting the economic growth potential of the plan area over the plan period. This also aligns with the aims set out in the NPPF to boost the supply of housing.	Support for option C noted, albeit with a preference towards aiming for scenario D.
SO17/202/1796	Richborough Estates	D	Planning for higher levels of economic growth would also inspire confidence in North Staffordshire as a place to invest, and would provide confidence and certainty that the area is open for business. Planning for an ambitious level of economic growth could also provide greater certainty that sites would be viable if developers	Support for option D is noted. There is not considered to be sufficient information available regarding the likely effects of some of the projects referred to. Furthermore, as any resulting effects might occur towards the end of the plan-period it is considered appropriate to account of

Reference	Consultee	Consultee Response	Consultee Comments	Officer Comments
			know that the dwellings and employment spaces they deliver will be sold or occupied for rent.	their impact through the production of a future Local Plans.
SO17/201/1798	Stoke-on-Trent City Council (Housing)	Not answered	Scenario C would ensure compliance with the NPPF. We recognise that there are challenges to delivering this; however the work of the Council across both teams can contribute significantly to this delivery and addressing challenges. It is our view that this should be the minimum growth option to not only increase the number of homes delivered but also to deliver the affordable housing needs of Stoke and improve access to housing.	Evidence regarding the potential delivery of difficult sites is welcomed. Further evidence regarding the delivery record of sites across the Plan area will no doubt be an important consideration as the Plan progresses. The city council is looking at itself as a facilitator of change. It is becoming more commercial in its outlook. Stoke on Trent has been approved as Housing Business Ready and has been granted Housing Zone status. An objective of the Council's housing strategy is to make new housing development viable so that a range of new homes are built that are attractive and affordable to people whatever stage of life they are at. We recognise that there has been a low ebb of house building in the City, however market conditions are improving and in 2014/15 the number of homes built was 65% higher than the previous 6 years. We recognise there are still challenges to delivery however the work of the teams is to work with developers and other interested parties to overcome these.
SO17/219/1799	SOT Regeneration Ltd and Mr Poole	D	Planning for higher levels of economic growth would also inspire confidence in North Staffordshire as a place to invest, and would provide confidence and certainty that the area is open for business. Planning for an ambitious level of economic growth could also provide greater certainty that sites would be viable if developers know that the dwellings and employment spaces	Support for option D is noted. There is not considered to be sufficient information regarding the likely effects of some of the projects referred to. Furthermore, as any resulting effects might occur towards the end of the plan-period it is considered appropriate to account of their impact through the production of a future Local Plans.

Reference	Consultee	Consultee Response	Consultee Comments	Officer Comments
			<p>they deliver will be sold or occupied for rent.</p> <p>Growth Scenario D (1814 dwellings per annum) is therefore supported, and it is considered that the plan should take this target forward and aim to meet this figure through appropriate site allocations and infrastructure delivery.</p>	
SO17/230/1800	St Modwen Developments Ltd, Stoke-on-Trent Regeneration Ltd and St Modwen Securities Ltd	D	Support for Option D.	Support for Option D is noted.
SO17/218/1801	Staffordshire County Council	Not answered	<p>Whilst the OAN seems to be an ambitious level of housing delivery given past performance, we do have some concerns that the OAN does not go far enough in terms of considering a 'policy-on' approach as outlined in the various economic strategies referenced within the document. This is an issue we consider further in our response to the question related to economic growth scenarios.</p> <p>We would therefore suggest considering an approach where allocations are made to support the delivery of the OAN as a minimum, but additional allocations are safeguarded that can come forward if indeed the various economic strategies are successful and additional housing and employment land is required within the plan period. Such an approach could also act as a buffer to be able to address issues related to the non-delivery of sites and the five-year supply requirement.</p>	<p>No specific preference has been indicated.</p> <p>There is not considered to be sufficient information regarding the likely effects of some of the projects referred to. Furthermore, as any resulting effects might occur towards the end of the plan-period it is considered appropriate to account of their impact through the production of a future Local Plans.</p>

Reference	Consultee	Consultee Response	Consultee Comments	Officer Comments
SO17/209/1802	Stephen Beaumont	D	<p>Whilst our client strongly supports Growth Scenario D, should the Councils decide not to proceed with this option, and instead to run with Growth Scenario C, it is recommended that that housing option be pursued as a minimum level but with an additional uplift or windfall allowance of 10% to allow for any slippage or non-implementation of any large housing allocations. The Strategic Housing Land Availability Assessment (SHLAA) 2017 for Newcastle-under-Lyme acknowledges that the Council can only demonstrate a 1.8 year housing land supply (a significant under provision of the five year housing land supply requirements as set out in paragraph 47 of the Framework). Furthermore, Stoke-on-Trent City Council can also not demonstrate a five year housing land supply. Future SHLAAs could be produced to provide a comparison of the implementation rates set against the numbers of dwellings that had been granted permission; this would provide a mechanism for any additional uplift in windfall provision to be allowed during the plan period.</p> <p>Our client owns land at Pittsburgh House, Lightwood Road, Stoke-on-Trent which could accommodate circa 25 dwellings should the site be removed from the Green Belt and this could contribute to delivering Growth Scenario D.</p>	<p>Support for option D noted.</p> <p>There is not considered to be sufficient information available regarding the likely effects of some of the projects referred to. Furthermore, as any resulting effects might occur towards the end of the plan-period it is considered appropriate to account of their impact through the production of a future Local Plans.</p>
SO17/191/1805	Lichfields	Don't know / unsure	The Joint Local needs to set out policies for the management and growth of centres over the plan period, so that the need for retail, leisure and residential development are met in full over the plan period.	Comments noted. The situation regarding other aspects of land use planning will feature once the quantum of growth and its spatial distribution is understood. Once established, this will provide a baseline from which to assess the needs of other uses and inform the production of Local Plan policies, including those for the growth of centres.

Reference	Consultee	Consultee Response	Consultee Comments	Officer Comments
SO17/226/1808	Urban Vision North Staffordshire	Not answered	<p>Scenarios A and B should be discounted as these will not be NPPF compliant. Scenarios C and D would require further development and refinement as the Evidence Base develops, and the proposed standard approach to defining Objectively Assessed Need becomes clear.</p> <p>Therefore, it is considered that it is not yet possible to provide comment on a possible preferred housing growth scenario.</p>	Any shortfall represents unmet housing need. This should be calculated from the start of the plan period. Any unmet need before that time is called backlog and should be calculated on the same basis. However, the up to date housing requirement paper or SHMA should properly take account of backlog as part of the calculation of OAN, and is therefore already factored in up to the point that the figures used run from. The projections effectively start from scratch and so give a new and up to date full assessment of need.
SO17/394/1809	Gladman Developments	D	<p>The NPPF requires the plan to meet the OAN in full subject to consistency with the policies set out in the NPPF. Neither Scenario A nor B meet the OAN in full and should therefore be discounted.</p> <p>Scenario C would meet the current OAN and therefore has some merit. Scenario D would represent a housing provision in excess of the current OAN and therefore would be more fully in accordance with the NPPF aspiration for a significant boost in housing development and would very much accord with the Government's objectives as set out in the White Paper. Although there are potential issues with this scale of development in terms of environmental impact, the key will lie in those policy choices regarding the location of new housing growth.</p>	Support for options C or D is noted. As the governments standardised methodology is finalised, the plan will incorporate this.
SO17/391/1812	Graham and Sylvia Rowe	B	Do not wish new development to extend significantly beyond that required to support natural population growth.	Support for option B is noted.

Reference	Consultee	Consultee Response	Consultee Comments	Officer Comments
SO17/389/1814	Mrs M.A. Wareham	A	Support for Option A.	Support for Option A is noted.
SO17/384/1815	Carl Edwards	D	<p>It is only through Growth Scenario D, which proposes to provide 36,280 new houses during the plan period, that the Housing Market Area can deliver in excess of the OAN that has been identified in the Strategic Housing Market Assessment (SHMA). In fact, paragraph 4.4 of the Options consultation acknowledges that the increase in population of 44,000 during the plan period under Scenario D would only result in a 'moderate' 13-14% increase in population, which is below the national averaged increase of 17%. If the Joint Local Plan is to be aspiring for higher growth in order to compete with neighbouring Cheshire East and Stafford Borough Councils (for example), then it should be aspiring to achieve growth that is commensurate with the national average. Only by delivering above the OAN level can the Councils hope to realistically achieve the economic objectives that have been set out in their six Strategic Aims as well as enable these areas to compete with the economic areas that are located in neighbouring authorities.</p> <p>Whilst our client strongly supports Growth Scenario D, should the Councils decide not to proceed with this option, and instead to run with Growth Scenario C, it is recommended that that housing option be pursued as a minimum level but with an additional uplift or windfall allowance of 10% to allow for any slippage or non-implementation of any large housing allocations. The Strategic Housing Land Availability</p>	The support for Option D is noted. The Council will continue to assess new evidence of housing needs, such as the Government's standardised methodology for calculating housing needs, as it emerges. The benefits of Option D have to be considered against the potential negative impacts and the appropriate housing requirement will be assessed.

Reference	Consultee	Consultee Response	Consultee Comments	Officer Comments
			Assessment (SHLAA) 2017 for Newcastle-under-Lyme acknowledges that the Council can only demonstrate a 1.8 year housing land supply (a significant under provision of the five year housing land supply requirements as set out in paragraph 47 of the Framework). Furthermore, Stoke-on-Trent City Council can also not demonstrate a five year housing land supply. Future SHLAAs could be produced to provide a comparison of the implementation rates set against the numbers of dwellings that had been granted permission; this would provide a mechanism for any additional uplift in windfall provision to be allowed during the plan period.	
SO17/392/1816	Mrs S Y Cornes	B C An alternative option	I do support B and C options above, but feel strongly that the first effort should be to clear up the inner city of SOT, plenty of brownfield sites to provide housing for workers in the area, and badly needed. We, who choose to live in rural villages in the green belt do so to keep out of "the hub". We have very little public transport , no leisure facilities, small individual shops, narrow lanes which would all be ruined by the housing planning I have seen.	The Joint Local Plan will look to allocate a range of sites that both regenerates the area as well as delivering the housing need over the plan area as a whole. The plan will be accompanied by an Infrastructure Delivery Plan (IDP) that will ensure needed infrastructure is delivered in an appropriate timely manner.
SO17/393/1817	Pat Lee	D	Support for Option D.	Support for Option D is noted.
SO17/385/1819	Muller Property Group	D	Of the four housing growth scenarios, Scenario D is clearly the most appropriate option. It should, however, be noted that the quantum of houses allocated for development by the emerging Plan will need to exceed the preferred housing growth option in any event.	The support for Option D is noted. The Council will continue to assess new evidence of housing needs, such as the Government's standardised methodology for calculating housing needs, as it emerges. The benefits of Option D have to be considered against the potential negative impacts and the appropriate housing requirement will be

Reference	Consultee	Consultee Response	Consultee Comments	Officer Comments
			<p>Not all housing allocations within Local Plans deliver as expected. Local Plans are designed to allocate land for housing delivery over a minimum of a 15 year period. It is clearly difficult to predict exactly how sites will deliver during the course of this plan period. There may be unforeseen obstacles with the delivery of the sites that are not known at the time of the Plan preparation process. Furthermore, it may well be the case that densities are overestimated due to unknown site constraints or delivery timescales extend due to changes in circumstances. It is, therefore, necessary for Local Plans to over allocate to take account of the fact that not all housing sites will deliver. The amount of over allocation required is dependent upon a range of different circumstances. In the case of Stoke-on-Trent and Newcastle-under-Lyme there are clear areas of uncertainty regarding the brownfield sites that could come forward for development. For example, a number of these sites could have difficulties with substantial remediation costs and potentially poor land values. As a consequence, the delivery of these sites could be stalled or, in some cases, prevented altogether. We are, therefore, of a view that it is necessary to over allocate by 20% i.e. the capacity of the total housing allocations should exceed the housing requirement by 20%. The 20% buffer will help ensure a constant supply of housing delivery and that the overall housing requirement is met during the course of the plan period. This approach is best practiced and followed by a number of other local authorities including the neighbouring authority of Cheshire East.</p>	assessed.

Reference	Consultee	Consultee Response	Consultee Comments	Officer Comments
SO17/386/1821	Sam Loweth	B	Support for Option B.	Support for Option B is noted.
SO17/387/1822	Thistleberry Residents Association	Not answered	There are issues over empty homes, affordable home, regeneration and the housing market.	The Council's will continue to update evidence throughout the plan period. With regards to housing needs and population change, this is covered within the SHMA. To deliver these the Joint Local Plan will look to allocate a range of sites that both regenerates the area as well as delivering the housing need.
SO17/390/1823	Whitmore Parish Council	An alternative option	The parish council firmly believes that this approach is both absurd and inexcusable folly. The BC should immediately now recognise that it is completely out of its depth and tell central government that this level of development is totally unrealistic and unachievable. It should challenge central government to either send in a team to show how to do it or agree a reduced more realistic target.	The Governments guidance and policy is clear that Local Plans should significantly boost housing supply and ensure that the Local Plan meets the Objectively Assessed Needs in full. Without this it is highly unlikely that the Local Plan would be found sound.
SO17/551/1824	Neale Sheldon	Don't know / unsure	Totally disagree with building in countryside areas such as Baldwins Gate, because villages such as this do not have the capacity in the local primary school in particular. There are plenty of old brownfield sites near the city that could be developed	The Joint Local Plan will look to allocate a range of sites that both regenerates the area as well as delivering the housing need over the plan area as a whole. The plan will be accompanied by an Infrastructure Delivery Plan (IDP) that will ensure needed infrastructure is delivered in an appropriate timely manner.
SO17/552/1825	Stephanie Evans	D	Option D - There is not enough new housing in the areas of Newcastle-under-Lyme/Clayton and therefore you need to build on greenbelt. When you go into South Cheshire there is a lot of new housing development and I feel Newcastle-under-Lyme is losing out on families going to this area rather than stay in the Newcastle-under-Lyme area.	Support for Option D is noted.

Reference	Consultee	Consultee Response	Consultee Comments	Officer Comments
SO17/553/1826	Steven Malam	An alternative option	N/A	N/A
SO17/554/1827	Theatres Trust	Don't know / unsure	N/A	N/A
SO17/555/1828	Jill Freeman	An alternative option	The NPPF states that Local Plans should look to meet their needs for housing, business and other's needs.	The NPPF states that Local Plans should look to meet their needs for housing, business and other's needs.
SO17/556/1829	Michael Hall	Don't know / unsure	N/A	N/A
SO17/557/1830	The Connecting Tracks Project	D	Maxim build housing allows for a broader range of housing types and therefore a wider level of skills from householders I support housing development at transport hubs also.	Support for option D is noted. The Green Belt Assessment will look at the performance of the Green Belt against its functions in the NPPF and if there is a requirement to go into the Green Belt, help to select the most appropriate sites.
SO17/558/1831	Andrew Wickens	C	I would hope that young people can find affordable local housing and that we can increase graduate retention with innovative and creative businesses. I'm conscious this aspirational on my part rather than evidence based.	Support for option C is noted. With regards to HS2, as further evidence emerges, this will be incorporated into the plan.
SO17/559/1832	Richard Nicholl	B	We should consider taller buildings to maximise the use of the current available space before even considering and green belt areas. This applies both to industrial units and to housing. Doubling the space available by using just twice the height would halve the amount of land required. Every area of brownfield sites and redundant	The Joint Local Plan will look to allocate a range of sites that both regenerates the area as well as delivering the housing need. With regards to design, policies contained within the Local Plan will look to ensure that this is appropriate for the areas and that quality housing is delivered. The SHLAA looks at densities delivered within the character areas and applies these assumptions to

Reference	Consultee	Consultee Response	Consultee Comments	Officer Comments
			buildings in the city and town centres must be maximised before any further use of green belt land is even considered. Brown belt land can be re-used, green belt land can never be restored.	the sites. The market will have some input into this, as the housing that is built will still have to be attractive to the buyer.
SO17/560/1833	Donald Butterworth	C D	<p>Suggest a combination of C. & D. as economic growth supports everything else.</p> <p>The area needs to be able to attract sustainable employment and have sufficient numbers of people who can be educated to a good standard with opportunities for further education and vocational training to fulfil the jobs in the area from an expanding economy. The document makes statements of New Houses required each year but does not provide sufficient detail to support these numbers and this information should be made available for public and professional scrutiny.</p>	The SHMA gives detailed evidence of how the housing need numbers have been derived.
SO17/561/1834	Paul Baddeley	C	Option C - Need for newer homes throughout the urban area, overall need for smaller unit homes and for larger and high quality homes.	Support for Option C is noted. Details around house type and size will emerge in later stages of the plan preparation.
SO17/562/1835	Loggerheads Parish Council	C	The principle of C makes sense as otherwise will all be commuters out to thriving economic centres...but the document does not provide sufficient detail on calculations and assumptions made to evidence where the figures have come from so without this it is difficult to comment on actual figures proposed.	Support for option C is noted. As the Local Plan moves through the preparation process towards adoption, further details and evidence will emerge.
SO17/563/1836	Adri Hartveld	An alternative option	Focus on reducing the environmental costs and optimizing access, therefore there should only be housing and industrial development in the city and close to town centres and accessible locations in urban areas, excluding Green Belt.	The Joint Local Plan will look to allocate a range of sites that both regenerates the area as well as delivering the housing need.

Reference	Consultee	Consultee Response	Consultee Comments	Officer Comments
SO17/564/1837	Karl Deakes	B	Option B	Support for Option B is noted.
SO17/565/1838	Catherine Salt	C D	D - If enough employers can be encouraged into the area or enough commuters from Manchester/Birmingham attracted. If they can't then option C.	Support for Options C and D are noted.
SO17/566/1839	Mr and Mrs Phillips	Not answered	Any housing proposals need to address the facilities available including schools, health, jobs and transport. Also, to respect the characteristics of the area, this would include agriculture and green belt. There appears to be great concern locally concerning the options which include agricultural land and green belt. These options, in our view, should not feature in the plan whilst there are so many undeveloped brownfield sites, which in many cases have been undeveloped for long periods of time and are eyesores in the joint area.	The Joint Local Plan will look to allocate a range of sites that both regenerates the area as well as delivering the housing need. Furthermore the Local Plan will be accompanied by an Infrastructure Delivery Plan (IDP) which will ensure the appropriate and timely delivery of infrastructure.
SO17/567/1840	Carlton Woolley	B	It should be written into every option that building on Brown field sites should be promoted above building on Green belt at all opportunities	The Joint Local Plan will look to allocate a range of sites that both regenerates the area as well as delivering the housing need.
SO17/568/1841	Natural England	Don't know / unsure	Natural England does not have a particular preference for the housing growth scenarios that have been set out but would wish to ensure that the chosen approach results in no adverse impact on any designated nature conservation sites or protected landscapes.	Comments are noted.
SO17/569/1842	Jacqueline Karen Reynolds	A	The local community are showing great concern on the options which have been voiced by Stoke on Trent and Newcastle Councils. To include agriculture and green belt in these options in our opinion should not feature in the plans. We need	The Joint Local Plan will look to allocate a range of sites that both regenerates the area as well as delivering the housing need.

Reference	Consultee	Consultee Response	Consultee Comments	Officer Comments
			to be protecting these precious areas for future generations. There are so many brown field sites plus derelict land and buildings which developed would improve the image of Stoke on Trent and Newcastle. More often than not it gives the wrong impression to visitors and does not help the communities living in these areas pride and ambitions to do better.	
SO17/570/1843	Lynne Woolley	An alternative option	The easy option taken by most privately owned housing developers is to build on new land which basically means green belt. These are usually 4 & 5 bedroom house built on the out skirts of the city. As such they are of no use to young first time buyers, ideal to fuel the regeneration of the inner cities. By building in rural villages and the outskirts of the city e.g. Audley where major development is being put forward, and where public transport is less that useless, this only acts to expand the use of private motor vehicles, thus harming the very environment that the plan is designed to enhance. building on inner city brown field sites, will expand the use of public transport	The Joint Local Plan will look to allocate a range of sites that both regenerates the area as well as delivering the housing need.
SO17/571/1844	John Lamont	B	There is no guarantee that the target for economic growth will be achieved especially with the HS2 hub now being in Cheshire. If economic development takes place infrastructure including housing will surely follow.	Support for option B is noted. The Joint Local Plan will be supported by economic strategies and work from the SEP to help facilitate economic growth.
SO17/572/1845	Janet Lamont	B	Need to provide housing for population as well as certain amount of economic growth to provide jobs and future employment but not at the expense of large scale development in the countryside.	Support for option B is noted.
SO17/573/1846	Sport England	Not answered	In terms of housing growth scenarios Sport England does not take a strong view. Our main priority will be to ensure housing growth is	Aim 2 of the Joint Local Plan is to support Healthy and Active Communities. The Local Plan will be supported by evidence in the forms of Playing

Reference	Consultee	Consultee Response	Consultee Comments	Officer Comments
			sustainable and is supported by adequate indoor and outdoor sports facilities (built, open/green infrastructure etc.) to ensure there are appropriate opportunities for physical activity to deliver the vision for healthy active communities.	Pitch strategies and green/open space strategies. Furthermore the plan will also be accompanied by an infrastructure delivery plan to ensure supporting infrastructure is delivered in an appropriate and timely manner.
SO17/574/1847	M Davies	B	Option B	Support for option B is noted.
SO17/575/1848	Staffordshire Chambers of Commerce	D	Support for option D. Staffordshire Chambers does not agree that an option to 'meet the OAN' should be an option; this should be a prerequisite / starting point. The Council should not adopt a figure that is lower than the OAN for the plan area (hence ruling out Options A and B). Such an approach would be contrary to the NPPF and would fail to meet the housing needs for both Stoke-on-Trent and Newcastle-under-Lyme and would not be positively prepared. The Council should look to boost significantly the supply of housing, which would be in line with paragraph 47 of the NPPF. We will be saying that going beyond the OAN would provide the means to do this, and we will be requesting that the JLP promote Option D (Maximising Economic Potential) - 32,180 jobs 258ha of land) & 36,280 dwellings (1,814dpa). In planning terms, this is referred to as a 'policy on' target, i.e. putting in place policies that seek to secure a greater level of growth than the OAN.	Support for option D is noted.
SO17/576/1849	Keele Parish Council and Neighbourhood Plan	C	Support for option C. This is supported by a local housing needs survey. There are further concerns about infrastructure.	Support for option C is noted. The policies contained within the Joint Local Plan will ensure that any detrimental impact of development is mitigated.

Reference	Consultee	Consultee Response	Consultee Comments	Officer Comments
SO17/577/1850	Peter Jones	A	Option A	Support for option A is noted.
SO17/578/1851	Angela Clarke	Don't know / unsure	Don't know / unsure Alternative option	N/A
SO17/579/1853	Packmoor Residents Association	D	<p>But you need the economic growth first, not the 'if we build it they will come' scenario. They won't. Currently the ST postcode is toxic and needs its profile to be raised by higher end employment first. By all means PLAN the housing, just enable the sites then purpose build for the increased employability prospects, not the other way round. The latter course spells disaster.</p> <p>Currently, post Brexit, there is a lot of interest in investment in the area. The current initiatives EAZ, Keele deal etc are all separate with their own agendas. There needs to be more cooperation and more of a cooperative approach to investment. All partners are still being very parochial in their attitude and outlook and they need to work together for the advancement of the REGION as a whole, not the individual plan areas. Historic nervousness between partners must now be buried for the local plant to work for the 21st century and we need to think collectively for a combined future in investment, innovation and construction otherwise it will be a disaster for the region and we will continue to be regarded as a 'basket case' by central government and therefore becoming a sink city for the country is all we deserve. We can prevent this right here, right now with an effective local plan.</p>	The Local Plan will be supported by Local Economic Plans and the work of the SEP to help facilitate any additional growth. Delivery of dwellings will be phased across the plan period.

Reference	Consultee	Consultee Response	Consultee Comments	Officer Comments
SO17/580/1854	Wenslie Naylor	C	Option C - To support and promote cultural and sporting provision of the JLP area, namely by identifying, securing and marketing a large well designed covered arena with ancillary workshops, practice areas. To be centrally located in the urban area and served by good public transport. To be of a standard consistent with attracting audience and participation from a wider regional area. To develop in conjunction with academic institutions' needs reference performance arts, arts in general and sports studies.	Support for option C is noted. The Joint Local Plan will also contain policies for a wide range of issues with these will be based around the aims, which include, improving our centres as well as healthy and active communities.
SO17/581/1855	Stephen Peake	A	Option A	Support for option A is noted.
SO17/582/1856	Sue Sandywell	B	Option B	Support for option B is noted.
SO17/583/1857	Jennifer Cook	Don't know / unsure		N/A
SO17/584/1858	Kidsgrove Independents	B	Option B	Support for option B is noted.
SO17/585/1859	Audley Rural Parish Council	C	Option C is realistically based on an objective assessment of need.	Support for option C is noted.
SO17/586/1860	Alderman David Becket	C	Option C, combined with the same option for employment growth offers some growth but also sustainability.	Support for option C is noted.

Reference	Consultee	Consultee Response	Consultee Comments	Officer Comments
SO17/587/1861	Alan Kinnersley	B	Option B - Cheshire East Council has already started a house building programme within easy travelling distance of Newcastle & Stoke.	Support for option B is noted. Cheshire East is considered to be in a separate Housing Market Area.
SO17/588/1862	Newcastle under Lyme Liberal Democrats	C	Option C - This will meet the objective assessed needs for employment and ensures that we grow in order to catch up with the rest of the country in terms of opportunities and income for the people of the Borough.	Support for option C is noted.
SO17/589/1863	Janet Burgess	Don't know / unsure	Don't know / unsure Alternative option - How many vacant properties are there currently. Why does it take so long to re let empty properties?	It is considered that the local housing market is buoyant at the moment. Would be keen to see the evidence behind this before being able to fully comment.
SO17/590/1864	Ms Finney	An alternative option		N/A
SO17/591/1865	Glenis Woodcock	A	Option A - The population of Kidsgrove won't grow so you won't get money from here we don't want houses as you fill them with drug dealers and ex-cons so we're fine we got enough.	Support for option A is noted.
SO17/592/1866	Madeley Parish Council and Neighbourhood Plan Steering Group	C	Option C	Support for option C is noted
SO17/593/1867	Ray Williams	A	Option A	Support for option A is noted.
SO17/594/1868	FUCHS Lubricants (UK) plc	D	Option D - This is an opportunity for both Councils to make a real change to the area and not formulating a plan to maximise economic potential would appear to represent a missed opportunity.	The support for option D is noted.

Reference	Consultee	Consultee Response	Consultee Comments	Officer Comments
SO17/595/1869	Gwyn Griffiths	An alternative option	Difficult to comment as the background evidence is unclear. Somewhere between B and C would appear appropriate. Every Local Authority seems to aspire to above-average growth, which is mathematically impossible!	The comments are noted, however the Government is clear within the NPPF that it wishes to significantly boost housing delivery. Also there are clear reasons within the document why the growth is considered appropriate for the area.
SO17/596/1870	Stafford Borough Council	C	In terms of the four Housing Growth scenarios, the Borough Council notes that Scenario C – Supporting Economic Growth (OAN) would provide the level of additional housing in order to support Employment Growth Scenario C – Meeting our Economic Projections (OAN). However these growth scenarios will require a significant net inflow of new residents each year, as the existing labour force is insufficient to provide for future growth, which could impact on adjacent areas.	The comments are noted, the joint SHMA looks at population projections, taking account of migration and demographic change to come up with the OAN number.
SO17/550/1872	Cynthia England	B	Option B - Providing housing for local people, so that they can remain in the area, & be part of the economic development	Support for option B is noted. However to support economic development, higher numbers may be required.
SO17/744/1873	Araripe Limited	D	<p>We firmly believe that Scenario D should be progressed. Whilst higher than OAN, it would set an ambitious target to maximise opportunities for inward investment and economic growth within the joint plan area.</p> <p>Scenario D would certainly be consistent with the strategic Vision and the Aim of creating a UK Central Hub for Innovation and Investment. Setting a higher growth target would also provide the flexibility to take advantage of growth opportunities arising from HS2.</p>	The NPPF states that we should look to significantly boost housing delivery and that targets should be realistic and deliverable. Therefore when deciding the preferred housing target, the Council's will need to assess the broad range of evidence.

Question 4: Economic growth scenarios

The Consultation Document identifies 4 possible scenarios for economic growth. Which of the economic growth scenarios do you prefer?

- A: Carry forward the existing Core Spatial Strategy employment land targets
- B: Supporting our existing population growth
- C: Meet our economic projections
- D: Maximising our economic potential
- Don't know / unsure
- An alternative option

Reference	Consultee	Consultee Response	Consultee Comments	Officer Comments
SO17/35/1729	Gary Picken	C	I would like to see the local plan to have an environmental improvement counterbalance with any non-brownfield usage being compensated by the creation of new public greenfield spaces from former brownfield sites - also I'm not convinced the option c or d space requirement takes account repurposing or change of use of existing business accommodation in smaller floor area spaces whilst delivering the same growth in jobs via changes in technology and space use. I'm not convinced the option c or d space requirement analysis prepared by Stoke on Trent consultants appropriately takes account of re-purposing or change of use of existing business accommodation in smaller floor area spaces allowing either business employment growth or say conversion of former office spaces into residential flats in town centres and suburbs. This needs to be addressed in any development of the preferred local plan option.	Comments noted. The Employment Land Review (2015) considers changes in workplace technology and the implications for smaller floorspace in determining the projections for employment land growth. The HCA employment densities guide is the basis for that calculation, which is a widely accepted source of data. This will be considered further to inform the preparation of the preferred option, alongside wider environmental improvements as part of the work to prepare the policy approaches to be applied in the draft local plan.
SO17/37/1730	B Isaac, G Downs and J Talbot	D	Growth Scenario C does not assist inward migration and that any Growth Scenario other than D would be a significant barrier to achieving sustainable development.	Support for Growth Scenario D is noted. Growth Scenario C is based on the Cambridge Economic forecasts (which also informed the Strategic Economic Plan) and one of the reasons why this scenario is recommended as the objectively assessed need is because it does help to reduce

Reference	Consultee	Consultee Response	Consultee Comments	Officer Comments
				out-migration through increased in-migration. The figures relating to the employment land supply and identified shortfalls are from the Employment Land Review (2015). These figures have now been updated by both councils, as set out in the Employment Technical Paper, and so the figures quoted can be considered to be out of date.
SO17/39/1731	Mr G Adams	D	Growth Scenario C does not assist inward migration and any Growth Scenario other than D would be a significant barrier to achieving sustainable development.	Support for Growth Scenario D is noted. Growth Scenario C is based on the Cambridge Economic forecasts (which also informed the Strategic Economic Plan) and one of the reasons why this scenario is recommended as the objectively assessed need is because it does help to reduce out-migration through increased in-migration. The figures relating to the employment land supply and identified shortfalls are from the Employment Land Review (2015). These figures have now been updated by both councils, as set out in the Employment Technical Paper, and so the figures quoted can be considered to be out of date.
SO17/36/1732	Ian Jefferies	D	Growth Scenario C does not assist inward migration and any Growth Scenario other than D would be a significant barrier to achieving sustainable development.	Support for Growth Scenario D is noted. Growth Scenario C is based on the Cambridge Economic forecasts (which also informed the Strategic Economic Plan) and one of the reasons why this scenario is recommended as the objectively assessed need is because it does help to reduce out-migration through increased in-migration. The figures relating to the employment land supply and identified shortfalls are from the Employment Land Review (2015). These figures have now been updated by both councils, as set out in the Employment Technical Paper, and so the figures quoted can be considered to be out of date.

Reference	Consultee	Consultee Response	Consultee Comments	Officer Comments
SO17/38/1733	J, R and M Hollins	D	Growth Scenario C does not assist inward migration and any Growth Scenario other than D would be a significant barrier to achieving sustainable development.	Support for Growth Scenario D is noted. Growth Scenario C is based on the Cambridge Economic forecasts (which also informed the Strategic Economic Plan) and one of the reasons why this scenario is recommended as the objectively assessed need is because it does help to reduce out-migration through increased in-migration. The figures relating to the employment land supply and identified shortfalls are from the Employment Land Review (2015). These figures have now been updated by both councils, as set out in the Employment Technical Paper, and so the figures quoted can be considered to be out of date.
SO17/34/1734	Julie Everst Young	D	Growth Scenario C does not assist inward migration and any Growth Scenario other than D would be a significant barrier to achieving sustainable development.	Support for Growth Scenario D is noted. Growth Scenario C is based on the Cambridge Economic forecasts (which also informed the Strategic Economic Plan) and one of the reasons why this scenario is recommended as the objectively assessed need is because it does help to reduce out-migration through increased in-migration. The figures relating to the employment land supply and identified shortfalls are from the Employment Land Review (2015). These figures have now been updated by both councils, as set out in the Employment Technical Paper, and so the figures quoted can be considered to be out of date.
SO17/41/1735	Mazar Hussain	D	Growth Scenario C does not assist inward migration and any Growth Scenario other than D would be a significant barrier to achieving sustainable development.	Support for Growth Scenario D is noted. Growth Scenario C is based on the Cambridge Economic forecasts (which also informed the Strategic Economic Plan) and one of the reasons why this scenario is recommended as the objectively assessed need is because it does help to reduce out-migration through increased in-migration. The figures relating to the employment land supply and identified shortfalls are from the Employment Land

Reference	Consultee	Consultee Response	Consultee Comments	Officer Comments
				Review (2015). These figures have now been updated by both councils, as set out in the Employment Technical Paper, and so the figures quoted can be considered to be out of date.
SO17/33/1736	P Marson, J Marson and A Manning	D	Growth Scenario C does not assist inward migration and any Growth Scenario other than D would be a significant barrier to achieving sustainable development.	Support for Growth Scenario D is noted. Growth Scenario C is based on the Cambridge Economic forecasts (which also informed the Strategic Economic Plan) and one of the reasons why this scenario is recommended as the objectively assessed need is because it does help to reduce out-migration through increased in-migration. The figures relating to the employment land supply and identified shortfalls are from the Employment Land Review (2015). These figures have now been updated by both councils, as set out in the Employment Technical Paper, and so the figures quoted can be considered to be out of date.
SO17/32/1737	Smartbuild & Design Limited	D	Growth Scenario C does not assist inward migration and any Growth Scenario other than D would be a significant barrier to achieving sustainable development.	Support for Growth Scenario D is noted. Growth Scenario C is based on the Cambridge Economic forecasts (which also informed the Strategic Economic Plan) and one of the reasons why this scenario is recommended as the objectively assessed need is because it does help to reduce out-migration through increased in-migration. The figures relating to the employment land supply and identified shortfalls are from the Employment Land Review (2015). These figures have now been updated by both councils, as set out in the Employment Technical Paper, and so the figures quoted can be considered to be out of date.
SO17/40/1738	TFK Property Limited	D	Growth Scenario C does not assist inward migration and any Growth Scenario other than D would be a significant barrier to achieving sustainable development.	Support for Growth Scenario D is noted. Growth Scenario C is based on the Cambridge Economic forecasts (which also informed the Strategic Economic Plan) and one of the reasons why this scenario is recommended as the objectively

Reference	Consultee	Consultee Response	Consultee Comments	Officer Comments
				assessed need is because it does help to reduce out-migration through increased in-migration. The figures relating to the employment land supply and identified shortfalls are from the Employment Land Review (2015). These figures have now been updated by both councils, as set out in the Employment Technical Paper, and so the figures quoted can be considered to be out of date.
SO17/82/1739	Chris Flanagan	D An alternative option	Ensure employment opportunities are right for workers (e.g pay/conditions/rights/access)	Support for Growth Scenario D is noted. Whilst the Joint Local Plan can assist in improving access to employment opportunities, pay, conditions and employment rights are outside the remit of the planning system.
SO17/54/1741	David Bourne	D	The City is getting less funding from the government - we need to do whatever we can to bring in funding by ourselves that can be used to further improve the city.	Comment noted. Whilst the Joint Local Plan can apply Developer Contributions or a Community Infrastructure Levy, these can only be collected through granting development proposals and the monies raised can only be spent on addressing the effects of development. A much wider variety of sources of funding for other uses can be collected by the councils outside of the planning system, for example through successfully winning grants from Central Government. The Infrastructure Delivery Plan can explore potential sources for funding for wider environmental improvements.
SO17/53/1742	Dennis Weston	D	The OAN is again supported as a minimum and therefore maximising our economic potential should be aimed for.	Support for Growth Scenario D, and the OAN (Scenario C) as a minimum is noted.
SO17/80/1743	Malcolm Clowes	C	Support for Growth Scenario C and maximising economic growth	Support for Growth Scenario C and maximising economic growth is noted.
SO17/56/1744	Mrs M Hall	A	Support for Growth Scenario A	Support for Growth Scenario A noted.

Reference	Consultee	Consultee Response	Consultee Comments	Officer Comments
SO17/57/1745	The Woodland Trust	Not answered	No preference is given to any of the Employment Growth Options but whichever one is chosen there should be no adverse impacts to Ancient Woodland and Veteran Trees.	Comment noted. Any potential impacts on Ancient Woodland and Veteran Trees will be considered and addressed as work on the Joint Local Plan progresses.
SO17/58/1746	Renew Land Developments LTD	D	Scenario D will help to deliver against the wider economic aspirations set out in the SEP.	Support for Growth Scenario D noted. The targets set out in the SEP are derived from the Cambridge LEFM economic forecast, which are the same as those that underpin the OAN (Growth Scenario C).
SO17/55/1747	Robert Almond	A	Support for Growth Scenario A	Support for Growth Scenario A noted.
SO17/81/1748	Newcastle-under-Lyme Borough Council (Regeneration)	D	Only the availability of good jobs will give young able people a reason to stay here (or to come here), and without a significant pool of young able people the area will degenerate into a sump of poorer and older people. Unless the cycle is broken then already affluent areas will continue to attract more affluent people (and jobs) and less affluent areas are left to scramble for the crumbs and fall further behind. The replacement of an objective-led planning system for the laissez-faire development system we now have (supported by Government appeal decisions) will simply accelerate this trend. The need to recognise the unique opportunity which is provided by Keele University and Science Park and the need to grow this further. This is a form of development (academic, business, research) which can only take place here (not at Lymedale Park or Chatterley Valley) and if it doesn't take place here will take place in the Manchester, Birmingham or Nottingham sub-regions instead, a lost opportunity for the North Staffs economy.	Support for Economic Growth Scenario D noted.

Reference	Consultee	Consultee Response	Consultee Comments	Officer Comments
SO17/234/1749	Richard Atherton	D	Support for Growth Scenario D	Support for Growth Scenario D is noted.
SO17/255/1750	Andrew Alexander	D	Supporting for scenario D in order to help to deliver the wider economic aspirations of the LEP SEP.	Comment and support for Growth Scenario D noted.
SO17/252/1752	Ascalon properties	D	Economic Growth Scenarios A , B and C will not conform with the economic principles contained in NPPF and will not provide a sufficient range of employment land to attract the right level of investment and job creation. The local authorities will lose further ground against more ambitious neighbours and vitality and investment will be lost.	Support for Growth Scenario D is noted. In regard to NPPF conformity, all evidence documents that have informed the Growth Scenarios have been prepared in accordance with requirements of national planning policy.
SO17/267/1753	Aspire Housing	D	Support scenario D in order to help to deliver the wider economic aspirations of the LEP SEP.	Comment and support for Growth Scenario D noted.
SO17/270/1757	D2H	Not answered	Scenarios A and B should be discounted as these will not be NPPF compliant, and Scenarios C and D would require further development and refinement as the Evidence Base develops. Therefore, it is considered that it is not yet possible to provide comment on a possible preferred employment growth scenario. As with the housing growth scenario, there should also be consideration given to potential economic uncertainty that may arise as the UK moves towards its exit from the European Union.	We note your comments discounting Growth Scenarios A and B, and your inability at this stage to show any preference for either of the remaining Scenarios C or D. Scenario C is based on meeting our economic projections, i.e. the OAN; and D maximizing our economic projections. Work to date has been focused on determining the amount of growth we need to plan for and broad locations where it could be accommodated. Further stages of developing the Joint Local Plan will bring in other matters for instance infrastructure, natural environment, heritage, and design.
SO17/251/1759	Dean Lewis Estates	D	The Cheshire East Local Plan Inspector in his final report of 20 June 2017 referenced (para. 47 onwards) that that the implications from HS2 growth and the NNGDZ should appropriately be dealt with under Plan review. This is relevant in that prior to any Regulation 19 consultation the full outcome of those strategic plans will be known.	Support for Employment Growth Scenario D is noted. At this stage, any potential growth in the wider economy arising from HS2 is not being taken into account in the Joint Local Plan, because any economic growth is not sufficiently evidenced yet. It is however recognised that HS2 will have implications on the plan area at some

Reference	Consultee	Consultee Response	Consultee Comments	Officer Comments
			This will bring a series of strategic level matters issues which will require a reversion to Regulation 18 consultation in lieu of the requirement to fully explore the strategic implications. A revised timetable should be produced to appropriately factor this in.	point, but any resulting effects might occur towards the end of the plan-period. At the moment the route is confirmed and a narrow safeguarding strip either side of the proposed route has been identified. The Local Planning Authority is required to notify HS2 of any planning applications in that area.
SO17/260/1760	Dr D Hodgkinson	D	Support for scenario D in order to help to deliver the wider economic aspirations of the LEP SEP.	Comment and support for Growth Scenario D noted.
SO17/258/1762	Elmside Garden Centre	D	Support for scenario D in order to help to deliver the wider economic aspirations of the LEP SEP.	Comment and support for Growth Scenario D noted.
SO17/248/1764	G Colclough-Evans	D	Support for scenario D in order to help to deliver the wider economic aspirations of the LEP SEP.	Support for Scenario D noted.
SO17/241/1765	Maer Hills Protection Group	Don't know / unsure	The number of jobs to be created seems unrealistic in the area. The area has become de-industrialised and has become more attractive to warehousing due to its proximity to the motorway network. Employment growth will be in the care of the elderly and education/recreation for University students and associated high value research and technology employment at places like Keele Innovation Hub. It would seem sensible to concentrate new areas for economic growth and housing within reasonable proximity of each other, which would help to meet core sustainability aims of this plan.	Comment noted. Evidence contained in the Employment Land Review suggests that there will be economic growth in B class employment uses, as well as growth in other sectors. The comments relating to the location of housing and economic growth in close proximity to each other will be considered further at the preferred options stage.
SO17/239/1766	Gary Dean Associates Ltd	C	Support Growth Scenario C.	Support Growth Scenario C is noted.
SO17/236/1767	Mark T Coupe	D	Support for growth scenario D in part due to the relatively low performance of the local economy in previous years.	Support for Growth Scenario D noted.

Reference	Consultee	Consultee Response	Consultee Comments	Officer Comments
SO17/233/1768	WW Planning	D	It can only be the case that the area ought to aspire to maximum economic growth. The poor state of the local economy relative to other parts of the UK is well documented. It must be the ambition to aspire to maximum growth and to improve local economic performance. It can only be the case that the area ought to aspire to maximum economic growth. The poor state of the local economy relative to other parts of the UK is well documented. It must be the ambition to aspire to maximum growth and to improve local economic performance.	Support for Growth Scenario D is noted.
SO17/261/1769	Graham Heath Group	D	Support scenario D in order to help to deliver the wider economic aspirations of the LEP SEP.	Comment and support for Growth Scenario D noted.
SO17/250/1772	Historic England	Not answered	Employment Scenario A, B, C, D does not consider the historic environment in either the opportunity or the challenges box.	Comment noted. At this stage the Strategic Options report is considering housing and employment growth at a very high level to ascertain what level of growth the Joint Local Plan should require. The Joint Local Plan will play an important role in protecting and enhancing the historic environment and historic assets through the selection of sites and the preparation of appropriate local planning policies. The Councils are gathering and preparing evidence on heritage matters which will influence further stages of Joint Local Plan preparation.
SO17/256/1773	Ian Dos Remedios	D	Support for scenario D in order to help to deliver the wider economic aspirations of the LEP SEP.	Comment and support for Growth Scenario D noted.
SO17/272/1774	Intu Properties plc	D	The plan for employment growth in the Joint Local Plan focuses on what might best be described as traditional employment uses. In our view, the Joint Local Plan should take a wider perspective of what contributes to employment growth when setting out its plan for employment growth. The	We acknowledge your preference for Employment Growth Scenario D, and your support for the general approach. The Strategic Options consultation identifies different housing and employment growth scenarios and work to date has been focused on determining the amount of

Reference	Consultee	Consultee Response	Consultee Comments	Officer Comments
			Council should recognise the very important contribution retail and other main town centre uses play in generating employment alongside other employment generating uses.	growth we need to plan for. Employment growth in the Strategic Options consultation document does focus on employment growth from B class use sectors. We acknowledge the wider contribution to employment growth from retail, leisure and other sectors; and evidence on this will inform further stages of the Joint Local Plan.
SO17/257/1775	J A Knight (Coppice) Ltd	D	Support for scenario D in order to help to deliver the wider economic aspirations of the LEP SEP.	Comment and support for Growth Scenario D noted.
SO17/240/1776	The Strategic Land Group	D	Support Scenario D as the preferred employment growth scenario as it will generate the largest amount of new jobs and will, in turn, requires an increase in the number of houses to support an increasing work force. However, as set out above, consideration should be taken of the potential benefits of HS2 and in any event the figures should be quoted as a minimum employment land requirement.	Comment noted. Scenario C is in alignment with the Objectively Assessed Housing Need (OAN) as identified in the SHMA but Growth Scenario D identifies a greater level of growth than the OAN. The implications of HS2 will be considered when more detail about the anticipated levels of growth resulting from the construction and operation of the line become available. The Core Strategy employment land requirement was identified under a different methodology as part of the preparatory work for the West Midlands Regional Spatial Strategy and can not be compared with the more recent calculation in the Employment Land Review (2015).
SO17/254/1777	John Sanders	D	Support for scenario D in order to help to deliver the wider economic aspirations of the LEP SEP.	Comment and support for Growth Scenario D noted.
SO17/264/1778	Keele Homes	D	Support for scenario D in order to help to deliver the wider economic aspirations of the LEP SEP.	Comment and support for Growth Scenario D noted.
SO17/265/1779	Keele University	D	Support growth scenario D and in particular the 'New Keele Deal' in support of Strategic Aim 1	Support for growth scenario D and the 'New Keele Deal' as part of this is noted
SO17/259/1780	Keith Eardley	D	Support for scenario D in order to help to deliver the wider economic aspirations of the LEP SEP.	Comment and support for Growth Scenario D noted.

Reference	Consultee	Consultee Response	Consultee Comments	Officer Comments
SO17/247/1781	Mr Jones	D	Support for Growth Scenario D due to it helping to deliver wider economic aspirations such as those arising from HS2 and the Constellation Partnership.	Support for Scenario D noted. The growth implications of HS2 and the Constellation Partnership will be considered as work on the Joint Local Plan progresses.
SO17/238/1782	St Modwen Developments Ltd	D	Support for scenario D due it helping to deliver the wider LEP and Constellation Partnership aspirations.	Support for Employment Growth Scenario D is noted
SO17/266/1786	Mr and Mrs Rawlins	D	Support scenario D in order to help to deliver the wider economic aspirations of the LEP SEP.	Comment and support for Growth Scenario D noted.
SO17/269/1787	Mr C and Mrs S Taylor	D	Support scenario D in order to help to deliver the wider economic aspirations of the LEP SEP.	Comment and support for Growth Scenario D noted.
SO17/244/1789	Chapel and Hill Chorlton, Maer and Aston and Whitmore Neighbourhood Development Plan	Not answered	Option C is in alignment with the OAN conforms to the National Planning Policy Framework and support growth. We note that it is an optimistic target and would require job creation at a much higher rate than previously seen. We have a concern that if houses are built but jobs are not created this might have several negative impacts for the JLP area. Firstly it would undermine the value of older properties and impede urban regeneration. Secondly it would increase commuting levels and undermine the sustainability of local communities. Nevertheless, we remain optimistic with regard to the areas future potential to create new, high quality employment. The negative impact of option D in terms of environmental objectives makes this option unacceptable.	Support for Growth Scenario C is noted. The Joint Local Plan is required to be able to demonstrate that it can deliver both housing and employment development in balance. Its delivery will be monitored following adoption to ensure that balanced development does take place.
SO17/235/1792	HCA	D	Support for Growth Scenario D	Support for Growth Scenario D is noted
SO17/249/1793	Peter Brett Associates	C D	Support for Growth Scenarios C and D	Support for Scenarios C and D noted

Reference	Consultee	Consultee Response	Consultee Comments	Officer Comments
SO17/246/1796	Richborough Estates	D	Support scenario D in order to support job growth and inward migration resulting from major initiatives such as HS2, the Constellation Partnership and the Keele Deal.	Support for Scenario D noted.
SO17/245/1798	Stoke-on-Trent City Council (Housing)	Not answered	No preference as long as the preferred growth strategy is based on the economic projections.	Comment noted. Growth Scenarios C and D are informed by projections of economic growth (Cambridge LEFM).
SO17/263/1799	SOT Regeneration Ltd and Mr Poole	D	Support for growth scenario D in order to provide an economic uplift and to help to deliver wider economic aspirations such as those of the LEP, HS2, the Constellation Partnership and the Keele Deal.	Comment and support for Growth Scenario D noted.
SO17/271/1800	St Modwen Developments Ltd, Stoke-on-Trent Regeneration Ltd and St Modwen Securities Ltd	D	Support Employment Growth Scenario D	Support for Employment Growth Scenario D is noted.
SO17/262/1801	Staffordshire County Council	Not answered	We have some concerns as to how the figures for economic growth have been reached, and particularly those under scenario D. It does not seem clear as to how the jobs figures for this scenario have been reached. The 18,250 new jobs figure under this scenario has been lifted from table 8.13 of the ELR. This section of the ELR highlights the 'policy on' approach taken and the various developments that have been included within the forecasts including the Ceramic Valley Enterprise Zone, Smithfield and Ryecroft. Whilst many of these developments will undoubtedly be included within the current and emerging economic strategies for the area, given that that the ELR was completed over 18 months ago we would argue that the policy on approach, and	Support for a minimum of Employment Growth Scenario C is noted. We will keep the 'policy on' scenario under review. In regard to how the B class jobs figures have been derived, these have been calculated using the same methodology as that set out within the Employment Land Review (2015). These figures are not presented in the Employment Land Review report as it summarises the methodology rather than setting out each step in detail. Similarly, the employment land requirement does not increase at a similar rate to the floorspace projections because the projections take account of the change of use of existing buildings to and from employment use before calculating the land requirement. At this stage, any potential growth in the wider economy arising from

Reference	Consultee	Consultee Response	Consultee Comments	Officer Comments
			therefore scenario D, is unlikely to align to the economic strategies referenced within the Strategic Options document. While it is suggested that the Growth & Prosperity Strategy is factored into scenario D and this does consider HS2 through the Constellation Partnership, the overall approach to the Strategic Options is that HS2 is not taken into account at this stage.	HS2 is not being taken into account in the Joint Local Plan, because any economic growth is not sufficiently evidenced yet. It is however recognised that HS2 will have implications on the plan area at some point, but any resulting effects might occur towards the end of the plan-period. At the moment the route is confirmed and a narrow safeguarding strip either side of the proposed route has been identified. The Local Planning Authority is required to notify HS2 of any planning applications in that area.
SO17/253/1802	Stephen Beaumont	D	Support for scenario D in order to help to deliver the wider economic aspirations of the LEP SEP.	Comment and support for Growth Scenario D noted.
SO17/237/1805	Lichfields	Don't know / unsure	The contribution of retail and other main town centre uses hasn't been recognised at the Strategic Options stage.	Support for the general approach is noted. At this stage the Joint Local Plan has mainly focused on housing and employment land as these are the main drivers of development. The jobs-led growth forecasts in the Employment Land Review and Strategic Housing Market Assessment do begin with jobs-led growth in all economic sectors (including retail and other main town centre uses) before narrowing down the implications for the employment land requirement. The contribution of retail and leisure, town centre and other sectors to provide jobs and contribute to economic growth is therefore acknowledged and will be further developed as work on the Draft and Final Local Plans progresses.
SO17/268/1808	Urban Vision North Staffordshire	Not answered	Scenarios A and B should be discounted as these will not be NPPF compliant, and Scenarios C and D would require further development and refinement as the Evidence Base develops. Therefore, it is considered that it is not yet possible to provide comment on a possible	We note your comments discounting Growth Scenarios A and B, and your inability at this stage to show any preference for either of the remaining Scenarios C or D. Scenario C is based on meeting our economic projections, i.e. the OAN; and D maximizing our economic projections. Work to

Reference	Consultee	Consultee Response	Consultee Comments	Officer Comments
			preferred employment growth scenario. As with the housing growth scenario, there should also be consideration given to potential economic uncertainty that may arise as the UK moves towards its exit from the European Union.	date has been focused on determining the amount of growth we need to plan for and broad locations where it could be accommodated. Further stages of developing the Joint Local Plan will bring in other matters for instance infrastructure, natural environment, heritage, and design.
SO17/402/1812	Graham and Sylvia Rowe	B	Support for growth scenario B - Do not wish existing infrastructure to be over burdened with excessive new development	We acknowledge your preference for Employment Growth Scenario B and comments relating to development pressure on existing infrastructure.
SO17/400/1814	Mrs M.A. Wareham	A	Support Growth Scenario A	Support for Growth Scenario A is noted
SO17/395/1815	Carl Edwards	D	Support scenario D in order to help to deliver the wider economic aspirations of the LEP SEP.	We acknowledge your support for Employment Growth Scenario D.
SO17/403/1816	Mrs S Y Cornes	Don't know / unsure	Don't know / unsure - I feel a lot is being made of the "economic potential" you refer to. Extending our village will not help that aspect. The growth needs to start in the city and its environs and make use of the run down and derelict areas of the City of Stoke-on-Trent.	The Employment Growth Scenarios do not identify villages as a focus for employment growth. Some of the Broad Location Options do identify villages as potential locations for development however no detail has yet been identified as to how this development could be accommodated in these locations - e.g. by extending villages. The preference for prioritising urban development sites in Stoke-on-Trent is noted.
SO17/404/1817	Pat Lee	D	Support for Employment Growth Scenario D as this reflects the vision and the aims	Support for Employment Growth Scenario D is noted.
SO17/396/1819	Muller Property Group	D	Support Employment Growth Scenario D	Support for Employment Growth Scenario D is noted.
SO17/397/1821	Sam Loweth	C	Support for Employment Growth Scenario C and uncertainty caused by Brexit.	Preference for Employment Growth Scenario C is noted. There is insufficient evidence on any likely impacts from exiting the EU and therefore cannot be taken into account at this stage.

Reference	Consultee	Consultee Response	Consultee Comments	Officer Comments
SO17/398/1822	Thistleberry Residents Association	Not answered	<p>Paragraph 3.11 - 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>Paragraph 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.</p> <p>Paragraph 3.33 - High quality jobs are intrinsically linked to a high quality workforce.</p> <p>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</p>	<p>The main evidence used to inform the OAN is the Strategic Housing Market Assessment (SHMA) and the Joint Employment Land Review (Nathaniel Lichfield and Partners, 2015). This evidence is published on the website. The Employment Land Review considered three economic forecasts for the area (Cambridge Econometrics, Oxford Economics and Experian) and concluded that the most robust basis to plan future economic growth should draw on the modelling produced by Cambridge Econometrics, which would result in the creation of 22,584 additional jobs across the plan area between 2013 and 2039 (17,372 between 2013 and 2033).</p> <p>In regard to how the number of people working from home has affected office development in town centres, this is explored within the Employment Land Review which suggests many of those working from home are likely to be desk based staff. It also identifies changes due more efficient utilisation of office space resulting in a decrease in the amount of floorspace per office worker. The study also suggests that some businesses have been leaving smaller old town centre offices in favour of modern open plan offices in business parks.</p> <p>Development at Chatterley Valley has begun and JCB's Blue Planet building is completed. Chatterley Valley was a Regional Investment Site and is part of the Ceramic Valley Enterprise Zone. Large complex sites such as this take time to be developed out.</p> <p>In regard to the reuse of agricultural buildings for employment uses, this could be considered as a policy approach within the Draft and Final Local Plan, or it could be considered as a policy within a</p>

Reference	Consultee	Consultee Response	Consultee Comments	Officer Comments
			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.	Neighbourhood Plan.
SO17/401/1823	Whitmore Parish Council	An alternative option	Support for an alternative option	Support for an alternative option is noted.
SO17/599/1824	Neale Sheldon	C	Support for Employment Growth Scenario C.	We acknowledge your support for Employment Growth Scenario C.
SO17/600/1825	Stephanie Evans	D	Support for Employment Growth Scenario D. We need to maximise our economic potential because we need better housing, more employment in this area and this would help the future generations to enjoy a better standard of living.	We acknowledge your support for Employment Growth Scenario D.
SO17/601/1826	Steven Malam	A	Support for Employment Growth Scenario A.	We acknowledge your support for Employment Growth Scenario A.
SO17/602/1827	Theatres Trust	Don't know / unsure	Don't know / unsure	No response required.
SO17/603/1828	Jill Freeman	Don't know / unsure	Don't know / unsure. I don't know what the economic growth scenarios are?	The Employment Growth Scenarios A to D were set out in the consultation document.
SO17/604/1829	Michael Hall	Don't know / unsure	Don't know / unsure	No response required.
SO17/605/1830	The Connecting Tracks Project	C	Support for Employment Growth Scenario C. Brownfield sites to be urban wildlife enclaves or re-used for factories. Please could Action Area Plans be considered for Kidsgrove, using the Civil Parish Boundary and for Middleport.	We acknowledge your preference for Employment Growth Scenario C and for the reuse of urban brownfield sites. The need for and geographical extent of Area Action Plans will be considered if a need for them is identified during the Joint Local Plan preparation process. In most cases it may be

Reference	Consultee	Consultee Response	Consultee Comments	Officer Comments
				more appropriate for Parish/Town Councils and community groups (once designated as Neighbourhood Forums) to lead the preparation of Neighbourhood Plans for their area.
SO17/606/1831	Andrew Wickens	Don't know / unsure	Don't know / unsure	No comment required
SO17/607/1832	Richard Nicholl	B	We need to provide jobs and housing for those that live in or are born in this area. Trying to increase economic growth seems to always result in the moving of jobs rather than the creation of new jobs, which just move the problem from one area to another. The rate of population increase has recently tailed off, and with our forthcoming exit from the EU the rate of immigration should also reduce significantly, which will reduce the rate of increase affecting housing and jobs.	We acknowledge your preference for Employment Growth Scenario B, which is based on past trends. There is insufficient evidence on any likely impacts from exiting the EU and therefore cannot be taken into account at this stage.
SO17/608/1833	Donald Butterworth	C D	I suggest a combination of C. & D. as it would be beneficial to the overall economy of the area to achieve the growth projections and beyond although where is the evidence to show how the area has performed in the past against projections. More detail is needed to indicate how growth projections have been determined and what actions are being taken to ensure they are achieved and how progress will be measured. Also recognition of the outcome of Brexit negotiations need to be taken into account and alternative strategies should be drawn up and evaluated against a range of possible outcomes. It is disappointing to note that the Consultation Document does not make a single reference to Brexit and this is a woeful reflection of failure on the Joint Borough and City Councils to recognise the potential impacts of the range of outcomes of	Your preference for a combination of C and D is acknowledged. The detailed evidence for the growth projections is provided in the Strategic Housing Market Assessment and Employment Land Review. Evidence on past performance was discussed at the Issues consultation stage. Evidence to inform and support the Joint Local Plan will continue to be kept up to date as work on it progresses. It isn't yet possible to identify any likely impacts from exiting the EU and therefore cannot be taken into account at this stage.

Reference	Consultee	Consultee Response	Consultee Comments	Officer Comments
			the negotiations and timescales with the likely effect on the availability of funding to support economic development.	
SO17/609/1834	Paul Baddeley	D	Need to attract employment particular higher paid employment. There are challenges around transportation that are not listed.	We acknowledge your preference for Economic Growth Scenario D and a need for higher paid employment opportunities.
SO17/610/1835	Loggerheads Parish Council	C	Support for Growth Scenario C. Given past performance this would be a huge step forward and the effort needed should not be underestimated.	We acknowledge your preference for Employment Growth Scenario C.
SO17/611/1836	Adri Hartveld	A	There should be a focus on reducing the environmental costs and optimizing access, therefore there should only be housing and industrial development in the city and close to town centres and accessible locations in urban areas, excluding Green Belt.	We acknowledge your preference for Economic Growth Scenario A and the preference for development to be focused in the urban area, close to town centres and not in the Green Belt.
SO17/612/1837	Karl Deakes	B	Support for growth scenario B	We acknowledge your preference for Economic Growth Scenario B.
SO17/613/1838	Catherine Salt	D	Investing in attracting employers costs in the short term and in the medium to long term more people are in employment. Employed people have more money to spend (assuming earning a living wage which is easier here than in the south) Also employed parents increase life chances of their children	We acknowledge your preference for Employment Growth Scenario D.
SO17/614/1839	Mr and Mrs Phillips	Not answered	As with the comments relating to the Housing Growth Scenarios - ensure that there are enough facilities available, such as schools, health, jobs and transport, and that brownfield sites should be prioritised over agricultural land and Green Belt.	As with the response to your previous comment, the Joint Local Plan will look to allocate a range of sites that both regenerates the area as well as delivering the development needs required. Furthermore the Local Plan will be accompanied by an Infrastructure Delivery Plan (IDP) which will ensure the appropriate and timely delivery of infrastructure.

Reference	Consultee	Consultee Response	Consultee Comments	Officer Comments
SO17/615/1840	Carlton Woolley	D	New housing should be targeted to be close to areas of economic growth. Building housing outside of the main conurbations and on Green belt land only increases the demand for road traffic between home and ones place of work. Because of the nature of Stoke on Trent (five towns spread out across the city) and NuL there is no unified/ suitable public transport either between any of the outlying districts or even across the city itself. Building homes closer to the areas of economic development help to make better use of public transport or even promotes commuting via bicycle. Following Brexit, maintenance of Green belt and agriculture may be required to bolster the UK's own food production (currently 40% of all UK food consumption is grown in the EU)	We acknowledge your preference for Employment Growth Scenario D. There is insufficient evidence on any likely impacts from exiting the EU and therefore cannot be taken into account at this stage; however in terms of protecting the best and most versatile agricultural land (BMV) the NPPF requires Local planning authorities to take into account the economic and other benefits of BMV. Where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality.
SO17/616/1841	Natural England	Don't know / unsure	Natural England does not have a particular preference for the employment growth scenarios that have been set out but would wish to ensure that the chosen approach results in no adverse impact on any designated nature conservation sites or protected landscapes. We acknowledge the finding of the Sustainability Appraisal which recommends that mitigation measures should include having policies to ensure that development increases efficiency of energy and water usage and waste treatment, protection and enhancement of historic and natural environments and ensuring that infrastructure and services are provided to support the levels of development proposed.	We acknowledge your position demonstrating no need to prefer a particular Growth Scenario at this time, and the consideration required of impacts on designated sites and landscapes.
SO17/617/1843	Lynne Woolley	Don't know / unsure	Building in rural locations and on the outskirts of the city will do nothing for the economic well-being of SoT & NuL. Building near major transport links eg M6 motorway will only encourage heavier congestion on an already over subscribed M6	We acknowledge your uncertainty at this stage to show preference for one of the Employment Growth Options A to D. The comments relating to transportation issues will be considered as work on the Joint Local Plan progresses.

Reference	Consultee	Consultee Response	Consultee Comments	Officer Comments
			motorway, and longer commutes to places like Manchester and Birmingham	
SO17/618/1844	John Lamont	Don't know / unsure	Don't know / unsure	No comment needed.
SO17/619/1845	Janet Lamont	B	Existing population growth is an estimate of need- the area has quite high indicators of poverty and needs to provide skills, training and appropriate employment for existing natural growth in population.	We acknowledge your preference for Employment Growth Scenario B.
SO17/620/1846	Sport England	Not answered	No comments but similar ref. to NPPF 73 and 74 with cross ref. to PPS and BFS if proposals impact on existing sports facilities.	Assessment of open spaces, sport and recreation provision are being, or have been prepared for both authorities and both authorities have adopted Playing Pitch Strategies. These evidence documents will inform future stages of Joint Local Plan preparation, particularly in regard to the preparation of planning policies, the allocation of sites for development and the designation of areas to be protected for development.
SO17/621/1847	M Davies	C	Support for Employment Growth Scenario C.	We acknowledge your preference for Employment Growth Scenario C.
SO17/622/1848	Staffordshire Chambers of Commerce	D	Support for scenario D as it will help to deliver key projects identified within the SEP.	We acknowledge your preference for Employment Growth Scenario D and your aspirations for job creation that this Scenario would enable, i.e. to align with the LEPs vision to boost growth in the LEP economy and make the City of Stoke-on-Trent a core UK city. Of the Scenarios, Employment Growth Scenario C is based on meeting our economic projections. It is the closest aligned to meeting our Objectively Assessed Need (OAN). The main evidence used to inform the OAN is the Strategic Housing Market Assessment (SHMA), SHMA Review 2017 and the Joint

Reference	Consultee	Consultee Response	Consultee Comments	Officer Comments
				Employment Land Review (Nathaniel Lichfield and Partners, 2015). This evidence is published on the website. The 2015 SHMA considered two economic forecasts for the area including Cambridge Econometrics and Experian. These forecasts have since been evaluated through the Employment Land Review which concluded that the most robust basis to plan future economic growth should draw on the modelling produced by Cambridge Econometrics, which would result in the creation of 17,372 additional jobs and 199 hectares of new employment land across the plan area between 2013 and 2033. Housing and Employment land growth are linked and the equivalent growth for housing over the plan period would be 27,800 new homes. Scenario D would require significant uplift above the OAN and the challenge would be providing sufficient land of appropriate quality in the right locations to attract the right investment and support job creation; along with increasing the numbers of homes built to 32180 over the plan period.
SO17/623/1849	Keele Parish Council and Neighbourhood Plan	C	Support the OAN approach but concerned about the potential environment effects of this level of development and ensuring that homes and jobs are delivered in balance.	We acknowledge your preference for Employment Growth Scenario C. In regard to the distinction between economic growth and employment growth, employment growth is referred to in the context of the need to provide development land for B class uses whilst economic growth refers to broader job creation and economic output across all sectors. The Joint Local Plan will need to ensure that new homes and job creation are delivered in a balanced way. All potential social, economic and environmental effects of the preferred growth option will be taken in to account and addressed where possible as work of the Joint Local Plan progresses.

Reference	Consultee	Consultee Response	Consultee Comments	Officer Comments
SO17/624/1850	Peter Jones	A	Support for Employment Growth Scenario A.	We acknowledge your support for Employment Growth Scenario A.
SO17/625/1851	Angela Clarke	C	Support for Employment Growth Scenario C.	We acknowledge your support for Employment Growth Scenario C.
SO17/626/1853	Packmoor Residents Association	D	More jobs, more interest in the areas more skilled and semi-skilled people move in and stay, build houses to house them. Simple.com. Turley et al report makes the wrong conclusions.	We acknowledge your support for Employment Growth Scenario D.
SO17/627/1854	Wenslie Naylor	D	The current proposal makes little or no specific reference to the Service sector which in my submission I am identifying as Performance Arts, arts in general and Sports.	We acknowledge your preference for Employment Growth Scenario D. Work to date has been focused on determining the amount of growth we need to plan for and broad locations where it could be accommodated. The evidence which has supported the work on the Joint Local Plan to date identifies that Employment Growth Scenario D could provide 32,180 jobs, of which 18,250 would be in B class industries. Therefore 13930 jobs could be created in other sectors including amongst others the service sector, arts and sport and recreation. The Strategic Options Consultation document specifically refers to employment land requirements in terms of B class uses as these require the largest amount of land take up. Arts, performance arts and sport uses are generally considered to fall within leisure and educational uses (D1 and D2 use classes) and the need to provide for these uses will be considered later in the plan-making process.
SO17/628/1855	Stephen Peake	A	Support for Growth Scenario A	We acknowledge your preference for Employment Growth Scenario A.
SO17/629/1856	Sue Sandywell	B	Support for Growth Scenario B	We acknowledge your preference for Employment Growth Scenario B.

Reference	Consultee	Consultee Response	Consultee Comments	Officer Comments
SO17/630/1857	Jennifer Cook	Don't know / unsure	Don't know / unsure	We acknowledge your uncertainty at this stage to show preference for one of the Employment Growth Options A to D.
SO17/631/1858	Kidsgrove Independents	B C	Support a combination of scenarios B and C	Your preference for a combination of B and C is acknowledged. Further evidence will inform ongoing stages of Joint Local Plan preparation.
SO17/632/1859	Audley Rural Parish Council	C An alternative option	The Parish Council believe that in order to truly meet this need, there should be employment growth areas within the borough which focuses on both the urban and rural economy. Rural employment would need to be in keeping with the local surroundings, and new opportunities for sustainable farming and alternative rural businesses should be encouraged. However it would be impossible to secure the employment growth targets within the borough while we have an impoverished public transport network and also deteriorating highway asset in the rural areas – which are at further risk of decline due to increasing budget cuts affecting the out of town rural areas. Whilst the Parish Council believe the majority of the employment growth should be focused within the plan area, in order to retain the local wealth in the local economy - it would be short-sighted to miss an opportunity to improve links to other major conurbations and in particular to improve transport links for the residents (and potential future residents) to access the new HS2 train line through public transport links. Much of the appeal of Stoke on Trent and Newcastle is the easy access through transport links such as the M6 for Birmingham and Manchester, airports plus natural assets such as Peak District, Wales and Lake District. Additionally tourism for Stoke on Trent relies on good transport links to major	We acknowledge your preference for Employment Growth Scenario C or an alternative option. The Joint Local Plan will consider the urban and rural economies, yet at this time work to date has been focused on determining the amount of growth we need to plan for and broad locations where it could be accommodated. We acknowledge that there will be movement of people for work and leisure in and out of the area and that the transportation networks need to be able to accommodate that. The area is well placed to benefit from rich natural and built environments and a Midlands location gives easy access to the other parts of England and Wales, this location can be promoted through growth in the Joint Local Plan. There is insufficient evidence available now on the implications of HS2 on the Joint Local Plan area to enable us to take it into account at this stage.

Reference	Consultee	Consultee Response	Consultee Comments	Officer Comments
			<p>railway stations such as HS2. Government policy is about closing the north and south divide by making travel easier and quicker therefore the plan should work to make the most of these opportunities, as currently the northern parts of the borough have no direct links to Crewe or Alsager – which are considered closer than the Town Centre or City Centre. In an ideal world residents of the borough would live, work, spend and play only within the borough however in reality the country does not operate like that. In particular part of what makes an area attractive to young people is the choice to travel easily to other major employment and leisure centres such as Manchester and Birmingham. Therefore taking an inward only investment approach will put off potential young families and professionals from buying into the plan area and new and improved links to the areas outside of the borough/SOT should be encouraged.</p>	
SO17/633/1860	Alderman David Becket	C	<p>This is a realistic option that provides sustainable growth and is the option most likely to achieve the vision. However it is not obvious why this will provide a lower employment land target but job creation at a higher rate. This does not appear logical.</p>	<p>We acknowledge your preference for Employment Growth Scenario C which is based on meeting our economic projections. For each of the Employment Growth Scenarios as the amount of employment land rises so do the jobs, with the exception of scenario A which is based on a continuation of the previous employment land targets from the Core Spatial Strategy. This requirement was derived at a different time and under a different methodology. Since that time, job densities in workplaces have been changing due to changing work practices such as hot-desking and working from home. As a result, the land required to cater for job growth has declined and this is reflected in the newer calculations of the requirements for employment land that are</p>

Reference	Consultee	Consultee Response	Consultee Comments	Officer Comments
				presented in scenarios B, C and D. The evidence for this is presented in the Employment Land Review (2015).
SO17/634/1861	Alan Kinnersley	B	Attempts to encourage economic growth in Newcastle & Stoke appear to have had only average success. Cheshire East Council has proposed economic development alongside the M6 (Radway) which will be a serious competitor with clear transport advantages.	We acknowledge your preference for Employment Growth Scenario B. The Councils regularly meet with neighbouring authorities as part of the duty to cooperate. This includes discussion with Cheshire East Council to consider and determine the implications of development sites and transport infrastructure across both areas, and how the impacts of these can be addressed.
SO17/635/1862	Newcastle under Lyme Liberal Democrats	C	Growth Scenario C supports the OAN for both employment and economic growth. There is little to show how the growth will be provided and we can see no inclusion of the AGRICULTURAL SECTOR, nor detail regarding technical JOBS FOR GRADUATES and reverse the decline in the number of graduates staying in the area.	We acknowledge your preference for Employment Growth Scenario C. Work to date has been focused on determining the amount of growth we need to plan for and broad locations where it could be accommodated. The need for employment development land to cater for growth in B class industries is specifically discussed because these industries require the largest amount of land take up in comparison to other economic sectors. The Employment Land Review (2015) provides significant further detail on the breakdown of the projected job growth within each economic sector, including agriculture. In regard to agricultural industries, the Employment Land Review identifies a projected decline in jobs over the plan period. In regard to jobs for graduates, these can be met in a wide range of economic sectors and may be provided for through technical, academic, professional or other industries. One way of retaining graduates is to ensure that the local housing market caters for them through the provision of homes that are lower cost and appropriate for first time buyers and smaller households. This will be explored further as work

Reference	Consultee	Consultee Response	Consultee Comments	Officer Comments
				on the Joint Local Plan progresses.
SO17/636/1863	Janet Burgess	Don't know / unsure	Don't know / unsure	We acknowledge your uncertainty at this stage to show preference for one of the Employment Growth Options A to D.
SO17/637/1864	Ms Finney	Not answered	Unless everyone works in takeaways etc there will be no more employment	The Employment Land Review (2015) identifies that there is projected job growth in a wide range of industries and is not limited to food and drink.
SO17/638/1865	Glenis Woodcock	A	Support for Employment Growth Scenario A	We acknowledge your preference for Employment Growth Scenario A.
SO17/639/1866	Madeley Parish Council and Neighbourhood Plan Steering Group	C	Support for Employment Growth Scenario C.	We acknowledge your preference for Employment Growth Scenario C.
SO17/640/1867	Ray Williams	A	Support for Employment Growth Scenario A.	We acknowledge your preference for Employment Growth Scenario A.
SO17/641/1868	FUCHS Lubricants (UK) plc	D	THIS IS AN OPPORTUNITY FOR BOTH COUNCIL'S TO MAKE A REAL CHANGE TO THE AREA AND NOT FORMULATING A PLAN TO MAXIMISE ECONOMIC POTENTIAL WOULD APPEAR TO REPRESENT A MISSED OPPORTUNITY	We acknowledge your preference for Employment Growth Scenario D.
SO17/642/1869	Gwyn Griffiths	An alternative option	Opaque evidence base and unrealistic expectations. Something between B & C seems appropriate.	We acknowledge your preference for an alternative Employment Growth Scenario aligned between B and C. Work to date has been focused on determining the amount of growth we need to plan for and broad locations where it could be accommodated. The evidence base is accessible from the Joint Local Plan website.
SO17/643/1870	Stafford Borough Council	C	In terms of the four Housing Growth scenarios, the Borough Council notes that Scenario C – Supporting Economic Growth (OAN) would	Support for Scenario C and the acknowledgement that this will require a net inflow of new residents is noted.

Reference	Consultee	Consultee Response	Consultee Comments	Officer Comments
			provide the level of additional housing in order to support Employment Growth Scenario C – Meeting our Economic Projections (OAN). However these growth scenarios will require a significant net inflow of new residents each year, as the existing labour force is insufficient to provide for future growth, which could impact on adjacent areas.	
SO17/598/1872	Cynthia England	A	Support for Employment Growth Scenario A.	We acknowledge your support for Employment Growth Scenario A.

Question 5: The broad locations for future housing and economic development

6 options are identified in the Consultation Document to accommodate future housing and employment growth. The opportunities and challenges are highlighted for each of the 6 options. Which of the six economic and housing broad location options do you consider should be preferred?

- 1: Carry on with the existing Core Spatial Strategy of targeted regeneration;
- 2: Urban Focus;
- 3: Suburban Focus;
- 4: Combined Urban, Suburban and Rural Villages;
- 5: Combined (Option 4) + Scattered Development in the Open Countryside & Green Belt;
- 6: Combined (Option 4) + Major Urban & Rural Extensions in the Countryside and Green Belt;
- Don't know / unsure
- An alternative option

Reference	Consultee	Consultee Response	Consultee Comments	Officer Comments
SO17/45/1729	Gary Picken	2	I believe the areas shown in option 2 is where both housing and employment land development should be restricted too. I do however believe that the option 2 zone can deliver the 27000 houses rather than 11000 identified in the SHLAA 2017 report. This report is inadequate in that it makes no allowance for the change of use of city centre shops into flats which will inevitably happen over the next 20 years as shopping takes place more on line and walk in shops also downsize stock to remain competitive. This inner city regeneration is the only way to deliver the aims 02 to 06 of the vision 'as great places to live and work with active communities at their heart. A great central innovative hub for investment. The area is supportive of new and innovative development whilst embracing and protecting the historic built heritage and natural environment within their urban areas'.	Support for option 2 noted. Evidence relating to retail and leisure will inform subsequent stages of the Local Plan.

Reference	Consultee	Consultee Response	Consultee Comments	Officer Comments
SO17/47/1730	B Isaac, G Downs and J Talbot	6	<p>Option 6 provides an opportunity to support both the existing urban core and the rural areas by providing extensions to the urban area and in sustainably located villages. This option also acknowledges that there has been historic inactivity in the provision of new housing within the Inner Urban Core (which has contributed to both Councils' failing to demonstrate a five year housing land supply). Whereas there are more viable and deliverable sites in other sustainable locations which reflect the demand for housing in the area (most notably on sites located on the edge of the Urban Area and sites focused within Newcastle-under-Lyme). This strategy will facilitate the carefully managed provision of new housing and employment land through urban extensions and sustainable developments in the Green Belt. By choosing this option, there would be a greater appetite to build houses within the Market Housing Area, which would in turn provide the Councils with an opportunity to demonstrate a five year housing land supply and thus have more control during the plan period to guide the location of new housing development as opposed to being forced to accept ad-hoc housing schemes throughout the area. Furthermore, the provision of a range of both larger and smaller housing allocations can provide opportunities for a range of housing developments to come forward during the plan period to suit the wide ranging settlements. This will in turn provide opportunities to deliver the level of affordable housing, supporting infrastructure and community facilities that both Councils are seeking to achieve during the plan period.</p>	Support for option 6 is noted.

Reference	Consultee	Consultee Response	Consultee Comments	Officer Comments
SO17/49/1731	Mr G Adams	6	<p>Option 6 provides an opportunity to support both the existing urban core and the rural areas by providing extensions to the urban area and in sustainably located villages. This option also acknowledges that there has been historic inactivity in the provision of new housing within the Inner Urban Core (which has contributed to both Councils' failing to demonstrate a five year housing land supply). Whereas there are more viable and deliverable sites in other sustainable locations which reflect the demand for housing in the area (most notably on sites located on the edge of the Urban Area and sites focused within Newcastle-under-Lyme). This strategy will facilitate the carefully managed provision of new housing and employment land through urban extensions and sustainable developments in the Green Belt. By choosing this option, there would be a greater appetite to build houses within the Market Housing Area, which would in turn provide the Councils with an opportunity to demonstrate a five year housing land supply and thus have more control during the plan period to guide the location of new housing development as opposed to being forced to accept ad-hoc housing schemes throughout the area. Furthermore, the provision of a range of both larger and smaller housing allocations can provide opportunities for a range of housing developments to come forward during the plan period to suit the wide ranging settlements. This will in turn provide opportunities to deliver the level of affordable housing, supporting infrastructure and community facilities that both Councils are seeking to achieve during the plan period.</p>	Support for option 6 noted.

Reference	Consultee	Consultee Response	Consultee Comments	Officer Comments
SO17/46/1732	Ian Jefferies	6	<p>Option 6 provides an opportunity to support both the existing urban core and the rural areas by providing extensions to the urban area and in sustainably located villages. This option also acknowledges that there has been historic inactivity in the provision of new housing within the Inner Urban Core (which has contributed to both Councils' failing to demonstrate a five year housing land supply). Whereas there are more viable and deliverable sites in other sustainable locations which reflect the demand for housing in the area (most notably on sites located on the edge of the Urban Area and sites focused within Newcastle-under-Lyme). This strategy will facilitate the carefully managed provision of new housing and employment land through urban extensions and sustainable developments in the Green Belt. By choosing this option, there would be a greater appetite to build houses within the Market Housing Area, which would in turn provide the Councils with an opportunity to demonstrate a five year housing land supply and thus have more control during the plan period to guide the location of new housing development as opposed to being forced to accept ad-hoc housing schemes throughout the area. Furthermore, the provision of a range of both larger and smaller housing allocations can provide opportunities for a range of housing developments to come forward during the plan period to suit the wide ranging settlements. This will in turn provide opportunities to deliver the level of affordable housing, supporting infrastructure and community facilities that both Councils are seeking to achieve during the plan period.</p>	Support for option 6 is noted.

Reference	Consultee	Consultee Response	Consultee Comments	Officer Comments
SO17/48/1733	J, R and M Hollins	6	<p>Option 6 provides an opportunity to support both the existing urban core and the rural areas by providing extensions to the urban area and in sustainably located villages. This option also acknowledges that there has been historic inactivity in the provision of new housing within the Inner Urban Core (which has contributed to both Councils' failing to demonstrate a five year housing land supply). Whereas there are more viable and deliverable sites in other sustainable locations which reflect the demand for housing in the area (most notably on sites located on the edge of the Urban Area and sites focused within Newcastle-under-Lyme). This strategy will facilitate the carefully managed provision of new housing and employment land through urban extensions and sustainable developments in the Green Belt. By choosing this option, there would be a greater appetite to build houses within the Market Housing Area, which would in turn provide the Councils with an opportunity to demonstrate a five year housing land supply and thus have more control during the plan period to guide the location of new housing development as opposed to being forced to accept ad-hoc housing schemes throughout the area. Furthermore, the provision of a range of both larger and smaller housing allocations can provide opportunities for a range of housing developments to come forward during the plan period to suit the wide ranging settlements. This will in turn provide opportunities to deliver the level of affordable housing, supporting infrastructure and community facilities that both Councils are seeking to achieve during the plan period.</p>	Support for option 6 is noted.

Reference	Consultee	Consultee Response	Consultee Comments	Officer Comments
SO17/44/1734	Julie Everst Young	6	<p>Option 6 provides an opportunity to support both the existing urban core and the rural areas by providing extensions to the urban area and in sustainably located villages. This option also acknowledges that there has been historic inactivity in the provision of new housing within the Inner Urban Core (which has contributed to both Councils' failing to demonstrate a five year housing land supply). Whereas there are more viable and deliverable sites in other sustainable locations which reflect the demand for housing in the area (most notably on sites located on the edge of the Urban Area and sites focused within Newcastle-under-Lyme). This strategy will facilitate the carefully managed provision of new housing and employment land through urban extensions and sustainable developments in the Green Belt. By choosing this option, there would be a greater appetite to build houses within the Market Housing Area, which would in turn provide the Councils with an opportunity to demonstrate a five year housing land supply and thus have more control during the plan period to guide the location of new housing development as opposed to being forced to accept ad-hoc housing schemes throughout the area. Furthermore, the provision of a range of both larger and smaller housing allocations can provide an opportunity for a range of housing developments to come forward during the plan period to suit the wide ranging settlements. This will in turn provide opportunities to deliver the level of affordable housing, supporting infrastructure and community facilities that both Councils are seeking to achieve during the plan period.</p>	Support for option 6 noted.

Reference	Consultee	Consultee Response	Consultee Comments	Officer Comments
SO17/51/1735	Mazar Hussain	6	<p>Option 6 provides an opportunity to support both the existing urban core and the rural areas by providing extensions to the urban area and in sustainably located villages. This option also acknowledges that there has been historic inactivity in the provision of new housing within the Inner Urban Core (which has contributed to both Councils' failing to demonstrate a five year housing land supply). Whereas there are more viable and deliverable sites in other sustainable locations which reflect the demand for housing in the area (most notably on sites located on the edge of the Urban Area and sites focused within Newcastle-under-Lyme). This strategy will facilitate the carefully managed provision of new housing and employment land through urban extensions and sustainable developments in the Green Belt. By choosing this option, there would be a greater appetite to build houses within the Market Housing Area, which would in turn provide the Councils with an opportunity to demonstrate a five year housing land supply and thus have more control during the plan period to guide the location of new housing development as opposed to being forced to accept ad-hoc housing schemes throughout the area. Furthermore, the provision of a range of both larger and smaller housing allocations can provide an opportunity for a range of housing developments to come forward during the plan period to suit the wide ranging settlements. This will in turn provide opportunities to deliver the level of affordable housing, supporting infrastructure and community facilities that both Councils are seeking to achieve during the plan period.</p>	Support for option 6 noted.

Reference	Consultee	Consultee Response	Consultee Comments	Officer Comments
SO17/43/1736	P Marson, J Marson and A Manning	6	<p>Option 6 provides an opportunity to support both the existing urban core and the rural areas by providing extensions to the urban area and in sustainably located villages. This option also acknowledges that there has been historic inactivity in the provision of new housing within the Inner Urban Core (which has contributed to both Councils' failing to demonstrate a five year housing land supply). Whereas there are more viable and deliverable sites in other sustainable locations which reflect the demand for housing in the area (most notably on sites located on the edge of the Urban Area and sites focused within Newcastle-under-Lyme). This strategy will facilitate the carefully managed provision of new housing and employment land through urban extensions and sustainable developments in the Green Belt. By choosing this option, there would be a greater appetite to build houses within the Market Housing Area, which would in turn provide the Councils with an opportunity to demonstrate a five year housing land supply and thus have more control during the plan period to guide the location of new housing development as opposed to being forced to accept ad-hoc housing schemes throughout the area. Furthermore, the provision of a range of both larger and smaller housing allocations can provide an opportunity for a range of housing developments to come forward during the plan period to suit the wide ranging settlements. This will in turn provide opportunities to deliver the level of affordable housing, supporting infrastructure and community facilities that both Councils are seeking to achieve during the plan period.</p>	Support for option 6 is noted.

Reference	Consultee	Consultee Response	Consultee Comments	Officer Comments
SO17/42/1737	Smartbuild & Design Limited	6	<p>Option 6 provides an opportunity to support both the existing urban core and the rural areas by providing extensions to the urban area and in sustainably located villages. This option also acknowledges that there has been historic inactivity in the provision of new housing within the Inner Urban Core (which has contributed to both Councils' failing to demonstrate a five year housing land supply). Whereas there are more viable and deliverable sites in other sustainable locations which reflect the demand for housing in the area (most notably on sites located on the edge of the Urban Area and sites focused within Newcastle-under-Lyme). This strategy will facilitate the carefully managed provision of new housing and employment land through urban extensions and sustainable developments in the Green Belt. By choosing this option, there would be a greater appetite to build houses within the Market Housing Area, which would in turn provide the Councils with an opportunity to demonstrate a five year housing land supply and thus have more control during the plan period to guide the location of new housing development as opposed to being forced to accept ad-hoc housing schemes throughout the area. Furthermore, the provision of a range of both larger and smaller housing allocations can provide an opportunity for a range of housing developments to come forward during the plan period to suit the wide ranging settlements. This will in turn provide opportunities to deliver the level of affordable housing, supporting infrastructure and community facilities that both Councils are seeking to achieve during the plan period.</p> <p>Knights would welcome the opportunity to meet the</p>	<p>We welcome your support to ensure that the Joint Local Plan meets the Objectively Assessed Need (OAN) which is set out in Housing Growth Scenario C. At this time Options 1-4 do not indicate that they hold sufficient capacity to deliver the OAN for housing across the Housing Market Area (HMA). Both Councils will continue to gather evidence and monitor housing and employment land planning application and completion data to inform deliverability of the OAN. We agree Option 5 need not bring forward sustainable development, whereas Option 6 would enable further locations to be considered where they could provide opportunities for sustainable development.</p>

Reference	Consultee	Consultee Response	Consultee Comments	Officer Comments
			local planning authority in due course to consider further the merits of Option 6, which are considered to be the most suitable option to deliver the Councils' aspirations to deliver the housing and employment land that is required during the plan period.	
SO17/50/1738	TFK Property Limited	6	<p>Option 6 provides an opportunity to support both the existing urban core and the rural areas by providing extensions to the urban area and in sustainably located villages. This option also acknowledges that there has been historic inactivity in the provision of new housing within the Inner Urban Core (which has contributed to both Councils' failing to demonstrate a five year housing land supply). Whereas there are more viable and deliverable sites in other sustainable locations which reflect the demand for housing in the area (most notably on sites located on the edge of the Urban Area and sites focused within Newcastle-under-Lyme). This strategy will facilitate the carefully managed provision of new housing and employment land through urban extensions and sustainable developments in the Green Belt. By choosing this option, there would be a greater appetite to build houses within the Market Housing Area, which would in turn provide the Councils with an opportunity to demonstrate a five year housing land supply and thus have more control during the plan period to guide the location of new housing development as opposed to being forced to accept ad-hoc housing schemes throughout the area. Furthermore, the provision of a range of both larger and smaller housing allocations can provide an opportunity for a range of housing developments to come forward during the plan period to suit the wide ranging settlements. This will in turn provide</p>	Support for option 6 noted.

Reference	Consultee	Consultee Response	Consultee Comments	Officer Comments
			opportunities to deliver the level of affordable housing, supporting infrastructure and community facilities that both Councils are seeking to achieve during the plan period.	
SO17/61/1739	Chris Flanagan	An alternative option	Focus on the 'between' areas of the towns, (e.g Cliffe Vale/Shelton/Joiners square/Cobridge, etc.)	While each of the spatial options presented within the Strategic Options consultation includes areas between towns. The support to focus development specifically within these areas is noted.
SO17/63/1741	David Bourne	no response	The 'options preferred' box above is blank but they have submitted a comment, so their original response may have indicated a preferred option or the suggestion of an alternative option. I haven't located the original response so I haven't been able to verify this.	Comments noted. The use or protection of Green Belt land and appropriate uses in town centres will begin to be explored from the preferred options stage onwards.
SO17/62/1742	Dennis Weston	Don't know / unsure	It is considered no one option can be preferred and all options would have a part to play. Each proposed site has to be considered on its merits for its proposed use and none of the options 1 to 6 on their own should be solely considered. Only housing should apply to green belt areas I have identified previously at Primrose Hill, Hanford (ST4 8QT) possible housing development using infill land and an extension of the services from the adjacent pocket of land (Which already has approval for housing) ie extension of drains, etc. should be applied in this instance which common sense dictates and for sustainability and this land is owned by the government ie the land was part of south hanford farm which was owned by the old national coal board.	The Joint Local Plan will look to allocate a range of sites that both regenerates the area as well as delivering the housing need across the area in accordance with the strategy. Each site will be considered accordingly on its own merits.
SO17/59/1743	Malcolm Clowes	6	Option 6 is strongly supported. This option will most appeal to the market and has	Support for option 6 is noted.

Reference	Consultee	Consultee Response	Consultee Comments	Officer Comments
			best chance of providing for a range of housing types in varying locations across the area. It would allow a review of the Green Belt to be undertaken to see where land might be released without causing undue harm to the essential functions of the Green Belt. To the East of the conurbation this would address the fact that there is a considerable depth and extent of Green Belt land between the urban edge of Stoke-on-Trent and the nearest towns and villages lying within Staffordshire Moorlands. It is such edge of City locations and those within high quality urban locations which are most likely be attractive to and suitable for the executive housing and customs build housing for which there is a clear and demonstrable need.	
SO17/65/1744	Mrs M Hall	1	Definitely no development in the green belt. Every effort should be made to develop the many brown field sites in the area.	Support for Option 1 and the prioritisation of brownfield land and the protection of the Green Belt is noted.
SO17/66/1745	The Woodland Trust	no response	Ensure that no ancient woodland or veteran trees are adversely affected by the location of development.	The preferred strategy for the location of future development will take in to account and assess any potential environmental impacts, including any negative impacts on ancient woodland and veteran trees.
SO17/67/1746	Renew Land Developments LTD	4 6	Option 6 provides an opportunity to support both the existing urban core and the rural areas by providing extensions to the urban area and in sustainably located villages. This option also acknowledges that there has been historic inactivity in the provision of new housing within the Inner Urban Core (which has contributed to both Councils' failing to demonstrate a five year housing land supply). Whereas there are more viable and deliverable sites in other sustainable locations which reflect the demand for housing in the area	Support for option 6 noted.

Reference	Consultee	Consultee Response	Consultee Comments	Officer Comments
			(most notably on sites located on the edge of the Urban Area and sites focused within Newcastle-under-Lyme). This strategy will facilitate the carefully managed provision of new housing and employment land through urban extensions and sustainable developments in the Green Belt. By choosing this option, there would be a greater appetite to build houses within the Market Housing Area, which would in turn provide the Councils with an opportunity to demonstrate a five year housing land supply and thus have more control during the plan period to guide the location of new housing development as opposed to being forced to accept ad-hoc housing schemes throughout the area. Furthermore, the provision of a range of both larger and smaller housing allocations can provide opportunities for a range of housing developments to come forward during the plan period to suit the wide ranging settlements. This will in turn provide opportunities to deliver the level of affordable housing, supporting infrastructure and community facilities that both Councils are seeking to achieve during the plan period.	
SO17/64/1747	Robert Almond	1	Support Option 1	Support for option 1 noted.
SO17/60/1748	Newcastle-under-Lyme Borough Council (Regeneration)	6	Limiting development to the existing urban core places too great a restriction on the area's opportunities for growth but, conversely, the suburban and scattered options do not give enough encouragement to the regeneration of town centres and older urban areas. The most effective option would be to plan for a limited number of planned urban extensions (in sustainable locations and	Support for option 6 noted.

Reference	Consultee	Consultee Response	Consultee Comments	Officer Comments
			within easy travel distance to the main urban centres of employment) such as the Newcastle Western Extension whilst still pursuing a programme of urban regeneration based on recycling viable urban sites both for development and physical restoration and supporting town centres.	
SO17/276/1749	Richard Atherton	6	Our client supports the option 6 approach of identifying specific locations for housing and employment growth. One such location considered suitable for housing growth is Baldwins Gate, which contains a good range of services for its size. Three different Inspectors have taken the view that Baldwin's Gate has sufficient facilities to justify a description of a "sustainable location".	Support for option 6 noted.
SO17/299/1750	Andrew Alexander	6	Our client strongly supports Option 6: 'Combined (Option 4) + Major Urban & Rural Extensions into the Countryside and Green Belt'. Option 5 provides for a higher number of dwellings to be provided during the plan period (49,400 dwellings compared to 41,900 dwellings as proposed in Option 6), the strategy of piecemeal growth spread around the wider urban area would not deliver the Councils' Aims and Objectives of promoting sustainable growth that would be delivered through the strategy of targeting growth within specific urban and rural locations that Option 6 provides. Options 1 - 4 are considered to be unsound on the basis that the level of housing proposed would fall below the OAN figure. Option 6 provides an opportunity to support both the existing urban core and the rural areas by providing extensions to the urban area and in sustainably located villages. This option also acknowledges that there has been historic inactivity in the provision of new housing within the Inner	Support for Option 6 is noted.

Reference	Consultee	Consultee Response	Consultee Comments	Officer Comments
			Urban Core (which has contributed to both Councils' failing to demonstrate a five year housing land supply).	
SO17/296/1752	Ascalon properties	5 6	We support Options 5 and 6. Options 1 - 4 are unacceptable on the basis that the level of housing proposed would fall below the OAN figure. Only through a strategy which both supports development in the urban core and also distributes housing also across a more diverse area will the variety of sites that are needed to meet the OAN come forward. This means allocating suitable greenfield sites within the urban core which are not restricted for viability reasons, and then looking beyond that core to suitable greenbelt sites. A greater diversity of geographic locations means a wider range of different sites. More diversity of sites means greater numbers of market housing would be delivered in the plan period so the OAN stands a better chance of being met and economic prosperity supported. The council's current reliance on brownfield site regeneration in the urban core fails to respond to the economic realities of where demand exists for new homes, and the viability challenges that creates has led to existing problems with housing supply.	Support for Options 5 and 6 are noted.
SO17/313/1753	Aspire Housing	6	Our client strongly supports Option 6: 'Combined (Option 4) + Major Urban & Rural Extensions into the Countryside and Green Belt'. Option 5 provides for a higher number of dwellings to be provided during the plan period (49,400 dwellings compared to 41,900 dwellings as proposed in Option 6), the strategy of piecemeal growth spread around the wider urban area would not deliver the Councils' Aims and Objectives of promoting sustainable	Support for Option 6 is noted.

Reference	Consultee	Consultee Response	Consultee Comments	Officer Comments
			growth that would be delivered through the strategy of targeting growth within specific urban and rural locations that Option 6 provides. Options 1 - 4 are considered to be unsound on the basis that the level of housing proposed would fall below the OAN figure. Option 6 provides an opportunity to support both the existing urban core and the rural areas by providing extensions to the urban area and in sustainably located villages. This option also acknowledges that there has been historic inactivity in the provision of new housing within the Inner Urban Core (which has contributed to both Councils' failing to demonstrate a five year housing land supply). Aspire Housing consider that in addition to the general principles set out in Option 6, that the Councils expand this to include/support a defined strategy for subsidizing the redevelopment of brownfield land, which could in turn promote bringing forward of a greater level of both affordable and open market housing within the Urban Area (and across the entire Plan area).	
SO17/311/1754	Betley, Balterley & Wrinehill Neighbourhood Plan Steering Group and Parish Council	An alternative option	The Steering Group is anxious to avoid any strategy option which might mean that non-urban locations come under severe pressure from unplanned and unsustainable development. The Steering Group would welcome, therefore, the development of new strategy which should incorporate the OAN from its Neighbourhood Plan, thereby minimising environmental harm and satisfying the needs and requirements of the local community as expressly emphasised in current government legislation.	The SHMA and Council's OAN is based on robust evidence and the Local Plan will seek to apportion this in an acceptable, sustainable manner.

Reference	Consultee	Consultee Response	Consultee Comments	Officer Comments
SO17/319/1756	CPRE Staffordshire	2	Intu is generally supportive of the 'Urban Focus' scenario. However, one the purported challenges under this scenario is 'the potential future demands that will be made on the City Centre and town centres for additional town centre development'. Intu considers meeting the needs for retail and other main town centre uses should not be seen as a 'challenge' or 'threat' to housing and economic development objectives. Rather, meeting these needs will directly contribute to the plan's employment and economic development objectives and make it a more attractive place to live and work. Intu considers that the Council must take a wider and more holistic view of the role of retail and main town centre uses in meeting future employment and economic development objectives.	Support for Option 2 is noted.
SO17/317/1757	D2H	An alternative option	None of the options presented would be a preferred option. In terms of moving towards a preferred option, close consideration needs to be given to the spatial aspects of what will be the city region's key economic drivers over the coming years, for example; HS2 and Northern Gateway Development Zone, Ceramic Valley Enterprise Zone, educational assets, town centres (including Hanley).	Suggested alternative option noted. The councils will consider this as part of preparation of the preferred option.
SO17/295/1759	Dean Lewis Estates	6	We support option 6; which at least offers highest growth with the only realistic delivery model to meet strategic needs. There should in any case not be any ceiling figures. Sustainable opportunities should not be precluded. It is at this stage unknown what the level of reliability is on the evidence base in that most has not been published, and should be clearly informing the chosen spatial option. It is known that Governmental housing need evidence	Support for Option 6 is noted.

Reference	Consultee	Consultee Response	Consultee Comments	Officer Comments
			methodology is being radically revised, and geared toward accelerated housing delivery. This is due shortly and needs to be taken full account of in setting base targets.	
SO17/304/1760	Dr D Hodgkinson	6	Our client strongly supports Option 6: 'Combined (Option 4) + Major Urban & Rural Extensions into the Countryside and Green Belt'. Option 5 provides for a higher number of dwellings to be provided during the plan period (49,400 dwellings compared to 41,900 dwellings as proposed in Option 6), the strategy of piecemeal growth spread around the wider urban area would not deliver the Councils' Aims and Objectives of promoting sustainable growth that would be delivered through the strategy of targeting growth within specific urban and rural locations that Option 6 provides. Options 1 - 4 are considered to be unsound on the basis that the level of housing proposed would fall below the OAN figure. Option 6 provides an opportunity to support both the existing urban core and the rural areas by providing extensions to the urban area and in sustainably located villages. This option also acknowledges that there has been historic inactivity in the provision of new housing within the Inner Urban Core (which has contributed to both Councils' failing to demonstrate a five year housing land supply).	Support for option 6 noted.
SO17/302/1762	Elmside Garden Centre	6	Our client strongly supports Option 6: 'Combined (Option 4) + Major Urban & Rural Extensions into the Countryside and Green Belt'. Option 5 provides for a higher number of dwellings to be provided during the plan period (49,400 dwellings compared to 41,900 dwellings as proposed in Option 6), the strategy of piecemeal growth spread around the wider urban area would not deliver the Councils'	Support for Option 6 is noted.

Reference	Consultee	Consultee Response	Consultee Comments	Officer Comments
			Aims and Objectives of promoting sustainable growth that would be delivered through the strategy of targeting growth within specific urban and rural locations that Option 6 provides. Options 1 - 4 are considered to be unsound on the basis that the level of housing proposed would fall below the OAN figure. Option 6 provides an opportunity to support both the existing urban core and the rural areas by providing extensions to the urban area and in sustainably located villages. This option also acknowledges that there has been historic inactivity in the provision of new housing within the Inner Urban Core (which has contributed to both Councils' failing to demonstrate a five year housing land supply).	
SO17/292/1764	G Colclough-Evans	6	Our client strongly supports Option 6: 'Combined (Option 4) + Major Urban & Rural Extensions into the Countryside and Green Belt'. Option 6 provides an opportunity to support both the existing urban core and the rural areas by providing extensions to the urban area and in sustainably located villages. This option also acknowledges that there has been historic inactivity in the provision of new housing within the Inner Urban Core (which has contributed to both Councils' failing to demonstrate a five year housing land supply).	Support for Option 6 is noted.
SO17/283/1765	Maer Hills Protection Group	Don't know / unsure	Primarily we believe that preserving existing landscapes and amenity value of the area should be an important strategic consideration when selecting areas for Housing and Economic development.	Comments are noted.

Reference	Consultee	Consultee Response	Consultee Comments	Officer Comments
SO17/281/1766	Gary Dean Associates Ltd	6	Option 6 is sufficiently flexible to allow well connected non green belt sites to come forward throughout the plan areas. Improvements to local infrastructure to improve connectivity and ease congestion, and also provide community facilities, where needed, could be secured through development packages.	Support for Option 6 noted.
SO17/278/1767	Mark T Coupe	6	Option 6 is strongly supported. This option will most appeal to the market and has best chance of providing for a range of housing types in varying locations across the area. It would allow a review of the Green Belt to be undertaken to see where land might be released without causing undue harm to the essential functions of the Green Belt.	Support for Option 2 is noted.
SO17/274/1768	WW Planning	6	<p>This option will most appeal to the market and has best chance of providing for a range of housing types in varying locations across the area. It would allow a review of the Green Belt to be undertaken to see where land might be released without causing undue harm to the essential functions of the Green Belt.</p> <p>To the West of Newcastle-under-Lyme the Green Belt is a tight constraint on development options. In the absence of an up to date development plan there is clear evidence of development (housing) leap-frogging beyond the Green Belt to places such as Loggerheads and Baldwins Gate. Without the considered release of Green Belt sites such as land at Silverdale (owned by this respondent) this outward migration of homes and investment will continue. In this context close examination of land in and around Keele and Silverdale needs to be given to determine whether and if Green Belt boundaries can be changed in order to promote the</p>	Support for option 6 noted.

Reference	Consultee	Consultee Response	Consultee Comments	Officer Comments
			assembly of large sites suitable for a mixed housing having high quality settings in sustainable locations.	
SO17/305/1769	Graham Heath Group	6	Our client strongly supports Option 6: 'Combined (Option 4) + Major Urban & Rural Extensions into the Countryside and Green Belt'. Option 5 provides for a higher number of dwellings to be provided during the plan period (49,400 dwellings compared to 41,900 dwellings as proposed in Option 6), the strategy of piecemeal growth spread around the wider urban area would not deliver the Councils' Aims and Objectives of promoting sustainable growth that would be delivered through the strategy of targeting growth within specific urban and rural locations that Option 6 provides. Options 1 - 4 are considered to be unsound on the basis that the level of housing proposed would fall below the OAN figure. Option 6 provides an opportunity to support both the existing urban core and the rural areas by providing extensions to the urban area and in sustainably located villages. This option also acknowledges that there has been historic inactivity in the provision of new housing within the Inner Urban Core (which has contributed to both Councils' failing to demonstrate a five year housing land supply).	Support for Option 6 is noted.
SO17/275/1770	Glynn Edwards	2	I appreciate the need for new housing, especially affordable homes. So often when such dwellings have been built, big concerns buy them to rent out at top prices to folk in need of a home. I believe this practice needs looking at and preventing if possible. I strongly object to greenbelt land being used for housing when there are already many brown sites	Support for option 2 noted.

Reference	Consultee	Consultee Response	Consultee Comments	Officer Comments
			in the North Staffordshire conurbation. I urge planning officers to explore every way possible to refill such areas with suitable housing for the needs of that locality, even helping with necessary clearance costs so that developers don't need to destroy new fields and turn them into housing estates as they find this practice will provide them with more profit. Countryside, habitat and "the lungs of North Staffordshire" need protecting for future generations as once gone such landscape and environment can never be replaced.	
SO17/294/1772	Historic England	no response	Chapter 6 considers the broad locations for employment and housing growth yet it is not until Option 4 on page 51 that the historic environment is mentioned, and then only as a challenge. Option 5 considers a Green Belt release and we wondered what assessment the Council were undertaking to consider if a Green Belt release was appropriate and whether the 5 objectives of Green Belt policy including the objective for historic towns was being considered.	Work to date has been focused on determining the amount of growth we need to plan for and broad locations where it could be accommodated. Further stages of developing the Joint Local Plan will explore and be informed by detailed heritage matters. An assessment of the Green Belt is currently underway and will inform the preferred strategy.
SO17/300/1773	Ian Dos Remedios	6	Our client strongly supports Option 6: 'Combined (Option 4) + Major Urban & Rural Extensions into the Countryside and Green Belt'. Option 5 provides for a higher number of dwellings to be provided during the plan period (49,400 dwellings compared to 41,900 dwellings as proposed in Option 6), the strategy of piecemeal growth spread around the wider urban area would not deliver the Councils' Aims and Objectives of promoting sustainable growth that would be delivered through the strategy of targeting growth within specific urban and rural locations that Option 6 provides. Options 1 - 4 are considered to be unsound on the basis that the level of housing proposed would fall below the	Support for Option 6 is noted.

Reference	Consultee	Consultee Response	Consultee Comments	Officer Comments
			OAN figure. Option 6 provides an opportunity to support both the existing urban core and the rural areas by providing extensions to the urban area and in sustainably located villages. This option also acknowledges that there has been historic inactivity in the provision of new housing within the Inner Urban Core (which has contributed to both Councils' failing to demonstrate a five year housing land supply).	
SO17/301/1775	J A Knight (Coppice) Ltd	6	Our client strongly supports Option 6: 'Combined (Option 4) + Major Urban & Rural Extensions into the Countryside and Green Belt'. Option 5 provides for a higher number of dwellings to be provided during the plan period (49,400 dwellings compared to 41,900 dwellings as proposed in Option 6), the strategy of piecemeal growth spread around the wider urban area would not deliver the Councils' Aims and Objectives of promoting sustainable growth that would be delivered through the strategy of targeting growth within specific urban and rural locations that Option 6 provides. Options 1 - 4 are considered to be unsound on the basis that the level of housing proposed would fall below the OAN figure. Option 6 provides an opportunity to support both the existing urban core and the rural areas by providing extensions to the urban area and in sustainably located villages. This option also acknowledges that there has been historic inactivity in the provision of new housing within the Inner Urban Core (which has contributed to both Councils' failing to demonstrate a five year housing land supply).	Support for Option 6 is noted.

Reference	Consultee	Consultee Response	Consultee Comments	Officer Comments
SO17/282/1776	The Strategic Land Group	6	Option 6 is the only one that has any reasonable chance of meeting needs in a sustainable manner. Housing and employment land supply requirements should be seen as a minimum not a ceiling figure so to ensure the authority areas achieve the Vision as set out above it is important that the Councils factor in viability and deliverability issues.	Support for Option 6 noted.
SO17/298/1777	John Sanders	6	Our client strongly supports Option 6: 'Combined (Option 4) + Major Urban & Rural Extensions into the Countryside and Green Belt'. Option 5 provides for a higher number of dwellings to be provided during the plan period (49,400 dwellings compared to 41,900 dwellings as proposed in Option 6), the strategy of piecemeal growth spread around the wider urban area would not deliver the Councils' Aims and Objectives of promoting sustainable growth that would be delivered through the strategy of targeting growth within specific urban and rural locations that Option 6 provides. Options 1 - 4 are considered to be unsound on the basis that the level of housing proposed would fall below the OAN figure. Option 6 provides an opportunity to support both the existing urban core and the rural areas by providing extensions to the urban area and in sustainably located villages. This option also acknowledges that there has been historic inactivity in the provision of new housing within the Inner Urban Core (which has contributed to both Councils' failing to demonstrate a five year housing land supply).	Support for Option 6 is noted.
SO17/308/1778	Keele Homes	6	Our client strongly supports Option 6: 'Combined (Option 4) + Major Urban & Rural Extensions into the Countryside and Green Belt'. Whilst Option 5 provides for a higher number of dwellings to be provided during the plan period (49,400 dwellings	Support for Option 6 is noted.

Reference	Consultee	Consultee Response	Consultee Comments	Officer Comments
			<p>compared to 41,900 dwellings as proposed in Option 6), the strategy of piecemeal growth spread around the wider urban area would not deliver the Councils' Aims and Objectives of promoting sustainable growth that would be delivered through the strategy of targeting growth within specific urban and rural locations that Option 6 provides. Options 1 - 4 are considered to be unsound on the basis that the level of housing proposed would fall below the OAN figure. Option 6 provides an opportunity to support both the existing urban core and the rural areas by providing extensions to the urban area and in sustainably located villages. This option also acknowledges that there has been historic inactivity in the provision of new housing within the Inner Urban Core (which has contributed to both Councils' failing to demonstrate a five year housing land supply).</p>	
SO17/309/1779	Keele University	An alternative option	<p>it would be inappropriate for the University to express a preference for a specific spatial option by which the Vision should be delivered. It is a matter for the Local Planning Authority to decide which option best meets the needs of Vision delivery but the choice must be based upon clear evidence and coherent justification. The basic deficiency of Option 5 is that whilst it might avoid intrusion into the green belt, it might involve more scattered forms of development than is desirable in terms of sustainability and service availability. Protection of the green belt at the expense of promoting both scattered development and infrastructure beyond its delineation does not provide a sound basis for policy adoption. Option 6 is capable of delivering the development needs of the preferred scenarios at accessible and sustainable locations but there may be concerns about over-concentrating the</p>	<p>It is noted that the consultee does wish to express a preference regarding the Broad Location Options for future development at this stage.</p>

Reference	Consultee	Consultee Response	Consultee Comments	Officer Comments
			required levels of development in locations which have insufficient physical and social infrastructure.	
SO17/303/1780	Keith Eardley	6	Our client strongly supports Option 6: 'Combined (Option 4) + Major Urban & Rural Extensions into the Countryside and Green Belt'. Option 5 provides for a higher number of dwellings to be provided during the plan period (49,400 dwellings compared to 41,900 dwellings as proposed in Option 6), the strategy of piecemeal growth spread around the wider urban area would not deliver the Councils' Aims and Objectives of promoting sustainable growth that would be delivered through the strategy of targeting growth within specific urban and rural locations that Option 6 provides. Options 1 - 4 are considered to be unsound on the basis that the level of housing proposed would fall below the OAN figure. Option 6 provides an opportunity to support both the existing urban core and the rural areas by providing extensions to the urban area and in sustainably located villages. This option also acknowledges that there has been historic inactivity in the provision of new housing within the Inner Urban Core (which has contributed to both Councils' failing to demonstrate a five year housing land supply).	Support for Option 6 is noted.
SO17/291/1781	Mr Jones	6	Having considered all of the Economic and Housing Broad Location Options, and for the reasons as set out below, we conclude that Option 6 should be the preferred option. The limited, measured and controlled release of a number of sustainable Green Belt sites would be a very sustainable option, and, given the current available supply, and alternative options proposed, on	Support for Option 6 noted.

Reference	Consultee	Consultee Response	Consultee Comments	Officer Comments
			balance, may be unavoidable for this JLP.	
SO17/280/1782	St Modwen Developments Ltd	An alternative option	Preference for an alternative option for 'nodal' growth within the Green Belt, i.e. more focused in a smaller number of large Green Belt and countryside sites than that shown in Option 6. These would be focused around motorway junctions for employment uses (Land adjoining M6 J16 is quoted as a specific example that would cater for 'big box' development). Also more employment sites need to be explicitly identified	Preference for an alternative option which would provide for 'nodal' employment development at major transport interchanges in the Green Belt and wider countryside is noted.
SO17/310/1786	Mr and Mrs Rawlins	6	Our client strongly supports Option 6: 'Combined (Option 4) + Major Urban & Rural Extensions into the Countryside and Green Belt'. Whilst Option 5 provides for a higher number of dwellings to be provided during the plan period (49,400 dwellings compared to 41,900 dwellings as proposed in Option 6), the strategy of piecemeal growth spread around the wider urban area would not deliver the Councils' Aims and Objectives of promoting sustainable growth that would be delivered through the strategy of targeting growth within specific urban and rural locations that Option 6 provides. Options 1 - 4 are considered to be unsound on the basis that the level of housing proposed would fall below the OAN figure. Option 6 provides an opportunity to support both the existing urban core and the rural areas by providing extensions to the urban area and in sustainably located villages. This option also acknowledges that there has been historic inactivity in the provision of new housing within the Inner Urban Core (which has contributed to both Councils' failing to demonstrate a five year	Support for option 6 is noted.

Reference	Consultee	Consultee Response	Consultee Comments	Officer Comments
			housing land supply).	
SO17/315/1787	Mr C and Mrs S Taylor	6	Our client strongly supports Option 6: 'Combined (Option 4) + Major Urban & Rural Extensions into the Countryside and Green Belt'. Whilst Option 5 provides for a higher number of dwellings to be provided during the plan period (49,400 dwellings compared to 41,900 dwellings as proposed in Option 6), the strategy of piecemeal growth spread around the wider urban area would not deliver the Councils' Aims and Objectives of promoting sustainable growth that would be delivered through the strategy of targeting growth within specific urban and rural locations that Option 6 provides. Options 1 - 4 are considered to be unsound on the basis that the level of housing proposed would fall below the OAN figure. Option 6 provides an opportunity to support both the existing urban core and the rural areas by providing extensions to the urban area and in sustainably located villages. This option also acknowledges that there has been historic inactivity in the provision of new housing within the Inner Urban Core (which has contributed to both Councils' failing to demonstrate a five year housing land supply).	Support for Option 6 is noted.
SO17/316/1788	Mr and Mrs E Woodall	no response	We do however believe that options that focus on large scale urban regeneration and housing renewal (i.e. a continuation of current strategy) is no longer sustainable without public sector intervention. Housing delivery has slowed since 2011, when funding from the Government Housing Market Renewal Pathfinder Initiative was pulled. Consequently, to meet the recommended OAN,	Support for Option 6, including a review of Green Belt boundaries and the use of CIL/S106 to facilitate development elsewhere is noted.

Reference	Consultee	Consultee Response	Consultee Comments	Officer Comments
			and to drive economic growth targets, their needs to be a change towards a market housing market led strategy, and therefore we strongly believe Option 6 provides the best approach for meeting the Council's Vision and Aims and objectives for the area. Although Option 6 will involve the release of Green Belt land, national planning policy allows sites to be removed from the Green Belt through the local plan process in "exceptional circumstances". Meeting the housing needs of an area is recognised as being just such an exception, particularly where it has been found that insufficient (non-Green Belt) housing land is available to meet housing needs. With this in mind, it is evident from Newcastle-under-Lyme Borough Council's SHLAA (2017) that there is currently only sufficient land to meet 1.43 years of the recommended OAN for the area. This quite clearly points to the need for the Councils to release Green Belt land. The Councils should therefore undertake a review of Green Belt boundaries to identify sites suitable sites for Green Belt release, and our client would wish for their land interests on the edge of Keele to be considered as part of this process.	
SO17/286/1791	North Planning Loggerheads	An alternative option	The Parish Council would welcome the development of a new strategic option which should incorporate its own OAN from its Neighbourhood Plan, thereby minimising environmental harm and satisfying the needs and requirements of the local community as expressly emphasised in current government legislation.	The alternative option presented is in reference to the overall calculation of housing and employment growth and is specific to the Broad Location Options. Although the representation does include an analysis of the Broad Location Options presented in the consultation document, no preference is expressed and no alternative Broad Location Option is presented.

Reference	Consultee	Consultee Response	Consultee Comments	Officer Comments
SO17/277/1792	HCA	4	It may be appropriate for a green belt review to be undertaken as part of the Local Plan review process.	Support for option 4 noted.
SO17/293/1793	Peter Brett Associates	5 6	It appears from the Consultation Document that Options 5 or 6 (or a hybrid containing elements thereof) will need to be taken forward. According to the consultation documents, meeting the Council's corporate aspirations will require Green Belt release, and the evidence confirms that continuing to rely on a brownfield first policy will not meet need (and indeed will restrict) wider economic growth ambitions. Whichever Option is taken forward, we emphasise that sites close to existing residential uses and community facilities to be released in advance of more peripheral countryside and Green Belt sites. In reality, a good spread of both brownfield and greenfield sites capable of meeting the full range of identified housing needs will be needed, particularly given the significant development viability constraints that continue to affect a number of major brownfield sites. We reiterate that Barratt's application site in Trentham is white land that is not within the Green Belt. Releasing the application site for urgently needed housing at a site that is deliverable in the short term will therefore relieve some pressure on the Green Belt.	Support for Options 5 and 6 are noted.
SO17/285/1795	Lands Improvements Holdings	6	LIH fully supports the principles contained within Option 6: Combined Option 4 + Major Urban and Rural extensions in the countryside and Green Belt. This is the most appropriate option in delivering the required level of growth across the plan area during the plan period, and the only option to propose a suitable approach to housing	Support for option 6 noted.

Reference	Consultee	Consultee Response	Consultee Comments	Officer Comments
			delivery in sustainable locations. This approach would deliver an acceptable supply of housing over the plan period in manner broadly consistent with national guidance. This approach offers sufficient capacity to be refined during later stages of plan preparation and also utilises the early urban and suburban options but in a more flexible and sustainable manner. Given the level of housing needed the Councils must maintain flexibility at this stage of the plan preparation. To restrict options at this stage would fundamentally affect the soundness of the plan going forward.	
SO17/290/1796	Richborough Estates	6	<p>With regard to option 5, the need to release land within the open countryside and Green Belt in order to meet at least the minimum objectively assessed needs is generally supported, however the potential option of having “scattered” development across the open countryside and distributing it broadly, or taking the option of giving all villages outside of the urban area their “fair share” would not necessarily be the most sustainable way of meeting objectively assessed needs, due to consequential unsustainable travel patterns and insufficient infrastructure provision.</p> <p>It is considered that Option 6 would be the best option for distributing the proposed housing and employment growth across North Staffordshire, with specific locations for growth identified that are located in reasonable proximity to existing and proposed infrastructure, the strategic highway network, and existing and proposed locations for employment. It is considered that the land being promoted by Richborough Estates would plug in to the proposed growth of Keele, and would be able to provide a broad range of housing, which could provide affordable housing, market housing, and</p>	Support for Option 6 noted.

Reference	Consultee	Consultee Response	Consultee Comments	Officer Comments
			potentially also housing for graduates, research students and university professionals. The provision of higher quality / aspirational homes in particular would align well with the Science and Innovation Park.	
SO17/289/1797	Trustees of Thomas Wilshaw Estate	6	Concerns over the housing land supply in the City, as well as the adjoining Staffordshire Moorlands. Baddeley Green should be looked at for further development in the Green Belt.	Support for Option 6 noted.
SO17/288/1798	Stoke-on-Trent City Council (Housing)	no response	A core area of our work does focus on the urban core and this would be supported by option 2 delivering a higher density, centres based approach which would prioritise brownfield development. However an objective of the Housing Strategy is to deliver a broad housing offer for each stage of life. This will include delivery across a range of environments and locations. A particular example of this is increasing the Council Tax base, encouraging wealth creators to the City through Custom & Self Build, and building high quality homes and larger family homes. These products are better delivered in higher value suburban markets. Our programmes have a varying spatial emphasis that does not focus solely on the traditional urban core. We currently have schemes that are looking at suburban sites in locations such as Meir, Caverswall, Blurton and Trentham. On this basis a spatial strategy that allowed for a combined approach, such as that demonstrated in option 4 would deliver the objectives of the housing programmes. We believe option 5 would deliver unacceptable unplanned development in the Greenbelt and would put at risk the focussed efforts of our work in the urban and suburban core.	Support for Broad Location Option 4 is noted.

Reference	Consultee	Consultee Response	Consultee Comments	Officer Comments
SO17/307/1799	SOT Regeneration Ltd and Mr Poole	6	It is considered that Option 6 would be the best option for distributing the proposed housing and employment growth across North Staffordshire, with specific locations for growth identified that are located in reasonable proximity to existing and proposed infrastructure, the strategic highway network, and existing and proposed locations for employment. With regard to specific locations for growth and Green Belt release, Stoke-on-Trent Regeneration Limited and Mr J. Poole are particularly supportive of the suggested growth area identified to the south of the City at Lightwood, and believe that there is an economic case, as well as a case for meeting objectively assessed housing needs for delivering growth in this location in order to justify the release of Green Belt land.	Support for Option 6 is noted
SO17/318/1800	St Modwen Developments Ltd, Stoke-on-Trent Regeneration Ltd and St Modwen Securities Ltd	An alternative option	The preferred development distribution strategy should address the requirement within the Vision to be a great place to live and work, while protecting existing assets which includes diversifying the employment base and ensuring a balanced housing choice which addresses general and aspirational need. This will require a distribution strategy that looks at not only targeted regeneration but looks forward to creating modern aspirational neighbourhoods attractive to the existing population and to potential new residents. To that extent the Distribution Strategy must combine the broadest choice of locations to provide as broad a range of housing as possible to address cost concerns as well as providing for lifestyle choices. A broad range of employment sites is also necessary to enable all employment opportunities to be captured. This would be an Option which combined Targeted Regeneration, Urban, Suburban and Major Urban & Rural Extensions in	Preference for an alternative option that combines Targeted Regeneration, Urban, Suburban and Major Urban & Rural Extensions in the Countryside and Green Belt is noted.

Reference	Consultee	Consultee Response	Consultee Comments	Officer Comments
			the Countryside and Green Belt.	
SO17/306/1801	Staffordshire County Council	An alternative option	Without greater clarity over the allocations that may become the preferred option, we therefore cannot state a preference for the broad locations of future development. The nature of the portfolio of employment land in terms of quality, location and potential use-class is likely to affect our preference. We do however feel that given that options five and six are the only viable options considered at the moment, a greater range of potential options may be required when considering the development in rural parts of the area.	No preference regarding the Broad Location Options is noted. Wider comments regarding the deliverability of sites for development will be considered as work on the Joint Local Plan progresses.
SO17/297/1802	Stephen Beaumont	6	Our client strongly supports Option 6: 'Combined (Option 4) + Major Urban & Rural Extensions into the Countryside and Green Belt'. Whilst Option 5 provides for a higher number of dwellings to be provided during the plan period (49,400 dwellings compared to 41,900 dwellings as proposed in Option 6), the strategy of piecemeal growth spread around the wider urban area would not deliver the Councils' Aims and Objectives of promoting sustainable growth that would be delivered through the strategy of targeting growth within specific urban and rural locations that Option 6 provides. Options 1 - 4 are considered to be unsound on the basis that the level of housing proposed would fall below the OAN figure. Option 6 provides an opportunity to support both the existing urban core and the rural areas by providing extensions to the urban area and in sustainably located villages.	Support for Option 6 is noted.

Reference	Consultee	Consultee Response	Consultee Comments	Officer Comments
SO17/279/1805	Lichfields	2	<p>Intu is generally supportive of all five issues and particularly Issue 1 (Retail Hierarchy), Issue 2 (Vitality, Viability and Vibrancy of Centres) and Issue 3 (Potential for Future Development). However, it is important that the issues identified are fully addressed in other parts of the Joint Local Plan. Appendix 1 – City, Town, Local and Other Centres, Issue 3: Potential for Future Development (page 62) sets out that the evidence in the Stoke-on-Trent Retail & Leisure 2014 study makes a number of suggestions regarding the future allocation of retail floorspace. Whilst we welcome some aspects of the study it is noteworthy that as far as matters dealing with the City Centre are concerned the advice received is now out-of-date and things have moved on considerably, such that an update is required. Notwithstanding the above we agree with the recommendation that given the importance of the City Centre to the wider city region, the strategy approach for the city should be to focus and direct new comparison goods floorspace towards the City Centre as first preference. Strategic Aim 18 (page 66) seeks to promote mixed use and residential development where it can support city, town and local centres. Intu supports this approach which reflects its own experience across the country and in its recent investment in The Hive.</p>	Support for option 2 noted.
SO17/314/1808	Urban Vision North Staffordshire	An alternative option	<p>None of the options presented are likely to be a 'preferred option'. Options 1, 2 and 3 should be discounted as these will not be NPPF compliant, and whilst there are clearly elements of each of the other three options that have merit, it is clear that further thought needs to be given to how these would translate as an overall spatial strategy.</p>	The alternative option to focus development on economically driven projects is noted.

Reference	Consultee	Consultee Response	Consultee Comments	Officer Comments
SO17/357/1809	Gladman Developments	6	Gladman considers that Option 6 is the most realistic and deliverable of the scenarios outlined in the consultation document. Whilst development on this scale will require careful consideration of such issues as environmental impact, infrastructure provision and green belt review, Gladman does not consider that there are any unsurmountable constraints with this approach which would prevent the level of growth envisaged being delivered. The option sensibly allows for the regeneration of core areas of the Stoke/Newcastle conurbation without an overreliance on brownfield land to deliver the housing requirement. The variety of locations and the potential to allow a variety of site sizes, will open up the residential market to all housebuilders, be they small medium or large. Only through engaging all aspects of the industry with a wide range of sites will it be possible to meet the needs of the plan area. The apportionment of housing growth to the smaller rural settlements will support those services and facilities that already exist in those settlements in accordance with the NNPF which, in paragraph 55, advises that "housing should be located where it will enhance or maintain the vitality of rural communities."	Support for Option 6 is noted.
SO17/350/1810	Highways England	1 2	Highways England's first preference is for more contained development close to existing urban centres but recognise that this is not likely to deliver the levels of development required. Second preference is Options 4 or 6 where development can still be concentrated in certain locations (e.g. rural settlements and urban extensions). These options will require further transport analysis (modelling) and consideration of other wider pressures identified in the Route Investment Strategy and through Duty to Cooperate	Support for Options 1 or 2 as the first preference, but potentially Options 4 or 6 as a second preference with appropriate transport analysis and infrastructure improvements is noted. Highway improvements that will be required to be delivered to support the preferred levels and locations of development will be identified and addressed as work on the Joint Local Plan progresses and an Infrastructure Delivery Plan will be prepared in support of the plan. The councils welcome further dialogue with Highways England and adjoining

Reference	Consultee	Consultee Response	Consultee Comments	Officer Comments
			discussions.	local authorities to identify the highway improvements required, under the Duty to Cooperate.
SO17/354/1812	Graham and Sylvia Rowe	4	In agreement with development outlined in 4) above but strongly opposed to any material overflow onto the green belt which should be resisted as far as possible.	Support for Option 4 is noted.
SO17/352/1814	Mrs M.A. Wareham	1	Definitely no development in the green belt. Every effort should be made to develop the many brown field sites in the area.	Support for Option 1, protection of the Green Belt and prioritisation of brownfield sites is noted.
SO17/347/1815	Carl Edwards	6	Option 6 provides an opportunity to support both the existing urban core and the rural areas by providing extensions to the urban area and in sustainably located villages. This option also acknowledges that there has been historic inactivity in the provision of new housing within the Inner Urban Core (which has contributed to both Councils' failing to demonstrate a five year housing land supply). Whereas there are more viable and deliverable sites in other sustainable locations which reflect the demand for housing in the area (most notably on sites located on the edge of the Urban Area and sites focused within Newcastle-under-Lyme). This strategy will facilitate the carefully managed provision of new housing and employment land through urban extensions and sustainable developments in the Green Belt. By choosing this option, there would be a greater appetite to build houses within the Market Housing Area, which would in turn provide the Councils with an opportunity to demonstrate a five year housing land supply and thus have more control during the plan period to guide the location of new housing	Support for Option 6 and the need for a review of Green Belt boundaries is noted.

Reference	Consultee	Consultee Response	Consultee Comments	Officer Comments
			development as opposed to being forced to accept ad-hoc housing schemes throughout the area. Furthermore, the provision of a range of both larger and smaller housing allocations can provide an opportunity for a range of housing developments to come forward during the plan period to suit the wide ranging settlements. This will in turn provide opportunities to deliver the level of affordable housing, supporting infrastructure and community facilities that both Councils are seeking to achieve during the plan period.	
SO17/355/1816	Mrs S Y Cornes	2	Support for Option 2	Support for Option 2 noted.
SO17/356/1817	Pat Lee	4	This option maximises the existing developments, whilst has a minimum impact on the surrounding countryside and green belt areas.	Support for Option 4 noted.
SO17/348/1819	Muller Property Group	no response	Option 4 is a suitable and sustainable development strategy that does not require Green Belt land release. On the basis that Option 4 is suitable and sustainable in all respects, exceptional circumstances do not exist to justify Green Belt land release. In addition, a "scattered" approach to the distribution of development is not in conformity with either the emerging Plan or the Framework aspirations. New development should be located in locations that have good access to services and facilities. This will not be achieved by directing development to "scattered" rural areas where such services and facilities do not exist. Option 6 - Combined Option 4 and Major Urban and Rural Extensions in the Countryside and Green Belt, is also flawed. It is inappropriate for urban extensions	Support for Option 4, providing a greater range and mixture of housing sites and development types whilst protecting the Green Belt, is noted.

Reference	Consultee	Consultee Response	Consultee Comments	Officer Comments
			to be directed to Green Belt locations as, for reasons stated above, there is a deliverable housing and employment growth strategy that does not require Green Belt land release (Option 4). As a consequence very special circumstances do not exist to support Green Belt land release. We are, however, of a view that the directly urban extensions to the Rural Service Centres in the open countryside outside of the Green Belt would be appropriate. For example, directing additional new development to Loggerheads would be entirely appropriate through an evolution of this option.	
SO17/349/1821	Sam Loweth	4	Maintain countryside - don't build on it.	Support for Option 4 and maintaining the countryside is noted.
SO17/353/1823	Whitmore Parish Council	2 3	Three further core objectives for the rural area should be: - a requirement that any significant increase in size of villages must be accompanied by the provision of increased/improved local facilities. WPC has to date seen absolutely no evidence of the BC making any attempt to do this in our rural area - an increase in the percentage of new build that is required to be Affordable housing - a greater weight in choice of development sites should be given to minimise the need for vehicle journeys.	Support for Options 2 and 3 noted. The Final Joint Local Plan will be supported by an Infrastructure Delivery Plan (IDP) which will incorporate the identified need for new or improved facilities to support future development and the mechanisms required to deliver them. Affordable housing policies will be included in the Draft and Final Local Plans and will be based on evidence relating to need (identified primarily within the SHMA) and deliverability (primarily evidence relating to the viability of providing affordable housing within private market development schemes).
SO17/646/1824	Neale Sheldon	2	Totally disagree with building in countryside areas such as Baldwins Gate. because villages such as this do not have the capacity in the local primary school in particular. There are plenty of old brownfield sites near the city that could be developed	Support for Option 2 and brownfield development in the urban area is noted. It is very unlikely that the Joint Local Plan could be adopted with no development in countryside areas as this would mean that localised housing needs will not be met. Development across the plan area will have to be

Reference	Consultee	Consultee Response	Consultee Comments	Officer Comments
				supported by appropriate infrastructure (including educational facilities) and an Infrastructure Delivery Plan (IDP) will be prepared to support the Final Local Plan to ensure that this can be delivered.
SO17/647/1825	Stephanie Evans	6	You need to build more houses in Newcastle-under-Lyme if you want to attract new companies to the area and create more employment. If that means building on green belt then you need to do a Green Belt assessment review.	Support for Option 6 noted. The councils recognise the need to consider Green Belt boundaries and have commissioned a Green Belt Review to address this.
SO17/648/1826	Steven Malam	1	Support for Broad Location Option 1	Support for Broad Location Option 1 noted.
SO17/649/1827	Theatres Trust	Don't know / unsure	Don't know / unsure	Uncertain response noted.
SO17/650/1828	Jill Freeman	Don't know / unsure	I don't know what they are.	The Broad Location Options are set out in Section 6 of the Strategic Options Consultation document. Each option is accompanied with supporting text and illustrations to explain what the options are and what their implications might be. Officers from either council would have been (and continue to be) happy to explain to you what the options are and what they might mean.
SO17/651/1829	Michael Hall	no response	This is the best option in my opinion, it allows for some development within existing villages while protecting the green belt, once we have lost the green belt it has gone forever. One key issue with developing villages too much (as we have seen in Baldwins Gate) is that there is insufficient infrastructure (schools, GP surgery, roads etc.) to support this scaled of development, all the Council is doing is storing up issues for the future, where are the school places going to come from? where	Support for Option 4 and the prioritisation and delivery of brownfield land are noted.

Reference	Consultee	Consultee Response	Consultee Comments	Officer Comments
			are the new residents going to go if they need a GP? This is not NIMBY it's just common sense. All development and the services that people expect need to be sustainable, achievable & realistic. I think more emphasis should be placed on the development of brownfield sites, with incentives to building companies / developers to develop these sites before green belt sites. Work with the large building companies / developers and package up several brownfield areas of land, if during the land survey process contamination issues are encountered e.g. Japanese knotweed etc. work with the builders/developers to ensure you can help them. Work as a partnership in some way so the financial risk associated with contaminated land is shared, this would encourage better development in Stoke and Newcastle and encourage the redevelopment of brownfield sites which are normally within areas that have good road transport links, schools, GP surgeries etc.	
SO17/652/1830	The Connecting Tracks Project	Don't know / unsure	Because of the HS2 route I feel special attention needs to be given to environmental screening and noise pollution in the Joint Local Plan	It is recognised that HS2 will have implications on the plan area, but any resulting effects are most likely to occur towards the end of the plan-period. At the moment the route is confirmed and a narrow safeguarding strip either side of the proposed route has been identified. The Local Planning Authority is required to notify HS2 of any planning applications in that area. Whilst the construction of the HS2 line is outside the role of both local authorities, it may be appropriate for the Joint Local Plan to consider policies relating to screening and noise pollution that can be applied to all forms of development.

Reference	Consultee	Consultee Response	Consultee Comments	Officer Comments
SO17/653/1831	Andrew Wickens	Don't know / unsure	Don't know / unsure	Uncertain response noted.
SO17/654/1832	Richard Nicholl	4	<p>This option will utilise existing brown field areas and by imaginative and constructive use of this land, such as using increased building height to maximise the use of the limited land available. It will also place the industrial units and houses close to where people want to be. Transport costs and volumes will only increase in the future. We do not have the green land available for additional development or the infrastructure that would be needed to accompany it. Agriculture needs to remain a core business in the UK as if the population is increasing the so will be its demand for more food, and if you take the land away we will have to rely on imported food and carbon based energy supplies, which is a dangerous situation for the country to be exposed to, especially when it is unnecessary. Scattered development, as suggested in options 5 and 6 is inefficient and would soak up more and more valuable and irreplaceable farmland, as inevitably the land in-between 'scattered developments' quickly becomes infill and available for even further development. Increasing housing or employment areas in the rural outer extremes of our area will help the surrounding local authorities rather than those of Stoke and Newcastle, increasing the influx we have already seen from Manchester, Birmingham, Telford and Wolverhampton. This also leads to housing price increases alienating our existing locally born population. A 'natural' barrier to the south of the region, however, could be the new HS2 railway line.</p>	Support for Broad Location Option 4 noted. Further matters raised such as increased building heights will be considered as part of preparing detailed policies within the Draft Local Plan.

Reference	Consultee	Consultee Response	Consultee Comments	Officer Comments
SO17/655/1833	Donald Butterworth	5 no response	It is noted that Options 1: to 4: do not comply with the NPPF and this is a serious and significant failure to recognise the implications within the context of the Consultation Document. Evidence gathered by Loggerheads Parish Council with their Housing Needs Assessment suggests the most suitable is Option 5: although with limits applied to rural areas based upon quantified evidence. The Joint Borough and City Councils need to take into account the Housing Needs Assessment for three Neighbourhood Plan Areas completed so far covering approximately 50% of the NULBC Area: Whitmore, Maer & Aston & Chapel Chorlton + 10 max, Keele + 4 max, Loggerheads + 20 max. In the absence of any quantifiable evidence for other rural areas these could be used as rough guide for calculating housing needs.	The broad locations set out within the strategic options document shows the potential capacities within each option, rather than how much each option will deliver. The Joint Local Plan will look to allocate a range of sites that both regenerates the area as well as delivering the housing need across the area in accordance with the strategy. Each site will be considered accordingly on its own merits.
SO17/656/1834	Paul Baddeley	2	Concentration on urban centres is essential - it will build critical mass. City Centre will be served easily by public transportation and traffic can be managed better (at present everyone want to go in different direction almost everywhere causing problems for junctions and buses nor being to satisfy demand and being stuck in traffic Need to consider transportation - huge opportunities for employment and housing around Longport rail station (including Tunstall area). We could have development in green belt to the west to provide high end housing whilst all other housing is focused around town centres	The Joint Local Plan will look to allocate a range of sites that both regenerates the area as well as delivering the housing need across the area in accordance with the strategy. Each site will be considered accordingly on its own merits. The Local Plan will be accompanied by an Infrastructure Delivery Plan (IDP) that will ensure that infrastructure is provided in an appropriate and timely manner to support the delivery of development.
SO17/657/1835	Loggerheads Parish Council	An alternative option	The Parish Council would welcome, therefore, the development of a new strategy which should incorporate its own OAN from its Neighbourhood Plan, thereby minimising environmental harm and	The SHMA document sets out a robust methodology for working out the OAN for the Local Plan area. The Councils have set out a strategy to meet this as the NPPF requires us to plan

Reference	Consultee	Consultee Response	Consultee Comments	Officer Comments
			satisfying the needs and requirements of the local community as expressly emphasised in current government legislation. You must make use of housing needs assessments for 3 Neighbourhood Plan Areas completed so far (covers 50% of area of borough) : Whitmore, Maer & Aston & Chapel Chorlton +10 max, Keele +4 max , Loggerheads +20 Max. Could use these as basis for rough calculations for other rural parishes.	positively to meet the OAN. The Government is currently running consultation on a standardised methodology for working out the OAN, the Council will need to take account of this as it is formalised. The Joint Local Plan will look to deliver sustainable development including allocating a range of sites that both regenerates the area as well as delivering the housing need across the area in accordance with the strategy. Each site will be considered accordingly on its own merits.
SO17/658/1836	Adri Hartveld	2	Support for option 2	Support for option 2 is noted.
SO17/659/1837	Karl Deakes	2	Support for option 2	Support for option 2 is noted.
SO17/660/1838	Catherine Salt	4	If some of the Brexit predictions are correct then agricultural land will be worth more to us as imported food prices increase. Therefore maintaining agricultural land whilst creating homes in a variety of locations is a good compromise	Support for option 4 is noted. There is insufficient evidence on any likely impacts from exiting the EU and therefore cannot be taken into account at this stage; however in terms of protecting the best and most versatile agricultural land (BMV) the NPPF requires Local planning authorities to take into account the economic and other benefits of BMV. Where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality.
SO17/661/1839	Mr and Mrs Phillips	2	Definitely not options 5 and 6. Scattered development would provide fewer houses and impair the opportunity to protect green belt and agriculture.	Support for Option 2 is noted along with your opposition to developing into the green belt. There is policy protection for the green belt and the best agricultural land, through the NPPF. The NPPF

Reference	Consultee	Consultee Response	Consultee Comments	Officer Comments
				states that Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of a Local Plan. In terms of protecting the best and most versatile agricultural land (BMV) (Grades 1, 2 and 3a) the NPPF requires Local planning authorities to take into account the economic and other benefits of BMV. Where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality.
SO17/662/1840	Carlton Woolley	1 2 3 4	Development of greenbelt is a lazy option	Opposition to going into the Green Belt is noted.
SO17/663/1841	Natural England	Don't know / unsure	Natural England does not have a specific preference for any of the six strategic options. However we would favour locations for development which avoid areas of high environmental value such as designated sites and landscapes in accordance with the NPPF.	The SHLAA and site selection will take into account this information on the sites.
SO17/664/1842	Jacqueline Karen Reynolds	2 3	Options 5 and 6 are totally wrong we should be protecting these areas not destroying them. Scattered development provides less houses overall which defeats the objective. What happens to the already diminishing wild life in the countryside. Environmental incentives are discussed by government and local councils however by decreasing these areas must have a negative impact. Many of our local wildlife are becoming endangered as we speak to consider using agricultural and green belt for building land	Support for options 2 and 3 are noted.

Reference	Consultee	Consultee Response	Consultee Comments	Officer Comments
			would be even more detrimental.	
SO17/665/1843	Lynne Woolley	2 3	Support for options 2 and 3.	Support for options 2 and 3 are noted.
SO17/666/1844	John Lamont	2	Support for option 2 with the urban areas and brownfield sites being prioritised.	Support for option 2 and comments are noted.
SO17/667/1845	Janet Lamont	2	Option 2 - Urban areas have existing infra structure such as transport, shops, and schools.... to provide for additional housing. Priority / incentives should be given to develop old disused industrial or housing sites where such development would improve the area. If urban re-generation does not provide enough housing sites then a combination of 2 & 3 should be used with suburban extension only as second choice when all urban regeneration has been identified. Suburban growth should only be allowed where there is guaranteed infra structure improvement such as increase in bus provision to limit the increased use of the car.	Support for option 2 and the comments are noted.
SO17/668/1846	Sport England	no response	No comment other than ref. to protecting, enhancing and providing indoor and outdoor sports facilities	The Local Plan will be accompanied by an Infrastructure Delivery Plan (IDP) that will ensure that infrastructure is provided in an appropriate and timely manner to support the delivery of development. This includes sports facilities.
SO17/669/1847	M Davies	Don't know / unsure	Don't know / unsure.	No preference noted.

Reference	Consultee	Consultee Response	Consultee Comments	Officer Comments
SO17/670/1848	Staffordshire Chambers of Commerce	6	The Chamber fully appreciates the concerns of local authorities and residents in relation to maintaining the Green Belt, however, to achieve the population and growth plans, there is little choice but to recognise that some areas of Green Belt will need to be developed because it cannot all be accommodated appropriately on Brownfield Land, both in terms of space and to get effective economic value from any housing development. We would also expect to see a 'red-carpet' approach to large house building companies enabling them to build high value, executive housing and develop Green Belt sites.	The support for option 6 is noted. As the Local Plan emerges, further information on sites will be consulted on.
SO17/671/1849	Keele Parish Council and Neighbourhood Plan	An alternative option	It is our conclusion that the final JLP will need to be based upon another option which is specific about the nature of any development in the rural/ greenbelt areas, plans to meet the OAN and not exceed it and which addresses the infra-structure development which will be necessary to support its sustainability. Any preferred development options should also include potential additional infrastructure to meet and service the development areas proposed. In addition, the new option would need to clearly define what changes are planned to greenbelt and development within it, rather than offer it to any prospective development.	The broad locations set out within the strategic options document shows the potential capacities within each option, rather than how much each option will deliver. Therefore Option 5 would not deliver 49400 dwellings, it is rather that it has capacity for that many. The Joint Local Plan will look to allocate a range of sites that both regenerates the area as well as delivering the housing need across the area in accordance with the strategy. Each site will be considered accordingly on its own merits.
SO17/672/1850	Peter Jones	1	Support for option 1.	Support for option 1 is noted.
SO17/673/1851	Angela Clarke	An alternative option	Stop building on all our green space.	The Joint Local Plan will look to allocate a range of sites that both regenerates the area as well as delivering the housing need across the area in accordance with the strategy. Each site will be

Reference	Consultee	Consultee Response	Consultee Comments	Officer Comments
				considered accordingly on its own merits.
SO17/674/1853	Packmoor Residents Association	4	More employment sites on green belt if necessary. A comprehensive portfolio is needed to attract businesses, They are out there and want to come, just give them the sites!	The comments are noted. The Local Plan will include information on the phasing of development. The Councils will however have to maintain a 5 year supply throughout the plan period.
SO17/675/1854	Wenslie Naylor	4	Support for option 4.	Support for option 4 is noted.
SO17/676/1855	Stephen Peake	1	Support for Option 1.	Support for option 1 is noted
SO17/677/1856	Sue Sandywell	4	Support for option 4.	Support for option 4 is noted.
SO17/678/1857	Jennifer Cook	Don't know / unsure	Don't know / unsure	N/A
SO17/679/1858	Kidsgrove Independents	An alternative option	Support for an alternative option.	Support for an alternative option is noted.
SO17/680/1859	Audley Rural Parish Council	An alternative option	Overall the Parish Council recognise the need to increase the housing land supply across the Borough, and within the overall plan area, in order to meet the OAN, but they would not support seeking to exceed this OAN by setting unrealistic targets at the expense of the Countryside and Green Belt. It is questionable as to why there is no	The broad locations set out within the strategic options document shows the potential capacities within each option, rather than how much each option will deliver. The Joint Local Plan will look to allocate a range of sites that both regenerates the area as well as delivering the housing need across the area in accordance with the strategy. Each site

Reference	Consultee	Consultee Response	Consultee Comments	Officer Comments
			option available which actually meets the OAN, only options that are significantly higher or below.	will be considered accordingly on its own merits. The Local Plan will be accompanied by an Infrastructure Delivery Plan (IDP) that will ensure that infrastructure is provided in an appropriate and timely manner to support the delivery of development.
SO17/681/1860	Alderman David Becket	An alternative option	<p>This is the most unsatisfactory aspect of the plan. Six options for land use are offered, but none match the housing and employment land figures in scenarios A, B, C, and D.</p> <p>A joined up plan should offer the Housing and Employment growth options and then provide land use options for each growth scenario. Assuming headline figures of 27,800 houses and 199ha of employment land (which equate to scenario C) then 1,2,3,4. Do not provide enough houses and also give too much/too little land. 5 and 6 provide more land and houses than required.</p> <p>Option 5 would release scattered house building all over the borough and would be a disaster for the environment and any attempt at sustainability.</p> <p>We are therefore left with a reduced option 6, removing land at Ashley, Loggerheads, Madeley, Madeley Heath, Audley. Bunny Hill, The Butts, Keele Bank, the expanded area of Chatterley Valley. It should include an area around Eardley/Foxley.</p>	<p>The Joint Local Plan will look to allocate a range of sites that both regenerates the area as well as delivering the housing need across the area in accordance with the strategy. Each site will be considered accordingly on its own merits.</p> <p>The Local Plan will be accompanied by an Infrastructure Delivery Plan (IDP) that will ensure that infrastructure is provided in an appropriate and timely manner to support the delivery of development.</p>
SO17/682/1861	Alan Kinnersley	2	Any economic or housing development in rural villages, open countryside or Green Belt has an impact, usually adverse, on schools & school transport, medical, nursing & ambulance services,	The Joint Local Plan will look to allocate a range of sites that both regenerates the area as well as delivering the housing need across the area in accordance with the strategy. Each site will be

Reference	Consultee	Consultee Response	Consultee Comments	Officer Comments
			<p>gas, water & electricity supply, effluent disposal, refuse collection & recycling, Broadband & cable services and public transport to say nothing about the loss of amenity. The cost of such impact has to be met by the wider community.</p> <p>The roads or lanes in such locations are often more suited to horse traffic than petrol, diesel or electric vehicles.</p>	<p>considered accordingly on its own merits.</p> <p>The Local Plan will be accompanied by an Infrastructure Delivery Plan (IDP) that will ensure that infrastructure is provided in an appropriate and timely manner to support the delivery of development.</p>
SO17/683/1862	Newcastle under Lyme Liberal Democrats	Don't know / unsure An alternative option	<p>We have ticked the two boxes, because we are NOT happy with any of the 6 options as presented.</p> <p>The nearest to our vision would be option 2 + taking the urban extensions idea of option 6, but leaving out most of the suggestions in option 4. This would also come nearest to assessed need as described.</p> <p>Option 6 identifies too many little scattered developments in rural areas and far exceed the assessed needs. Option 5 is NOT A PLAN, while options 1,2,3 and 4 are below the assessed needs.</p> <p>Account MUST also be taken of opportunities for jobs in adjacent areas and the corresponding need to build sustainably and take account of transport, roads and rail.</p>	The comments are noted. The maps contained within the Strategic Options document are a purely indicative method of showing where growth could go under each of the options. The Joint Local Plan will look to allocate a range of sites that both regenerates the area as well as delivering the housing need across the area in accordance with the strategy. Each site will be considered accordingly on its own merits.
SO17/684/1863	Janet Burgess	1	Leave Green belt alone we have so little room to relax as it is.	Support for Option 1 is noted.
SO17/685/1864	Ms Finney	An alternative option	Support for an alternative option.	Support for an alternative option is noted.

Reference	Consultee	Consultee Response	Consultee Comments	Officer Comments
SO17/686/1865	Glenis Woodcock	1	I feel that for Kidsgrove this is the only way forward for Kidsgrove I have lived in Kidsgrove all my life was born here and since Newcastle took over I am ashamed of living here this council has spoiled a great little town think about what you are doing.	The Joint Local Plan will look to allocate a range of sites that both regenerates the area as well as delivering the housing need across the area in accordance with the strategy. Each site will be considered accordingly on its own merits.
SO17/687/1866	Madeley Parish Council and Neighbourhood Plan Steering Group	4 An alternative option	<p>The Parish Council would therefore welcome the adoption of a new Option 7 strategy which would incorporate its own OAN from its Neighbourhood Plan (and the OANs from other Neighbourhood Plans, which are of course founded upon the wishes of the local community), thereby minimising environmental harm and satisfying the needs and requirements of the local community, as expressly emphasised in current government legislation (4). We urge the Borough and Stoke-on-Trent to adopt the most realistic, least over-optimistic Strategic Option which would satisfy governmental demands, in order to secure the Local Plan.</p> <p>As an integral part of the new Option 7, we would in particular request the two authorities to look hard at their urban edges, and where those edges could be expanded outwards (and in some cases significantly so) to accommodate new development, thereby supporting sustainable travel patterns and avoiding having to leap frog development into far less sustainable locations, such as the rural service centres.</p> <p>The Parish Council would welcome the adoption of a new Option 7 strategy which would incorporate its own OAN from its Neighbourhood Plan (and the OANs from other Neighbourhood Plans, which are of course founded upon the wishes of the local community), thereby minimising environmental harm and satisfying the needs and requirements of</p>	The NPPF states that the housing need be met in full across the HMA. The Joint Local Plan will look to allocate a range of sites that both regenerates the area as well as delivering the housing need across the area in accordance with the strategy. Each site will be considered accordingly on its own merits.

Reference	Consultee	Consultee Response	Consultee Comments	Officer Comments
			the local community, as expressly emphasised in current government legislation. We urge the Borough and Stoke-on-Trent to adopt the most realistic, least over-optimistic Strategic Option which would satisfy governmental demands, in order to secure the Local Plan.	
SO17/688/1867	Ray Williams	1	Support for option 1.	Support for option 1 is noted.
SO17/689/1868	FUCHS Lubricants (UK) plc	5 no response	This option will deliver potentially the most houses and employment land whilst not removing the ability to support the regeneration of the urban area, like in option 6.	Support for option 5 is noted.
SO17/690/1869	Gwyn Griffiths	An alternative option	Once again - evidence base opaque. Option 4 may be the most appropriate but with review of inner edge of Green Belt rather than rural village development.	Support for Option 4 with some potential Green Belt release is noted.
SO17/691/1870	Stafford Borough Council	4	Broad Locations for Future Housing & Economic Development, the Borough Council's preferred approach is Option 4 – combined urban, suburban and rural villages as this would avoid exceptional circumstances having to be demonstrated for Green Belt release, continue to facilitate the delivery of brownfield sites close to transport nodes in the urban areas whilst facilitating a mix of urban and rural housing solutions to deliver economic growth. Clearly implementation of the strategy will need to ensure delivery of brownfield sites in the urban areas whilst protecting the high quality environments across the Joint Local Plan areas. The adopted Plan for Stafford Borough 2011-2031 delivers a strategy for new development which does not make any amendments to the Green Belt	Support for option 4 is noted.

Reference	Consultee	Consultee Response	Consultee Comments	Officer Comments
			within the Borough.	
SO17/645/1872	Cynthia England	An alternative option	Combine 1 & 2, with VERY limited rural village development. Very much object to incursions into the countryside & green belt: unless brownfield sites: not meeting your stated objectives in terms of embracing & protecting the natural environment. Am unhappy with any other than very small new residential development in rural villages: it is not meeting you objective of 'embracing historic & built environment & natural environment	Alternative option noted. The potential to limit development in the countryside and Green Belt must be balanced against the ability of both authorities to accommodate development within their urban areas. This is dependent on having sufficient deliverable and developable sites with enough capacity to meet the identified needs. If sufficient land is not available in the urban areas then further development opportunities must be explored in the countryside and in the Green Belt, or in adjoining local authority areas if Duty to Cooperate discussions identify that some can be accommodated there.
SO17/745/1873	Araripe Limited	6	It's difficult to deliver the required development in the urban area and therefore the Green Belt should be used with policies to mitigate the impact.	National policy is clear on the need for exceptional circumstances being required for delivery of development in the Green Belt. The Council's will continue to investigate when this is met.

Additional Comments

Reference	Consultee	Consultee Comments	Officer Comments
SO17/52/1729	Gary Picken	Concerns over speculative development under options 3 to 6.	The Joint Local Plan will look to allocate a range of sites that both regenerates the area as well as delivering the need.
SO17/98/1741	David Bourne	Stoke-On-Trent is doing well, don't let old habits hold us back. Lose the 6 town mentality, concentrate resources where they will achieve the best results.	Comments Noted
SO17/70/1742	Dennis Weston	There is a need to deliver a mix of housing types over a mix of locations.	The Local Plan will look to meet housing need across the whole local plan area.
SO17/68/1743	Malcolm Clowes	Finally. Thank you for considering these responses. I look forward to continuing to inform the evolution and content of this plan especially to ensuring that the plan is positive and seeks to truly transform the area and to serve as a clear indicator to the private sector where their investment will be encouraged and supported.	Support Noted
SO17/100/1745	The Woodland Trust	Please consider also the comments which we made at the Options stage of the consultation.	Comments are noted
SO17/99/1747	Robert Almond	I wish to present the view that high priority is given to protecting and maintaining green space areas within both the urban and suburban districts. This will ensure that residents (and workers) will have access to an important recreational facility which will improve health/wellbeing and ultimately reduce financial demands on the health services	Comments noted and agreed. The councils have produced up to date evidence with regard to greenspace and we seek to ensure that the best quality greenspaces are retained now and for future generations; in line with the Joint Local Plan objectives.
SO17/69/1748	Newcastle-under-Lyme Borough Council (Regeneration)	Promotion of land adjoining the former Golf Course at Keele for development.	The site is recognised to be in the Green Belt. The Local Plan will need to consider the exceptional circumstances required to release a green belt site should it be required.
SO17/321/1751	Anthony McNicol	The Local Plan should aim to bring brownfield sites back into use and remediate contaminated sites.	The Joint Local Plan will look to allocate a range of sites that both regenerates the area as well as delivering the housing need.
SO17/341/1753	Aspire Housing	Government grant funding to Aspire to build new	The need for affordable homes is recognised and the

Reference	Consultee	Consultee Comments	Officer Comments
		affordable homes has been massively cut in real terms through the last spending review. Given the extensive waiting lists for affordable housing within the Borough, Aspire needs to be innovative in order to continue building affordable homes. As a result the Aspire Group is actively seeking opportunities to develop its own land sites, the majority of which are brownfield and in predominantly urban neighbourhoods, either for the direct provision of affordable housing or to generate capital receipts that will be recycled into providing new affordable homes.	Local Plan will set out an approach for delivering this. Sites that have been submitted as part of a call for sites for inclusion in the SHLAA will be considered within the process.
SO17/340/1755	Betley, Balterley & Wrinehill Neighbourhood Plan Steering Group and Parish Council	<p>In conclusion, the Steering Group (Parish Council) feels that to help it to prepare its Neighbourhood Plan the following issues will need to be addressed and for the Borough Council to explain: -</p> <ul style="list-style-type: none"> • The assumptions behind the OAN calculations to enable our Neighbourhood Plan to comply with the JLP; • The OAN is required to be a proper assessment of need but as proposed it appears to address an aspirational level of growth, which needs to be justified and explained; • The level of growth proposed in the OAN means that to achieve a 5year supply of deliverable housing land will require sites to allocated, impossible to deliver, are unsustainable and will cause immense harm to the rural communities; • “Is there scope to review the OAN's projected population growth and level of migration against changed circumstance i.e. Brexit, HS2 and so on? And further, how can the JLP avoid over-allocation of housing to the rural parishes”? • Demonstrate how the Parish's existing OANs will be incorporated in the Joint Local Plan as a “fair share of local housing need”; 	The SHMA document sets out a robust methodology for working out the OAN for the Local Plan area. The Councils have set out a strategy to now be able to meet this as the NPPF requires us to meet this in full. The Government is currently running consultation on a standardised methodology for working out the OAN, the Council will need to take account of this as it is formalised.

Reference	Consultee	Consultee Comments	Officer Comments
		<ul style="list-style-type: none"> What is the Staffordshire County Council's position on the provision of services and infrastructure to accommodate the level of growth projected in the OAN; 	
SO17/345/1756	CPRE Staffordshire	<p>Our main concern would be to question the evidence available to support what is said in Issue 5 - Green Belt. Our Recommendations</p> <p>To demonstrate its commitment to protecting the Green Belt, CPRE believes that the Councils should :</p> <ul style="list-style-type: none"> not relax Green Belt policy and make it clearer that unnecessary or major losses of Green Belt should be avoided acknowledge that high levels of housing demand or housing targets do not in themselves amount to the "exceptional circumstances" required to justify changing Green Belt boundaries reduce pressure on the Green Belt by prioritising the use of brownfield sites 	A Green Belt Assessment is being undertaken by the Councils. Where there are exceptional circumstances for release the Council will consider these.
SO17/343/1757	D2H	Concerns over the timetable and evidence base. Also uncertainty over how HS2 will be incorporated into the Local Plan.	The Council will interpret and publish new evidence as it emerges to meet the timetable with a sound plan.
SO17/326/1758	Daryl Smith	Concerns over the identification of Loggerheads as a Rural Service Centre, and further development there.	The Local Plan will look to meet the housing needs across the plan area and appropriate development will be delivered.
SO17/335/1759	Dean Lewis Estates	There should be higher growth, in balance with the NGDZ and HS2. This should take into account potential releases of Green Belt land, especially to the north.	The comments in support of higher growth are noted. Where exceptional circumstances are accepted, release of Green Belt will be considered.
SO17/325/1761	Elizabeth Dokic	Need for new well-designed and fitted bungalows for the elderly and less-abled/disabled. Also a choice of Retirement complexes with on site facilities /surgery with dispensary pharmacy etc.	Comments noted and welcomed. These comments will be taken into account when drafting the Joint Local Plan policies as they are more closely related to developing policies which relate to the design/type of housing at the Draft Plan stage.
SO17/344/1763	The Environment Agency	There is a need for a Water Cycle Study (WCS) and a	Both Councils are keen to ensure there is on going

Reference	Consultee	Consultee Comments	Officer Comments
		Strategic Flood Risk Assessment (SFRA) to be undertaken. Without these, it is difficult to comment fully. Issues of Climate change and renewable energy need to be considered further.	discussions with the Environment Agency throughout the preparation of the plan, under the Duty to Cooperate. The suggested amendments to the wording of the aims will be taken into account when drafting future documents.
SO17/334/1772	Historic England	Ensure that Heritage is adequately addressed within the Local Plan. Harm from development such as transport infrastructure, Gypsy & Traveller Accommodation, on the historic environment, needs considering. Heritage Strategies need to be referenced within the Local Plan.	One of the key aims of the Joint Local Plan is making our historic past work for our future and as part of this it aims to enhance our built heritage. Therefore the Councils will ensure that work is continued to ensure this protection is set out in an appropriate manner.
SO17/346/1774	Intu Properties plc	The strategy for retail and leisure, the City Centre and mixed uses are generally well supported. However it is considered that the evidence needs updating.	The comments in support of the retail strategy are noted.
SO17/338/1779	Keele University	The representations summarises the Keele Deal and the University priorities.	The importance of the University in the local area is recognised and the Councils are keen to support this in an appropriate manner.
SO17/333/1781	Mr Jones	The representation questions the need to release Green Belt as well as the need to do a Green Belt Review rather than a Green Belt Assessment.	The Green Belt Assessment will assess the green belt against the 5 purposes set out within the NPPF. This will help inform where green belt release could take place if exceptional circumstances are considered.
SO17/323/1785	Cycling UK, North Staffordshire	Cycling and Walking should be promoted within the Local Plan.	The comments with regards to cycling are noted. One of the aims of the plan is to support healthy and active communities and therefore this will be incorporated into the plan.
SO17/330/1789	Chapel and Hill Chorlton, Maer and Aston and Whitmore Neighbourhood Development Plan	The need to ensure that where they exist, neighbourhood planning areas are fully involved in the process.	Comments are noted.
SO17/328/1791	North Planning Loggerheads	Concerns over the impact of growth on the rural area. Also the need to ensure that where they exist, neighbourhood planning areas are fully involved in the process.	The Councils appreciate and hope to incorporate the work of Neighbourhood Planning groups. It must however be noted that the NPPF states that the Local Plan should meet all need and significantly boost housing delivery.

Reference	Consultee	Consultee Comments	Officer Comments
SO17/322/1794	The Coal Authority	Coal Authority comments from the issues stage are still relevant and have no further comments at this stage.	Comments are noted.
SO17/331/1798	Stoke-on-Trent City Council (Housing)	We consider the vision outlined in the Strategic Options document to be appropriate for Stoke on Trent and the Plan area. The aspirations to be a great place to live and work aligns with the recent Stoke on Trent Housing Strategy which sets out an ambition to enhance Stoke-on-Trent's housing offer so that people at all stages of life can find and live in a quality home they want at a price they can afford.	Comments are noted and appreciated.
SO17/336/1801	Staffordshire County Council	The County wish to ensure that issues around education, transport, landscape, Archaeology and Historic Landscape Character, rights of way, minerals and waste, climate change, flood risk and public health need to be considered when working on the plan.	The Council will continue to work with the County Council through the Duty to Cooperate to ensure that the Local Plan and its accompanying IDP is appropriate for the area.
SO17/324/1803	The Planning Inspectorate	<p>Thank you for sending us notification of your Regulation 18 consultation on which representations have been invited. I understand this has been published for consultation in accordance Regulation 18(1)(b) of the 2012 Regulations.</p> <p>On publication of the Local Plan under Regulation 19 please send the Planning Inspectorate notification of the Local Plan consultation. Upon receipt the Planning Inspectorate will enter into a Service Level Agreement (SLA).</p> <p>When submitting the regulation 19 to the Planning Inspectorate, please ensure that you confirm the specific date on which you intend to submit your Local Plan for examination. This date is needed to reserve an Inspector at the appropriate time to examine your Local Plan when you submit under regulation 22. You</p>	The comments from the inspectorate are noted and guidance will be followed.

Reference	Consultee	Consultee Comments	Officer Comments
		<p>should also ensure that a Programme Officer is in place upon submission, although we strongly recommend that they are in post by regulation 19 publication stage.</p> <p>To assist in preparing for the examination, you may find it helpful to refer to the Planning Inspectorate publication Examining Development Plan Documents: Procedure Guidance. This can be found on our website: http://www.planningportal.gov.uk/planning/planningsystem/localplans</p> <p>Please note this guidance is currently in the process of being updated to reflect the changes in the Localism Act 2011; the National Planning Policy Framework and the 2012 Regulations.</p>	
SO17/332/1804	Severn Trent Water	The representation questions the appropriateness of the lower options, if unable to meet the OAN. They also promote sites within Severn Trent Ownership for development.	The positives and negatives of the range of housing requirement are to be considered in setting it at the appropriate level. All sites that have been submitted to the Council through Call for Sites and those within the SHLAA have under gone consideration for allocation.
SO17/327/1806	Network Rail	There is a need to ensure that development does not produce a detrimental impact upon the railways.	The comments from Network Rail are noted and guidance will be followed where necessary.
SO17/337/1807	United Utilities Water	Concerns over waste water treatment and policies with regards to dealing with this. Suggested policy wording has also been included.	The Councils will continue to work with infrastructure providers through the duty to cooperate and the IDP to ensure the plan can be delivered. The site selection including the SHLAA will consider surrounding uses.
SO17/342/1808	Urban Vision North Staffordshire	Concerns over the timetable and evidence base. Also uncertainty over how HS2 will be incorporated into the Local Plan.	The Council will interpret and publish new evidence as it emerges to meet the timetable with a sound plan.
SO17/358/1811	Mineral Products Association	Ensure that a minerals safeguarding area is identified and shown on the policy map. Ensure that this is taken into account when allocating sites.	The Councils will continue to develop a strategy for minerals, in conjunction with the County.

Reference	Consultee	Consultee Comments	Officer Comments
SO17/362/1812	Graham and Sylvia Rowe	As many as possible brownfield sites should be used first in future developments.	The Joint Local Plan will look to allocate a range of sites that both regenerates the area as well as delivering the housing need across the area in accordance with the strategy.
SO17/361/1813	Mr and Mrs D Spode	Opposition to any development of land in Barthomley Road, Audley between the Black and White House and Aldore.	The Joint Local Plan will look to allocate a range of sites that both regenerates the area as well as delivering the housing need across the area in accordance with the strategy. Each site will be considered accordingly on its own merits.
SO17/363/1817	Pat Lee	Despite the high costs involved, there should be no development on green belt or open countryside until all the brownfield sites have been developed. Focus should be on addressing derelict land and building and rejuvenating those areas.	The Joint Local Plan will look to allocate a range of sites that both regenerates the area as well as delivering the housing need across the area in accordance with the strategy.
SO17/364/1818	Mrs J.K. Reynolds	Objection to Land at Barthomley Road being included for development.	The Joint Local Plan will look to allocate a range of sites that both regenerates the area as well as delivering the housing need across the area in accordance with the strategy. Each site will be considered accordingly on its own merits.
SO17/359/1822	Thistleberry Residents Association	The representation includes a wide range of issues. These include ensuring that evidence is published on time. That improvements are needed to City, Town and Other Centres. Health issues need to be addressed in the plan as does the quality of environment. There needs to be recognition of local heritage. There are environmental issues that need remedying through the plan such as the deterioration of SSSIs in the area.	The comments are noted. The Local Plan has to be based on robust evidence to be considered sound; as new evidence is produced it will continue to be published to the website.
SO17/694/1824	Neale Sheldon	Places such as Keele village, Loggerheads, Baldwins Gate, Whitmore should be protected totally in the City plan, i.e no more houses on this greenbelt land.	The Joint Local Plan will look to allocate a range of sites that both regenerates the area as well as delivering the housing need across the area in accordance with the strategy. Each site will be considered accordingly on its own merits.
SO17/695/1825	Stephanie Evans	Promotion of a site at Clayton for residential	The Joint Local Plan will look to allocate a range of

Reference	Consultee	Consultee Comments	Officer Comments
		development.	sites that both regenerates the area as well as delivering the housing need across the area in accordance with the strategy. Each site will be considered accordingly on its own merits.
SO17/697/1827	Theatres Trust	Promotion for the inclusion of a culture policy within the plan.	The aims of the plan include ensuring the recognition of the area as a destination, the development of culture is a key part of this.
SO17/700/1830	The Connecting Tracks Project	I am the author of an Action Area Plan I developed alongside local people in Middleport in 1976. A copy is held in the Archive collection at Hanley library. "Middleport Community Plan, a plan by local people".	Comments are noted.
SO17/702/1832	Richard Nicholl	Concerns of the sustainability of any further development at Loggerheads.	The Joint Local Plan will look to allocate a range of sites that both regenerates the area as well as delivering the housing need across the area in accordance with the strategy. Each site will be considered accordingly on its own merits.
SO17/703/1833	Donald Butterworth	The Consultation Document maybe well written but lacks substance as to how objectives will be achieved; there is a lack of quantified robust evidence to support the various Options. The Document may make for good reading but sadly, in my case leaves the reader just wondering what the story line is all about.	As the Local Plan continues to emerge, it will contain further information around the delivery of development. This may include types, phasing and infrastructure. The strategic options is about agreeing the broad parameters of the plan before the detailed work.
SO17/704/1834	Paul Baddeley	More emphasis required on the location of train stations. Bus services meet demand but operators need assistance and future notice of plans to provide services to meet demand before people use cars and don't need buses. Carefully planning of developments don't only to protect walking and service routes and protect shorter routes, new routes need to be planned when developments come forward.	The Joint Local Plan will be supported by an Infrastructure Delivery Plan (IDP) which will ensure that development is supported by the delivery of appropriate infrastructure in a timely manner.
SO17/705/1835	Loggerheads Parish Council	Concerns over the sustainability of the growth numbers and how this will be supported by	The Joint Local Plan is supported by the SHMA which provides detailed, robust evidence of how the housing

Reference	Consultee	Consultee Comments	Officer Comments
		infrastructure.	<p>requirement has been formulated. As the Governments standardised methodology on housing need is formalised this will also be taken into account.</p> <p>With regards to infrastructure, the Joint Local Plan will be supported by an Infrastructure Delivery Plan (IDP) which will ensure that development is supported by the delivery of appropriate infrastructure in a timely manner.</p>
SO17/706/1836	Adri Hartveld	Please do not pass my email address to any other organization or company.	Noted. Comments are not anonymous; however we do keep e-mail addresses private.
SO17/708/1838	Catherine Salt	The two areas should link together more. There needs to be more promotion of the area nationally.	The comments are noted; however this appears to be out of the remit of the Local Plan.
SO17/709/1839	Mr and Mrs Phillips	We are greatly concerned by options 5 and 6 which we think have been added since the original discussions. The area includes land which is in active use as agricultural land, eg the field off Barthomley road and the land behind the houses on Nantwich Road.	The Joint Local Plan will look to allocate a range of sites that both regenerates the area as well as delivering the housing need. Each site will be assessed on its own merits.
SO17/710/1840	Carlton Woolley	Brownfield development should come first and Green Belt should be avoided.	The Joint Local Plan will look to allocate a range of sites that both regenerates the area as well as delivering the housing need across the area.
SO17/712/1842	Jacqueline Karen Reynolds	Concerns over the development of Land at Barthomley Road.	The Joint Local Plan will look to allocate a range of sites that both regenerates the area as well as delivering the housing need. Each site will be assessed on its own merits.
SO17/713/1843	Lynne Woolley	Concerns over the provision of infrastructure in the rural area.	The Joint Local Plan will look to allocate a range of sites that both regenerates the area as well as delivering the housing need across the area in accordance with the strategy. Each site will be considered accordingly on its own merits. The Councils will continue to work with infrastructure providers through the duty to cooperate and the IDP to ensure the plan can be delivered and supported by

Reference	Consultee	Consultee Comments	Officer Comments
			the appropriate infrastructure.
SO17/714/1844	John Lamont	<p>No consideration seems to have been given to the negative environmental effect the development of HS2 will have on the Rural areas of Madeley and Whitmore for the foreseeable future.</p> <p>Despite considerable housing development the population in Madeley did not change in the ten years between the last censuses. Younger people have moved away, so many houses are occupied by only one or two older people. There are always 30-40 houses for sale in the parish. The rural areas do not need more housing.</p>	<p>The Joint Local Plan will look to allocate a range of sites that both regenerates the area as well as delivering the housing need across the area in accordance with the strategy. Each site will be considered accordingly on its own merits.</p> <p>At this stage, any potential growth in the wider economy arising from HS2 is not being taken into account in the Joint Local Plan, because any economic growth is not sufficiently evidenced yet. It is however recognised that HS2 will have implications on the plan area at some point, but any resulting effects might occur towards the end of the plan-period. At the moment the route is confirmed and a narrow safeguarding strip either side of the proposed route has been identified. The Local Planning Authority is required to notify HS2 of any planning applications in that area.</p>
SO17/715/1845	Janet Lamont	Opposition to the development of the Green Belt and rural area.	The Joint Local Plan will look to allocate a range of sites that both regenerates the area as well as delivering the housing need across the area in accordance with the strategy. Each site will be considered accordingly on its own merits.
SO17/717/1847	M Davies	Concerns over development of land near Nantwich Road near Audley.	The Joint Local Plan will look to allocate a range of sites that both regenerates the area as well as delivering the housing need across the area in accordance with the strategy. Each site will be considered accordingly on its own merits. The Councils will continue to work with infrastructure providers through the duty to cooperate and the IDP to ensure the plan can be delivered.
SO17/719/1849	Keele Parish Council and Neighbourhood Plan	In conclusion we urge caution with regard to the OAN or any other projection of likely future housing need. A sensible and balanced assessment of probable	It is considered that the SHMA and OAN is a reliable and robust part of the evidence base upon which the housing requirement can be based. It is

Reference	Consultee	Consultee Comments	Officer Comments
		economic growth and the impact this will have on local need is desirable.	acknowledged that the Government is currently consulting on a standardised methodology and as this is confirmed, it will be taken into account. The NPPF states that this need should be met across the Housing Market Area.
SO17/727/1857	Jennifer Cook	I am not happy that the site of the old working men's club on new road in Bignall End near Audley has been designated as mixed use. The site already has planning permission for 12 homes which should go ahead because there is already great demand for houses in the area. There is already a thriving retail centre in Audley which is just over 0.5miles from the proposed retail site and I feel it would be detrimentally impacted if a shop was built so close to it. Please designate the site as housing only to keep the village feel of the area.	The Joint Local Plan will look to allocate a range of sites that both regenerates the area as well as delivering the housing need across the area in accordance with the strategy. Each site will be considered accordingly on its own merits.
SO17/730/1860	Alderman David Becket	<p>This process started in 2011. We do not have a housing allocation plan and developers are having a field day. This has been a stop start process, and a number of end dates have been offered. The current is 2020 and this has been moved back from 2018. Unless there is a more enthusiastic and logical approach from the council this could drag on beyond 2020.</p> <p>This is a very bad response form. I prefer to complete the form, save it, think it over, review it then send. The only option you give is submit. It has taken 4 attempts to complete this form, the most user unfriendly on line response form I have encountered.</p>	The comments are noted. The Councils have to ensure that the plan is robust and fully evidenced and unfortunately this can take time, however the Councils have set out an appropriate timetable for production. The Council will continue to ensure that the methods of consultation are appropriate and useable for further rounds of consultation.
SO17/736/1866	Madeley Parish Council and Neighbourhood Plan Steering Group	Further information in the form of a letter from Madeley Parish Council, the Neighbourhood Plan steering group and Madeley Conservation Group is attached.	Noted
SO17/738/1868	FUCHS Lubricants (UK) plc	We believe it is essential that any forthcoming	The comments are noted, the Local Plan will continue

Reference	Consultee	Consultee Comments	Officer Comments
		planning policies recognise the contribution of businesses such as Fuchs Lubricants (UK) Ltd to the local and national economy and support them accordingly.	to support businesses where appropriate.
SO17/739/1869	Gwyn Griffiths	Very poor evidence base in documentation.	The Councils will continue to update and publish its evidence base on the website as the Local Plan emerges.
SO17/740/1870	Stafford Borough Council	The Stafford Borough is generally supportive of the vision, strategic aims and objectives within the Strategic Options document. However it is important to ensure that a balanced approach takes place between the growth requirements of Stafford Borough and the focus for new investment, retail provision and housing growth within the Joint Local Plan area. Clearly it is important that the local population needs within Stoke-on-Trent and Newcastle-under-Lyme Borough are accommodated to reduce out-migration and pressure on the strategic transport network but not at the expense of economic growth in the surrounding areas including Stafford Borough.	The Councils will continue to work with neighbouring authorities throughout the plan preparation under the Duty to Cooperate requirements. The housing requirements will be based upon robust evidence to ensure they are appropriate for the local area.
SO17/693/1872	Cynthia England	Had I more time, I would have further comments, but only recently become aware of this opportunity to contribute, & am doing this at 4.30pm on 22nd. I understand there will be further opportunities to comment/contribute.	Throughout the preparation of the plan there will further opportunities to comment as the plan emerges.



**Newcastle-under-Lyme Borough Council
Stoke-on-Trent City Council**

Joint Local Plan

Preferred Options Consultation

Sustainability Appraisal Report

December 2017

Joint Local Plan

Preferred Options Consultation

Sustainability Appraisal Report

For further information on this document or to obtain it in other formats, please contact one of the Councils at:

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NON-TECHNICAL SUMMARY

Introduction

This is the Non-Technical Summary of the Sustainability Appraisal (SA) report for the Newcastle-under-Lyme Borough Council and Stoke-on-Trent Joint Local Plan Preferred Options Consultation document.

All Councils are required to undertake SA as a key part of preparing a Local Plan. Its purpose is to promote sustainable development by assessing if the Local Plan will help to achieve relevant environmental, economic and social objectives. It forms part of an ongoing process to develop, refine and choose between alternative planning approaches at each stage of preparing the Joint Local Plan.

The preparation of the SA for the Joint Local Plan has so far involved:

- The production of a draft Scoping Report setting out the scope of the Sustainability Appraisal, a copy of which can be found on either council's website.
- The production of an SA Report to accompany the Joint Local Plan Strategic Options Consultation document, which was published in July 2017.
- The production of this SA Report to accompany the Joint Local Plan Preferred Options Consultation document.

Joint Local Plan Preferred Options

The Joint Local Plan Preferred Options Consultation document has been prepared in accordance with the Planning and Compulsory Purchase Act 2004 (as amended). This sets out both councils preferred overall approaches for managing and enabling development across the plan area in the period up to 2033.

The Preferred Options Consultation document sets out at a strategic level the approaches that both councils intend to pursue in regard to delivering and managing future housing, employment, retail and main town and city centre uses. This includes identifying at this early stage the major mixed use development schemes which will help to deliver the Joint Local Plan's vision, aims, objectives and preferred growth strategy. It also establishes the councils preferred approach in regard to Green Belt, Green and Open Spaces and Mineral safeguarding.

These preferred options have each been subject to appraisal for their sustainability. The results and recommendations of these appraisals form the basis for this SA Report. This should be read in conjunction with the main Joint Local Plan Preferred Options Consultation document.

Sustainability Appraisal

The sustainability appraisal process incorporates Strategic Environmental Assessment (SEA). SEA seeks to identify where plan proposals are likely to have a significant future effect on the environment, the SA process incorporates this and also identifies potential social and economic effects. Measures to improve the

sustainability of the plan's proposals are to be recommended through the appraisal process along with ways of measuring how the plan performs in regard to sustainability once the plan has been adopted. The overall aim of this process is to ensure that the final adopted Joint Local Plan will contribute to the achievement of sustainable development.

SA is a valuable process in supporting the preparation of the Joint Local Plan as it helps to identify at each stage of plan production what the most appropriate approach might be in terms of delivering sustainable development. To do this, the SA aims to identify any potential social, economic or environmental effects that may arise as a result of the planning approaches to be pursued and make recommendations for how these effects can be avoided or improved where necessary.

The SA will be reviewed at each stage of plan production and this will take account of any consultation responses received during this stage on this report.

Amended Joint Local Plan Objectives

The Joint Local Plan Strategic Options Consultation document proposed twenty seven plan objectives which were subject to SA at that stage. Following the public consultation period, seven of the plan objectives were reviewed and amended. As a result of their amendment, the previous appraisals for these seven plan objectives have been reviewed. This has found that there is no overall change to the SA findings for these plan objectives but there may now be a neutral, rather than positive effect of the amended plan objective to encourage the development of brownfield land.

Sustainability Appraisal of the Preferred Options

Most of this report sets out the findings and recommendations resulting from the SA of the 19 preferred options set out within the main consultation document. These preferred options set out at a broad level the overall approaches that both councils propose to pursue in regard to the amount and location of development through the Joint Local Plan. These cover the preferred options for delivering housing, employment, retail and town and city centre developments as well as major schemes that can help to deliver this growth and proposed approaches in regard to the Green Belt, Green and Open Space and Minerals. Further information about these preferred options is set out within the Preferred Options Consultation document and the result of the sustainability appraisal process for each of these is set out later on in this report.

Next Steps

The Preferred Options Consultation document sets out both councils preferred approaches to be pursued by the Joint Local Plan. These have been selected having taken in to account the SA and public consultation responses of the previous Strategic Options stage, along with any new evidence or national policy and guidance that has become available since the Strategic Options consultation stage.

The Joint Local Plan production and SA processes are interlinked and iterative. This means that the development of the Joint Local Plan takes in to account the findings of the SA undertaken at each plan production stage and this then leads to the refinement of planning policies and proposals which are then again subject to SA.

The Draft Joint Local Plan is the next stage of plan production and this will set out the more detailed planning policies, site allocations and designations of land proposed to be taken forward in the Final Local Plan. The development of this detailed document will have been informed by the findings and recommendations of this SA report, as well as that of the Strategic Options consultation stage. The Draft Local Plan will also be subject to SA and the findings at that stage will inform the preparation of the Final Local Plan.

The Final Joint Local Plan will be submitted to the government so that an independent examination can be held by a Planning Inspector who will determine whether the plan has been prepared in accordance with the requirements of national planning policy and relevant legislation. This will include a judgement as to whether the plan has been subject to an appropriate SA process and to enable this a final SA Report will need to be submitted together with the Final Joint Local Plan.

Joint Local Plan Preferred Options Consultation – Sustainability Appraisal Report

1. Introduction

- 1.1 This report accompanies the Joint Local Plan Preferred Options Consultation document and should be read in conjunction with the content of that report.
- 1.2 Section 19 of the Planning and Compulsory Purchase Act (2004)¹ requires local planning authorities to;
 - a) carry out an appraisal of the sustainability of the proposals in each (development plan) document, and;
 - b) prepare a report of the findings of the appraisal.
- 1.3 This report sets out the findings of the appraisal of the sustainability of the Joint Local Plan Preferred Options, which are now being subject to public consultation.
- 1.4 Sustainability Appraisal is a process whereby the potential social, environmental and economic effects of a plan or project are identified and assessed. Mitigation or compensatory measures which may be required to overcome any negative effects are also identified as part of the appraisal process.
- 1.5 This sustainability appraisal process incorporates the requirements of the Strategic Environmental Assessment (SEA) Directive² to assess the environmental effects of new plans or programmes. The sustainability appraisal broadens this out to also assess the social and economic effects of plans and programmes.
- 1.6 Sustainability appraisal is an essential tool in ensuring that Local Plans meet the National Planning Policy Framework requirement that they are “prepared with the objective of contributing to the achievement of sustainable development”³

¹ <http://www.legislation.gov.uk/ukpga/2004/5/section/19>

² Directive 2001/42/EC of the European Parliament and of the Council of 27 June 2001 on the assessment of the effects of certain plans and programmes on the environment

³ National Planning Policy Framework (2012) Department for Communities and Local Government paragraph 151

2. Methodology

- 2.1 Planning Practice Guidance sets out five stages in the sustainability appraisal process;

Stage A	Setting the context and objectives, establishing the baseline and deciding on the scope.
Stage B	Developing and refining alternatives and assessing effects
Stage C	Prepare the Sustainability Appraisal Report
Stage D	Seek representations on the Sustainability Appraisal Report from consultation bodies and the public
Stage E	Post adoption report and monitoring

- 2.2 The Borough Council and the City Council prepared a joint Sustainability Appraisal Scoping Report which addresses the requirements of Stage A. This was subject to consultation with the consultation bodies prescribed by Regulation 4 of the Environmental Assessment of Plans and Programmes 2004 (the Environment Agency, Heritage England and Natural England) plus Staffordshire County Council and adjoining local authorities. The final version of the Scoping Report is available to download from either council's website and should be read in conjunction with this Preferred Options Sustainability Appraisal Report.
- 2.3 Previous stages of plan production so far have seen public consultation on the identification of the Issues for the Joint Local Plan to address and the exploration of Strategic Options for addressing the issues. The Issues Consultation Document was published for a public consultation period between 15th February 2016 and 29th March 2016. This was not subject to sustainability appraisal as it was a document that focused on what the Joint Local Plan should address and not the policy response to address the issues that were identified.
- 2.4 The Strategic Options Consultation document was published for public consultation between July and August 2017. This was accompanied by a Sustainability Appraisal Report which tested the proposed Aims and Objectives for the Joint Local Plan and the different Growth Scenarios and Broad Location Options that could be pursued to address the housing and employment development needs identified through evidence gathering and the Issues consultation responses. This was undertaken under Stages B, C and D of the above table.
- 2.5 The findings of the Sustainability Appraisal Report for the Strategic Options Consultation Document and the public comments received during the Issues and Strategic Options public consultation periods have informed the preparation of the Preferred Options Consultation document. It is these

Preferred Options which are now the subject of this Sustainability Appraisal Report.

- 2.6 Sustainability appraisal is an iterative process, and so Stages B, C and D will be repeated at each stage of plan production until the final version of the Joint Local Plan and associated documents are submitted to the Secretary of State for Examination.
- 2.7 Stage E of the process will follow when the Joint Local Plan has been adopted by both councils.
- 2.8 The Planning Practice Guidance provides further detail on what should be covered under Stage B. This includes the following;
 1. Test the Local Plan objectives against the sustainability appraisal framework
 2. Develop the Local Plan options including reasonable alternatives
 3. Evaluate the likely effects of the Local Plan and alternatives
 4. Consider ways of mitigating adverse effects and maximising beneficial effects
 5. Propose measures to monitor the significant effects of implementing the Local Plan
- 2.9 It should be noted that this SA Report is part of the options stage of plan production, which comprises of both the Strategic Options that were previously subject to public consultation and this current Preferred Options stage. The SA Reports for these two stages should therefore be considered alongside each other as the Strategic Options SA Report evaluated the reasonable alternatives, whilst this Preferred Options SA Report evaluates the chosen approaches.
- 2.10 The Strategic Options Consultation document proposed a set of plan objectives that were subject to sustainability appraisal at that plan production stage. Following the Strategic Options public consultation some of these plan objectives have been subject to minor amendment and have been reassessed for their potential sustainability. The outcome of the updated sustainability appraisals for these revised plan objectives is set out in Section 4 of this report.
- 2.11 The remainder of this Sustainability Appraisal Report sets out the appraisal for each of the preferred options that are being made subject to public consultation. The following sections provide more detail about how these preferred options have been tested and evaluated.

SA Team Approach

- 2.12 As established within the Sustainability Appraisal Scoping Report, the councils use an 'SA Team' approach to undertake sustainability appraisals at the various stages in the plan production process. This involves gathering together a range of internal officers from different departments in both authorities and

also Staffordshire County Council to discuss and undertake each individual sustainability appraisal.

2.13 The specialist officers within this group include, but are not limited to the following general work areas:

- Health
- Regeneration
- Economic development
- Housing
- Ecology
- Open space/ landscape
- Leisure
- Heritage
- Transport
- Environmental health
- Planning

2.14 It is not considered necessary for each stage to include someone representing each specialism but each meeting of the SA Team should comprise of several different specialisms from each authority.

3. Sustainability Appraisal Objectives

- 3.1 The Sustainability Appraisal Scoping Report reviewed the objectives that were used for testing the sustainability of the Core Spatial Strategy. These were updated to take account of new baseline evidence about the social, economic and environmental conditions of the plan area and to reflect relevant objectives arising from more recent international, national, sub-regional and local plans and programmes.
- 3.2 A new set of sustainability objectives were then identified which were discussed and agreed by specialist internal officers at an SA Team workshop. These were then subject to consultation with the Environment Agency, Heritage England, Natural England, Staffordshire County Council and adjoining local authorities as part of the consultation the draft Sustainability Appraisal Scoping Report in August and September 2015. The final sustainability objective were then finalised as set out in the table below.

Sustainability Appraisal Objectives	
1.	To contribute to carbon reduction and adapt to a changing climate, including increasing the use of renewable energy and energy efficiency in existing, new development and redevelopment
2.	To improve air quality, creating cleaner and healthier air
3.	To ensure that there is an overall net gain in the extent and quality of biodiversity
4.	To reduce contamination, regenerate degraded environments, re-use materials, and maintain soil, geological and land resources
5.	To reduce the amount of development within locations at risk of flooding and promote the use of sustainable drainage systems
6.	To increase the efficient use of water resources, improve water quality and meet the requirements of the Water Framework Directive
7.	To conserve, enhance and promote interest in local distinctiveness, the historic environment, heritage, cultural assets and their settings.
8.	To strengthen the quality of the landscape and city townscape including historic landscape character in urban and rural areas, and deliver well designed development which respects local character and distinctiveness
9.	To ensure the efficient use of mineral resources, including the recycling and reuse of existing materials where possible in order to limit the use of primary aggregates and to safeguard their supply
10.	Maintain and enhance quality and accessibility of green space
11.	Encourage schemes that contribute to self-sufficiency in waste treatment and encourage local communities to take responsibility for the waste that they generate
12.	To provide housing choice and help meet the housing needs of the whole community
13.	To increase life expectancy and improve the health and mental well-being of the population overall
14.	To provide a more equitable society where the provision of the widest possible range of community, cultural, educational, health, recreational and leisure

Sustainability Appraisal Objectives	
	facilities, and access to public transport are available to all sectors of the population with particular emphasis on deprived neighbourhoods
15.	Reduce crime and the fear of crime
16.	To reduce the need to travel while increasing transport choice and accessibility for all
17.	To enable access to the widest range possible of shopping and commercial services for the resident population
18.	To provide a range of employment land and premises that meets the needs of the business community and tackles socio- economic inequalities within the population
19.	To protect and enhance the vitality and viability of the city, town and district centres within the urban areas and village centres in the rural area
20.	To provide a safe, efficient transport network and increase the use of public transport, cycling and walking

- 3.3 These objectives have been used through the SA Team process to test the proposed plan objectives, growth scenarios and broad location options that are set out in Preferred Options Consultation document. The outcomes of the appraisals are set out in the next sections of this report.

4. The Sustainability Appraisal of the Revised Joint Local Plan Objectives

- 4.1 The Strategic Options Consultation document set out a proposed vision, six aims and twenty seven objectives to guide the direction of the Joint Local Plan period up to 2033. Following the public consultation period for the Strategic Options, amendments were made to seven of the plan objectives.
- 4.2 The previous sustainability appraisals for these plan objectives were reviewed by the SA Team who identified any appropriate changes to the potential effects of each objective. A summary of the updated sustainability appraisals and the changes identified by the SA Team are set out below.

Aim:	Amended Joint Local Plan Objective (amendments shown in red text):	Summary of the Updated Sustainability Appraisal:
UK Central Hub for Innovation and Investment	To support and boost existing and new opportunities for business growth, encouraging new investment; entrepreneurship and digital connectivity.	No change was suggested from the previous sustainability appraisal undertaken at the Strategic Options stage.
Dynamic and Diverse Neighbourhoods	Increasing the number of homes delivered across the Housing Market Area, through a range of sites capable of delivering the type and mix of housing required	No change was suggested from the previous sustainability appraisal undertaken at the Strategic Options stage.
Utilising our Natural Assets and Resources	To protect, and improve and enhance the countryside and the diversity of wildlife and habitats across the plan area.	No change was suggested from the previous sustainability appraisal undertaken at the Strategic Options stage.
Utilising our Natural Assets and Resources	To prioritise encourage the development of sustainable Brownfield land taking into consideration account constraints , the need for sustainable development and the potential environmental and ecological impacts.	The potential effect identified against the sustainability appraisal objective to reduce contamination, regenerate degraded environments, re-use materials and maintain soil, geological and land resources was changed from minor positive to neutral. This was due to the increased flexibility that this revised plan objective has on the development of brownfield land.
Strong City Centre and Market Town with a Diverse Network of Towns and Villages	To grow and strengthen the strategic roles of Stoke-on-Trent City Centre and Newcastle Town Centre in the region to attract more visitors to the area and to support new employment opportunities and job growth.	No change was suggested from the previous sustainability appraisal undertaken at the Strategic Options stage.
Making our Historic Past Work for the Future	To increase the attraction of the area as a tourist destination, to facilitate the development of leisure, arts and cultural attractions and to increase the number of	No change was suggested from the previous sustainability appraisal undertaken at the Strategic Options stage.

Aim:	Amended Joint Local Plan Objective (amendments shown in red text):	Summary of the Updated Sustainability Appraisal:
	day and overnight visitors.	
Making our Historic Past Work for the Future	To protect and enhance the historic heritage assets and the unique character of both rural and urban areas by ensuring new developments are appropriate in terms of scale, location and their context.	No change was suggested from the previous sustainability appraisal undertaken at the Strategic Options stage.

4.3 The amendments to these plan objectives and the summaries of the updated sustainability appraisals should be read in the context of the Strategic Options Sustainability Appraisal Report, as this sets out how the plan objectives were originally assessed.

5. The Sustainability Appraisal of the Joint Local Plan Preferred Options

- 5.1 The main purpose of the Preferred Options Consultation document is to set out both councils preferred overall approach to delivering the amount and type of development, uses of land and initial principles for how development is proposed to be managed in Newcastle-under-Lyme and Stoke-on-Trent over the plan period 2013 to 2033.
- 5.2 The Preferred Options that are now subject to public consultation within the main consultation document are set out in the table below, together with a brief description of what the preferred option entails.

Preferred Option:	Brief Description:
Preferred Growth Option	The amount of new housing and employment land to be delivered over the plan period
Preferred Spatial Option	Splitting up of the plan area in to five broad spatial areas to support the delivery of development across distinct areas (see also Character Areas below)
Employment Land Supply	The sources of employment land supply to meet the Preferred Growth Option
Quality of Employment Land	Breakdown of the Preferred Employment Land Supply to provide for different types of employment development
Rural Employment	The preferred approach for accommodating employment development within Newcastle-under-Lyme's rural area
Spatial Distribution of Housing	The sources of housing land supply to meet the Preferred Growth Option
Key Strategic Developments	Major development schemes that will play a key role in meeting the Preferred Growth Option; <ul style="list-style-type: none"> ▪ Stoke-on-Trent City Centre ▪ Stoke-on-Trent Railway Station ▪ Newcastle Western Urban Extensions (including Keele University) ▪ Berryhill
Green Belt	Proposed amendments to Green Belt boundaries
Hierarchy of Centres	A new hierarchy of centres across the plan area to replace that set out in the Core Spatial Strategy
Centre	An overview of amendments proposed to existing city and town

Preferred Option:	Brief Description:
Boundaries	centre boundaries
Key Strategic Sites for Retail and Leisure Provision within Centres	Major retail and leisure development schemes in centres that will help to support the preferred levels of growth
Out of Town Shopping	Recognising the existing out of centre shopping locations that are already established in the plan area but restricting their further expansion
Retail Impact Threshold	Proposed new thresholds for major out of centre retail schemes where an assessment of the impact on the vitality and viability of the city and town centres will be required
Green and Open Space	The preferred approach for managing the future provision of green and open spaces across the plan area
Minerals	Proposed safeguarding of important mineral resources in Stoke-on-Trent
Character Areas	A proposed more detailed sub-division of the plan area beyond those of the spatial areas referred to above, enabling a more detailed analysis of local character and communities and the delivery of growth appropriate to those areas

- 5.3 For more detailed information about each of these preferred options, please read the main Preferred Options Consultation Document.
- 5.4 Each of the preferred options set out in the table above have been subject to sustainability appraisal by the SA Team. The outcomes of these appraisals are set out in the tables on the following pages.

Summary of the Potential Effects of the Preferred Options

SA Objective (summary of main focus – see pages 11-12 for full SA objective):		Preferred Growth Option	Preferred Spatial Option	Employment Land Supply	Quality of Employment Land	Rural Employment
1.	Carbon reduction, climate adaptation, increased renewable energy, energy efficiency					
2.	Air quality, cleaner and healthier air					
3.	Biodiversity					
4.	Contamination, degraded environments, land resources		✓	-		
5.	Flood risk and sustainable drainage systems			-		
6.	Efficient use of water, water quality, Water Framework Directive					
7.	Local distinctiveness, historic environment, heritage, culture and setting					
8.	Landscape and townscape quality, local character and distinctiveness					
9.	Mineral resources		?			
10.	Green space					
11.	Waste treatment and generation					
12.	Housing choice, housing needs		-	-	-	✓✓
13.	Life expectancy, health and mental well-being		✓	✓		
14.	Community, cultural, educational, health, recreational and leisure facilities, public transport, deprived neighbourhoods		✓	✓	-	
15.	Crime		-	?	?	
16.	Need to travel, transport choice, accessibility					
17.	Shopping and commercial services			?		
18.	Employment land and premises, business community needs, socio- economic inequalities		✓✓	✓✓		✓✓
19.	Vitality and viability of centres			-		
20.	Transport network, public transport, cycling and walking					

Compatibility Key:													
✓✓	Major positive effect	✓	Positive effect	-	Neutral effect	×	Negative effect	XX	Major negative effect	?	Effect unknown or uncertain		Effect dependent on implementation

SA Objective (summary of main focus – see pages 11-12 for full SA objective):		Spatial Distribution of Housing	Stoke-on-Trent City Centre	Stoke-on-Trent Railway Station	Newcastle Western Urban Extensions	Berryhill
1.	Carbon reduction, climate adaptation, increased renewable energy, energy efficiency					
2.	Air quality, cleaner and healthier air					
3.	Biodiversity		?	?	X	X
4.	Contamination, degraded environments, land resources			?	?	
5.	Flood risk and sustainable drainage systems					
6.	Efficient use of water, water quality, Water Framework Directive			?		
7.	Local distinctiveness, historic environment, heritage, culture and setting			✓		X
8.	Landscape and townscape quality, local character and distinctiveness			✓		X
9.	Mineral resources	?	?	?		?
10.	Green space					XX
11.	Waste treatment and generation		?	?		
12.	Housing choice, housing needs	✓✓	✓	✓	✓	✓✓
13.	Life expectancy, health and mental well-being					
14.	Community, cultural, educational, health, recreational and leisure facilities, public transport, deprived neighbourhoods		✓	✓		
15.	Crime					
16.	Need to travel, transport choice, accessibility		✓	✓✓		
17.	Shopping and commercial services		✓	✓		
18.	Employment land and premises, business community needs, socio- economic inequalities		✓		✓	
19.	Vitality and viability of centres		✓✓	✓		
20.	Transport network, public transport, cycling and walking			✓✓		

Compatibility Key:

✓✓	Major positive effect	✓	Positive effect	-	Neutral effect	X	Negative effect	XX	Major negative effect	?	Effect unknown or uncertain		Effect dependent on implementation
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SA Objective (summary of main focus – see pages 11-12 for full SA objective):		Green Belt	Hierarchy of Centres	Centre Boundaries	Retail & Leisure Strategic Sites	Out of Town Shopping
1.	Carbon reduction, climate adaptation, increased renewable energy, energy efficiency			?		
2.	Air quality, cleaner and healthier air					
3.	Biodiversity		?	?	?	-
4.	Contamination, degraded environments, land resources		✓	✓		
5.	Flood risk and sustainable drainage systems				?	-
6.	Efficient use of water, water quality, Water Framework Directive	?				-
7.	Local distinctiveness, historic environment, heritage, culture and setting		✓			-
8.	Landscape and townscape quality, local character and distinctiveness	X	✓	✓		
9.	Mineral resources	?	?			?
10.	Green space					
11.	Waste treatment and generation	?				
12.	Housing choice, housing needs	✓	?	-	?	-
13.	Life expectancy, health and mental well-being		✓			?
14.	Community, cultural, educational, health, recreational and leisure facilities, public transport, deprived neighbourhoods		✓	✓	✓	
15.	Crime					
16.	Need to travel, transport choice, accessibility		✓			-
17.	Shopping and commercial services		✓	✓	✓	✓
18.	Employment land and premises, business community needs, socio- economic inequalities	✓				-
19.	Vitality and viability of centres		✓✓	✓✓	✓	✓
20.	Transport network, public transport, cycling and walking		✓			

Compatibility Key:

✓✓	Major positive effect	✓	Positive effect	-	Neutral effect	X	Negative effect	XX	Major negative effect	?	Effect unknown or uncertain		Effect dependent on implementation
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SA Objective (summary of main focus – see pages 11-12 for full SA objective):		Impact Threshold	Green and Open Space	Minerals	Character Areas
1.	Carbon reduction, climate adaptation, increased renewable energy, energy efficiency	?			
2.	Air quality, cleaner and healthier air				
3.	Biodiversity	?			
4.	Contamination, degraded environments, land resources	?		✓	
5.	Flood risk and sustainable drainage systems				
6.	Efficient use of water, water quality, Water Framework Directive	?			
7.	Local distinctiveness, historic environment, heritage, culture and setting	✓		?	
8.	Landscape and townscape quality, local character and distinctiveness		✓		
9.	Mineral resources	?		✓✓	
10.	Green space		✓✓		
11.	Waste treatment and generation		?	?	
12.	Housing choice, housing needs	-		?	
13.	Life expectancy, health and mental well-being		✓	-	
14.	Community, cultural, educational, health, recreational and leisure facilities, public transport, deprived neighbourhoods		✓	-	
15.	Crime			-	
16.	Need to travel, transport choice, accessibility			-	
17.	Shopping and commercial services	✓	?	-	
18.	Employment land and premises, business community needs, socio- economic inequalities		?	-	
19.	Vitality and viability of centres	✓✓	?	-	
20.	Transport network, public transport, cycling and walking			-	

Compatibility Key:													
✓✓	Major positive effect	✓	Positive effect	-	Neutral effect	×	Negative effect	XX	Major negative effect	?	Effect unknown or uncertain		Effect dependent on implementation

Summary Findings of the Sustainability Appraisal for the Preferred Options

Preferred Option	Description	Summary of Sustainability Appraisal:
Preferred Growth Option	The Preferred Options Consultation document sets out the following preferred option for growth: <i>"The preferred option for growth is to deliver the Objectively Assessed Need of a minimum of 199 hectares of employment land and 27,800 new homes between 2013 and 2033 (1,390 new homes per year) as a minimum across the plan area, with some potential uplift to help to deliver wider economic aspirations, flexibility and choice where they can be demonstrated to be deliverable during the plan period"</i>	As this is a high level preferred option, determining the impact on the sustainability objectives is largely dependent on further information about how development will be accommodated, i.e. the location, type and form of development. This Preferred Growth Option does however have major positive effects identified against the objectives to provide housing choice and help meet the housing needs of the whole community and to provide a range of employment land and premises. Most of the comments and mitigation measures identified against the objectives relate to having appropriate planning policies and the selection of sites that will manage development and eliminate or minimise any potential impacts on energy use, air quality, biodiversity and the natural environment, site remediation, flood risk, the historic environment, green space, waste generation and treatment, city and town centres and wider infrastructure such as transport networks, water infrastructure and community services and facilities. These will all need to be addressed as the preferred level of growth is taken forward in the Draft and Final versions of the Joint Local Plan.
Preferred Spatial Option	The Preferred Options Consultation document proposes to divide the plan area in to five distinct strategic areas to reflect the wide range of challenges and opportunities that are present in these distinct locations: <ol style="list-style-type: none"> 1 Stoke-on-Trent City Centre and Railway Station 2 Stoke-on-Trent Urban Area 3 Newcastle-under-Lyme and Kidsgrove Urban Area 4 Newcastle-under-Lyme Western Urban Extensions 5 Newcastle Rural Area 	All of the potential effects were identified as being dependent on implementation. This is a result of the preferred option being focused on setting out the principle of applying five different strategic sub-areas within the Joint Local Plan, rather than providing detailed information about how policies and proposals will be applied through this approach at this stage. The sustainability appraisal for the Draft Local Plan will be able to provide a more thorough analysis of the potential effects of different aspects of this approach.
Preferred Employment Land Supply	230 hectares of employment land has been identified within the plan area that can be delivered between 2013 and 2033. The preferred option is therefore to deliver 15% above the objectively assessed need for 199 hectares of	Most of the potential effects are dependent on implementation as the impacts of the preferred employment land supply will depend on the scale and types of uses that will be accommodated on each site and how the development of these sites will be managed through planning policy. There were potential positive effects identified against objectives to regenerate degraded environments, increasing life expectancy and the health and

Preferred Option	Description	Summary of Sustainability Appraisal:
	employment land over the plan period 2013-2033 to reflect this land supply and to provide choice and flexibility to the market.	mental well-being and the provision of a range of community facilities. A major positive effect was identified against the objective to provide a range of employment land and premises. The employment land supply should be balanced with housing growth which also has economic benefits (through construction and the operation of the housing market). There may be potential pressures on the transport network arising from this land supply and this should be mitigated through transport infrastructure improvements, particularly at major interchanges and hubs.
Quality of Employment Land	This preferred option seeks to deliver the recommendations of the Employment Land Review (2015) by aiming to deliver 75% of the preferred employment land supply for industry and warehousing (B1c, B2 and B8 uses) and 25% for offices and research and development (B1a and B1b uses).	As with the overall employment land supply, the potential effects of this preferred option were identified as dependent on implementation. There were more neutral effects identified for this preferred option, particularly against objectives that were location specific, for example the objectives related to enhancing centres, regenerating degraded environments and reducing development within locations at risk of flooding. This reflects that this preferred option relates to the type of employment land and premises proposed, rather than their location which was covered in the previous preferred option. Potential positive effects were identified for objectives related to improved health and mental well-being and the provision of a more equitable society. There was a major potential positive effect identified for providing a range of employment land and premises. There were no significant potential negative effects identified against any of the objectives for this preferred option. Mitigation measures identified to improve the sustainability of this preferred option included aiming to provide jobs suitable for lower income and skilled groups, as well as higher paid and skilled jobs and the increased focus on Research & Development.
Rural Employment	The preferred option is to prepare a criteria-based policy which takes a positive approach towards rural enterprise but does not allocate land for employment development in the rural area. This would continue the approach towards rural employment set out in the Core Spatial Strategy.	Most of the potential effects identified are dependent on implementation as the potential effect will be determined by the content of the proposed planning policy. In particular, this will need to have regard to conserving, enhancing and promoting interest in the local distinctiveness and the historic environment, strengthening the quality of the landscape, ensuring the provision of associated shopping and commercial services and protecting and enhancing the vitality and viability of village centres. The potential effect against the objective to provide a range of employment land and premises was also dependent on implementation rather than being a potentially positive effect, as the preferred option is to develop a criteria based policy to promote development proposals rather than to identify specific sites and premises. A potential positive effect identified against this objective is again dependent on the content of that criteria based policy.

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

Preferred Option	Description	Summary of Sustainability Appraisal:
	<ul style="list-style-type: none"> District Heat Network 	Park, Stoke-on-Trent Railway Station, Etruria Valley and Festival Park.
Stoke-on-Trent Railway Station	<p>This preferred option would support the delivery of the Stoke-on-Trent Station Masterplan (framework strategy) by improving linkages between the railway station and the city centre, improve capacity at the station by enabling more effective movement of people to and from the station buildings, and provide mixed use development around the station which would include some limited main town centre uses.</p>	<p>This preferred option achieved potentially positive effects against most of the social and economic objectives. In particular there were major positive potential effects identified against the objectives to reduce the need to travel, increase transport choice and accessibility and to increase the use of public transport. The potential effects against these objectives are a direct result of the proposal to develop the area around Stoke-on-Trent Railway station, which should increase the range of uses in the area and increase the activity and use of this major transport hub. Recommended measures to maximise these positive effects were to ensure that the station and associated transport infrastructure are able to accommodate the increased demand generated from intensified use and activity in the area and to ensure that any main town centre uses that are developed in this location are not to the detriment of Stoke Town Centre. There was more uncertainty against environmental objectives, with many potential effects depending on how development is implemented, in particular with regard to the objectives to adapt to a changing climate, improve air quality, reduce the amount of development at risk of flooding and enhancing the quality and accessibility of green space. There were potential positive effects identified against the objectives to conserve and enhance the historic environment and assets due to the presence of listed buildings and conservation areas, these potential effects could be identified as a major positive if the reuse of historic buildings and assets and developments within their setting are undertaken in a sympathetic way.</p>
Newcastle Western Urban Extensions	<p>The preferred option targets the release of land within the Green Belt in locations adjacent to the major urban area of Newcastle Town. The aim of doing so is to increase land supply to assist with accommodating the Preferred Growth Option and to contribute towards realising the vision and objectives of the Joint Local Plan.</p>	<p>Most of the potential effects identified against the objectives are dependent on implementation. There were positive potential effects identified against the objectives to provide housing choice and a range of employment land and premises. There was also a minor negative potential effect identified against the objective to ensure that there is an overall net gain in the extent and quality of biodiversity. This is because of the loss of existing natural features in the area and close proximity of Ancient Woodland. The recommended mitigation measures to improve the sustainability of the preferred option include ensuring that relevant planning policies and the allocation of land for development in this location address potential impacts and seek to achieve an overall improvement to biodiversity, as well as bringing about improvements to landscape, open space, community services and facilities and transport infrastructure.</p>
Berryhill	As the largest preferred site its delivery would	Most of the potential effects identified against the objectives are dependent on

Preferred Option	Description	Summary of Sustainability Appraisal:
	<p>help to provide a wide range of housing sites across the plan area. The importance of the site's ecology, heritage and landscape character is recognised and the preferred option proposes to manage the delivery of development in a sensitive way which would see pockets of residential development in "garden neighbourhoods". This would be supported by improvements to green infrastructure and transport infrastructure, in particular the delivery of the Hanley-Bentilee Link Road.</p>	<p>implementation. There are also a small number of objectives where both positive and negative potential effects were identified. The negative potential effects were identified against the objectives to ensure an overall net gain in the extent and quality of biodiversity, the quality of the landscape and city townscape, local distinctiveness and to maintain and enhance the quality and accessibility of green space. These negative potential effects were identified due to the recognition within the preferred option that Berryhill has existing landscape, ecological and green space value. There are however enhancements that can be to these objectives through appropriate planning policies, designations and allocations to ensure that development within Berry Hill is implemented in a sensitive way. A major positive potential effect was identified against the objective to provide housing choice and help to meet the housing needs of the whole community.</p>
Green Belt	<p>The preferred option includes targeted releases of land within the Green Belt adjacent to the major urban areas of Newcastle Town and Kidsgrove Town. The aim of doing so is to increase land supply to assist with accommodating the local authority's development need and to contribute towards realising the vision and objectives of the Joint Local Plan.</p>	<p>Most of the potential effects identified against the objectives are dependent on implementation and depend on which areas are released from the Green Belt and how their future use is managed. There are potential positive effects identified against the objectives to provide housing choice and a range of employment land and premises, as these are given as the main drivers of release from the Green Belt under the preferred option. There was one minor negative potential effect identified against the objective to strengthen the quality of the landscape and townscape, which reflects that the release of land from the Green Belt is likely to have a subsequent effect on openness. Mitigation measures to address this will be to ensure that any future development on land that is released makes an overall enhancement to landscape and townscape.</p>
Preferred Hierarchy of Centres	<p>A new hierarchy of centres is proposed to replace that currently defined in the Core Spatial Strategy. It proposes four tiers, with the strategic centres of Stoke-on-Trent City Centre and Newcastle Town Centre as Tier 1, followed by urban town centres at Tier 2, district and local centres at Tier 3 and rural or neighbourhood centres at Tier 4. The purpose of the new hierarchy is to reflect the needs of the community that each centres serves, with larger centres fulfilling a regional and sub-regional role whereas smaller centres provide a more localised role.</p>	<p>This preferred option has a range of potentially positive effects. Most of these are minor potential positive effects identified against the objectives to conserve promote and enhance local distinctiveness, the historic environment and assets, strengthening the quality of landscape and townscape, regenerating degraded environments, the provision of community and leisure services, improving health and mental wellbeing, reducing the need to travel and increasing the use of public transport. There was a major potential positive effect identified against the objective to protect and enhance the vitality and viability of centres as this is the most relevant objective to this preferred option. Mitigation measures to improve the sustainability of this preferred option are mainly focused on ensuring that there are a range of services and facilities available in each centre that are appropriate to the size of that centre and its place in the hierarchy, and that these services and facilities are accessible to both existing and new residents and communities across the plan area.</p>

Preferred Option	Description	Summary of Sustainability Appraisal:
Centre Boundaries	The town and city boundaries currently identified in Stoke-on-Trent in the saved policies from the City Plan 2001 and the Core Spatial Strategy Proposals Map have been reviewed. This has led to some changes being proposed to the boundaries of Stoke-on-Trent City Centre, Longton Town Centre, Stoke Town Centre and Tunstall Town Centre. These changes are proposed to cover recent developments of main town centre uses or identified opportunities for future development of these uses. In Newcastle, no changes are currently proposed to existing boundaries but it is proposed to fix Newcastle Town Centre's boundary to follow the ring road.	Most of the potential effects are dependent on how this preferred option will be implemented, but there are also some notable positive effects. In particular there is a major potential positive effect identified against the objective to protect and enhance the vitality and viability of centres but there are also minor potential positive effects identified against the objectives to strengthen the quality of landscape and townscape, regenerate degraded environments and the provision of community, leisure, shopping and commercial services. Recommended mitigation measures to improve the sustainability of this preferred option largely depend on the content and focus of proposed policies to manage the types of uses to be accommodated within the boundaries and ensuring that there are no detrimental impacts on the historic and cultural environment and assets or on the distinctive landscape and townscape of the centres and their surrounding areas.
Key Strategic Sites for Retail and Leisure Provision within Centres	Ten development schemes are identified in the Tier 1 and 2 centres, where major retail and leisure uses will support their future prosperity, vitality and viability. Further detail about the development of these ten schemes is proposed to be set out within the Draft Local Plan.	Most of the potential effects are dependent on how this preferred option will be implemented, however there are some potentially positive effects identified against the objectives for the provision of community, leisure, shopping and commercial services and the objective to protect and enhance the vitality and viability of centres. Recommended mitigation measures to improve the sustainability of this preferred option are largely focused on the design and form of development on these strategic sites, to ensure that heritage, landscape, townscape, public realm and transport and accessibility links are enhanced and adversely impacted on. The recommendations also include an emphasis on ensuring that the development of these strategic sites encourage a greater range of activities and uses in their centres and that these take place throughout the daytime and evening to encourage more people to visit.
Out of Town Shopping	The Preferred Options Consultation document recognises that there have previously been a number of large scale retail and leisure uses developed outside of the city and town centres. Whilst recognising that these out of centre development fulfil a specific role, the preferred option is to not expand these areas and ensure that they remain complementary to, and not	There were a range of potential effects identified against the objectives for this preferred option. Many were neutral or dependent on implementation but there were also two positive potential effects identified against the objectives relating to enabling access to the widest range of shopping and commercial services and to protect and enhance the vitality and viability of centres. The reasons for these potential positive effects were because the preferred option recognises the existing retail and service provision in out of centre locations but seeks to restrict their further expansion in the interest of focusing development towards the city and town centres. Recommended mitigation measures to improve the sustainability of this preferred option include ensuring that these locations are

Preferred Option	Description	Summary of Sustainability Appraisal:
	compete with the proposed hierarchy of centres.	accessible using a range of transport modes, that the design of future redevelopment within these existing out of centre locations has a positive impact on landscape, townscape and access to green space and wider services and facilities.
Impact Threshold	A range of thresholds are proposed to be applied to major edge or out of centre retail developments to trigger a requirement for an assessment to be undertaken to determine the impact that they may have on Tier 1 and 2 centres. The thresholds proposed to be applied are for retail developments that exceed 1,500 square metres where there may be an impact on Tier 1 centres, 1,000 square metres where there may be an impact on Tier 2a centres and 300 square metres where there may be an impact on Tier 2b centres or lower tiers in the proposed hierarchy.	There were a range of potential effects identified against the objectives for this preferred option, most of which were unknown, uncertain or dependent on implementation. There were some positive potential effects identified against the objectives to conserve, enhance and promote interest in local distinctiveness, enable access to shopping and commercial services and to protect and enhance the vitality and viability of centres. The latter was identified as having a major potentially positive effect, given that the intention of the preferred option is to have strong policies to restrict the impact of out of centre retail on existing centres. Due to the specific scope of this preferred option, there were limited relevant mitigation measures that can be recommended to improve its sustainability but those that were suggested included ensuring that cumulative impacts of different out of centre development schemes are taken in to account and that the preferred option should seek to support the achievement of an overall range and choice of uses within existing centres.
Green and Open Space	The councils preferred option is to provide a network of green and open space which supports the objectives of area's open and green space strategies. The preferred option will support target levels of open space provision and improve the quality of the network in terms of open space functions it provides within accessible locations from existing and future communities.	Most of the potential effects were identified as uncertain or dependent on implementation. Positive potential effects were identified against the objectives to increase life expectancy, improve health and mental well-being and provide the widest range of community, cultural and leisure services and facilities. A major positive potential effect was identified against the objective to maintain and enhance the quality and accessibility of green space, as this is the main focus of this preferred option. Mitigation measures that were recommended to improve the sustainability of this preferred option include ensuring that improvements are also made to biodiversity, the historic environment, landscape and townscape, accessibility by active modes of travel and that the design of green spaces leads to reductions and not increases to crime or the fear of crime.
Minerals	Planning for Mineral resources in Newcastle-under-Lyme is the responsibility of Staffordshire County Council and so this preferred option relates only to Stoke-on-Trent. It proposes to continue to safeguard appropriate areas of the city to ensure that development does not sterilise the potential to extract identified and viable	Most of the potential effects were identified as either neutral or dependent on how this preferred option will be implemented. There were unknown or uncertain potential effects in regard to conserving, enhancing and promoting local distinctiveness, encouraging self-sufficiency in waste treatment and providing housing choice. There was a minor positive potential effect identified against the objectives to reduce contamination, regenerate degraded environments, re-use materials and maintain soil, geological and land resources and a major positive effect identified against the objective to ensure the

Preferred Option	Description	Summary of Sustainability Appraisal:
	mineral reserves.	efficient use of mineral resources. Recommended mitigation measures to improve the sustainability of this preferred option include ensuring that sites are properly remediated after extraction to ensure that the environment does not become degraded and that remediated sites can be considered for redevelopment to other uses such as housing, employment or green space.
Character Areas	In accordance with the Preferred Spatial Option, it is proposed to breakdown the plan area in to more detailed Character Areas. These will reflect the distinctive areas that exist within both authorities and set out specific policy responses to cater for the individual needs of each area. They are also intended to enable more direct engagement with local communities.	All of the potential effects were identified as being dependent on implementation. This is a result of the preferred option being focused on setting out the principle of applying character areas within the Joint Local Plan, rather than providing detailed information about how policies and proposals will be applied through this approach at this stage. The sustainability appraisal for the Draft Local Plan will be able to provide a more thorough analysis of the potential effects of different aspects of this approach.

6. Conclusions

- 6.1 This section summarises the overall findings from the sustainability appraisal of the Joint Local Plan Preferred Options that are set out in more detail in the preceding sections of this report. It also outlines the next steps for the sustainability appraisal of the Joint Local Plan as it continues to be prepared.

Revised Joint Local Plan Objectives

- 6.2 The Strategic Options Consultation document set out a proposed vision, six aims and twenty seven objectives to guide the direction of the Joint Local Plan period up to 2033. Following the public consultation period for the Strategic Options, amendments were made to seven of the plan objectives.
- 6.3 The changes made to the seven plan objectives can be summarised as follows;
- Inclusion of supporting and boosting entrepreneurship and digital connectivity;
 - Having a range of sites capable of delivering the type and mix of housing required;
 - Enhancement of the countryside, wildlife and habitats in addition to their improvement;
 - Encouragement, rather than prioritisation, of the development of sustainable brownfield land;
 - The role of Stoke-on-Trent City Centre and Newcastle Town Centre to attract more visitors to the area and to support new employment opportunities and job growth;
 - Facilitating the development of leisure, arts and cultural attractions;
 - Reference to historic assets rather than historic heritage.
- 6.4 The previous sustainability appraisals that were undertaken for the plan objectives have been revisited and amended where appropriate. Only one change to the previous appraisals was considered to be necessary; the change of emphasis from prioritising to encouraging the development of brownfield land reduced the potential effect of the SA objective to *'reduce contamination, regenerate degraded environments, re-use materials and maintain soil, geological and land resources'* from minor positive to neutral.

Preferred Options

- 6.5 There are 19 preferred options that are being subject to public consultation at this stage of plan production. These range from very broad preferred options such as the levels of housing and employment growth to be delivered within the plan area between 2013 and 2033 and the principle of splitting the plan area up into broad spatial areas and character areas, through to more specific preferred options such as identifying major development schemes that have a major role in contributing to the preferred level of growth, the proposed new hierarchy of centres and the impact thresholds to be applied for major out of centre retail developments.

- 6.6 When appraised against the sustainability objectives, most of the potential effects of these preferred options were identified as being dependent on implementation. This is not unexpected at this stage of plan production, as the broad nature of the preferred options means that being able to identify the potential effects often depends on how the preferred option will be implemented through planning policies, allocations and designations which will follow at the Draft Local Plan stage. This applies in particular against the sustainability objectives which have a specific focus, for example objectives 1, 2, 5, 6, 10 and 20 which relate to matters including carbon reduction, climate change, air quality, flood risk, water resources, green space and transport networks.
- 6.7 There were a notable number of potential positive effects identified against some of the preferred options, particularly in regard to the Spatial Distribution of Housing and all of the Key Strategic Developments which were assessed positively against the sustainability objectives for providing housing choice and meeting the housing needs of the community (SA objective 12). The Preferred Spatial Option, Employment Land Supply, Rural Employment, Stoke-on-Trent City Centre and Newcastle Western Urban Extensions were assessed positively against the sustainability objective to provide a range of employment land and premises to meet the needs of the business community and tackle socio-economic inequalities (SA objective 18). The preferred options relating to retail and centres (Hierarchy of Centres, Centre Boundaries, Retail & Leisure Strategic Sites, Out of Town Shopping and Retail Impact Thresholds) were all identified as having potential positive effects when assessed against the sustainability objectives to enable access to the widest range possible of shopping and commercial services (SA objective 17) and to protect and enhance the vitality and viability of the city, town, district and village centres (SA objective 19).
- 6.8 A smaller number of potential negative effects were identified against the Newcastle Western Urban Extensions and Berryhill preferred options. Both had potential negative effects identified against SA objective 3 which relates to biodiversity, as both of these locations contain or are located in close proximity to designated areas or protected habitats. Berryhill also had potential negative effects against the SA objectives relating to local distinctiveness, the historic environment, cultural assets, landscape and townscape quality, and the quality and accessibility of green space (SA objectives 7, 8 and 10).
- 6.9 As most of the potential effects were dependent on implementation, most of the recommended measures to improve the sustainability of the preferred options referred to having appropriate policies and proposals in the Draft Local Plan that support the SA objectives. This may involve developing planning policies which directly relate to the topics covered by the SA objectives. This recommendation is particularly relevant to the Preferred Spatial Distribution of Housing as housing developments can have an effect on a wide range of sustainability matters.
- 6.10 Specific improvement measures that were recommended against individual preferred options are summarised as follows;

- **Preferred Employment Land Supply:** improvements to transport infrastructure, particularly at major interchanges and hubs.
- **Quality of Employment Land:** aim to cater for a wider range jobs, for lower income and skilled groups, higher paid and skilled jobs, along with the increased focus on Research & Development.
- **Stoke-on-Trent City Centre:** the design and form of development schemes should be appropriate to the City Centre location. Benefits of development should be shared with deprived communities in the area and improve accessibility to nearby key locations such as Hanley Park, Central Forest Park, Stoke-on-Trent Railway Station, Etruria Valley and Festival Park.
- **Stoke-on-Trent Railway Station:** ensure that the station and associated infrastructure can accommodate the increased demand generated from greater use and activity in the area. Main town centre uses developed in this location should not be to the detriment of Stoke Town Centre. Development involving historic buildings, assets and settings should be undertaken in a sympathetic way.
- **Newcastle Western Urban Extensions:** development should deliver overall improvements to biodiversity, landscape, open space, community services and facilities and transport infrastructure.
- **Berryhill:** development should be implemented in a sensitive way that improves and does not harm landscape, ecology and green space.
- **Green Belt:** development on land released from the Green Belt should make overall improvements to landscape and townscape.
- **Preferred Hierarchy of Centres:** a range of services and facilities appropriate to the size of each centre and its place in the hierarchy to be available and accessible to residents and communities.
- **Centre Boundaries:** development within the new boundaries should not detriment the distinctive landscape and townscape of the centres, nor their historic and cultural environment, assets or settings.
- **Key Strategic Sites for Retail & Leisure Provision within Centres:** development of these sites should encourage a greater range of uses that increase activity throughout both the daytime and evening.
- **Out of Town Shopping:** locations to be accessible via a wide range of transport modes and any new development should improve landscape, townscape and access to green space.
- **Impact Threshold:** cumulative impacts of out of centre developments to be considered.
- **Green and Open Space:** future provision to seek improvements to biodiversity, the historic environment, landscape, townscape, accessibility via active modes of travel and reductions in crime and fear of crime.
- **Minerals:** remediation to take place after extraction to ensure a high quality environment and redevelopment to other uses such as housing, employment or green space.

Next Steps

- 6.11 The findings from this Sustainability Appraisal Report and that of the Strategic Options Consultation (which appraised the reasonable alternatives to the preferred approach) will be used to inform the development of the more detailed planning policies, site allocations and designations of land within the Draft Joint Local Plan.
- 6.12 As established in the Methodology chapter, this next stage of plan production and subsequent stages will also be subject to sustainability appraisal. Regulation 22 of the Town and Country Planning (Local Planning) (England) Regulations 2012 requires that a Sustainability Appraisal Report is to be submitted alongside the Final Local Plan. The submitted Sustainability Appraisal Report will subsequently be considered by an independent Planning Inspector as part of Examination in Public for the Joint Local Plan.
- 6.13 It is also proposed to publish Equality Impact Assessments, Health Impact Assessments and Habitat Regulation Assessments as and when appropriate, as these detailed policies and site proposals are identified during the Joint Local Plan production process.

Glossary

Affordable housing: Comprises of social rented, affordable rented and intermediate housing for households whose needs are not met by the market. Social rented housing is owned and rented out to households by local authorities, private registered providers or other approved landlords. Affordable rented housing is let under similar arrangements but at no more than 80% of the local market rent. Intermediate housing comprises of homes for sale and rent and can include shared equity (shared ownership and equity loans) and other low cost homes for sale and intermediate rent.

Air Quality Management Areas: Areas designated by local authorities because they are not likely to achieve national air quality objectives within certain specified deadlines.

Ancient woodland: An area that has been wooded continuously since at least 1600 AD.

Appropriate Assessment: Stage 2 of the Habitat Regulations Assessment process. If it cannot be ruled out that there will be no significant effects on European Sites then Stage 2 – Appropriate Assessment is required to assess whether there will be any adverse effects on European Sites.

Brownfield land: see ‘previously developed land’

Core Spatial Strategy: The existing, overarching development plan document for Newcastle-under-Lyme and Stoke-on-Trent. It sets out the long-term spatial vision for areas, the spatial objectives and strategic policies and proposals to deliver that vision. The Core Spatial Strategy was adopted by both Councils in 2009 and will be replaced by the Joint Local Plan.

Cumulative: the impact of a number of elements together.

Development Plan/Development Plan Documents (DPDs): planning strategies and policies to direct the future development of an area. They include Local Plans and neighbourhood plans (as defined in section 38 of the Planning and Compulsory Purchase Act 2004) and are prepared by the local planning authority or qualifying neighbourhood plan body in consultation with the community.

Draft Local Plan: this stage of the plan production process follows on from this Issues consultation and the forthcoming Strategic Options stage. It is at this stage that both Councils will present their preferred strategy and planning policy approaches to address the planning issues raised in this paper and any other issues that arise through the plan production process.

Ecological networks: sites and corridors of biodiversity importance that are linked together.

Economic development: Development that generates jobs and economic growth. This can include industrial uses, warehousing, offices, retail and leisure.

Employment Land Review: This is an evidential study that identifies different levels of economic and employment growth over the plan period and the amount, type and location of land that is best suited to meeting the projected levels of growth.

Equality Impact Assessment: process for assessing the potential equality impact of a plan or programme.

Examination in Public: Before it can be adopted, a Local Plan must be examined by an independent inspector whose role is to assess whether the plan has been prepared in accordance with legal and procedural requirements, and whether it is considered 'sound'. To be 'sound' a document must be positively prepared, justified, effective and consistent with national policy.

Green Belt: Designated areas of countryside surrounding large urban areas. These are designated to prevent urban sprawl, safeguard the countryside from encroachment, prevent towns from merging together, and preserve the setting and character of historic towns and to assist regeneration within the urban areas. Green Belt boundaries can only be amended when the local plan for the area is reviewed.

Green infrastructure: A network of multi-functional green space which is capable of delivering a wide range of environmental benefits and quality of life benefits for local communities. Green infrastructure can encompass both urban and rural areas.

Habitat Regulations Assessment: "The Habitats Directive (Council Directive 92/43/EEC of 21 May 1992) requires competent authorities to decide whether or not a plan or project can proceed having undertaken the following "appropriate assessment requirements" to:

- Determine whether a plan or project may have a significant effect on a European site (Stage 1)
- If required, undertake an appropriate assessment of the plan or project (Stage 2)
- Decide whether there may be an adverse effect on the integrity of the European site in light of the appropriate assessment"⁴

Health Impact Assessment: is a way of assessing potential health impacts of plans, policies and projects. The process includes recommendations aimed at minimising potential negative impacts on health and maximising positive ones.⁵

Heritage Asset: 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. Heritage asset includes designated heritage assets such as Scheduled Ancient Monuments, Listed Buildings, Registered Park and

⁴ Defra (2012) Habitats Directive Guidance on competent authority coordination under the Habitats Regulations July 2012 page 1

⁵ World Health Organisation website (2015) <http://www.who.int/hia/en/>

Gardens, Registered Battlefields or Conservation Areas as well as assets identified by the local planning authority (including local listing).

Historic environment: All aspects of the environment resulting from the interaction between people and places through time, including all surviving physical remains of past human activity, whether visible, buried or submerged, and landscaped and planted or managed flora.

Housing Market Area: this is the area within which the local housing market operates. The extent of the Housing Market Area is defined within the Strategic Housing Market Assessment (see separate entry below).

Intermediate Housing: A type of affordable housing (see 'affordable housing')

Local Plan: The Joint Local Plan is being prepared by the city council and borough council to guide future development across the two local authority areas. The final, adopted version of this development plan document will detail the strategy for development across the two areas up to 2033 and will contain detailed policies which Stoke-on-Trent City Council and Newcastle-under-Lyme Borough Council will use to manage future development.

Local Planning Authority: The public authority whose duty it is to carry out specific planning functions for a particular area, such as creating planning policies or deciding planning applications. Stoke-on-Trent City Council and Newcastle-under-Lyme Borough Council are the local planning authorities for their respective areas.

Main town centre use: Retail development, leisure, entertainment facilities, offices, arts, culture and tourism development. Examples include shops, cinemas, restaurants, bars and pubs, night-clubs, casinos, health and fitness centres, indoor bowling centres, bingo halls, theatres, museums, galleries, hotels and conference facilities.

Mineral Safeguarding Area: An area covering known deposits of minerals which are desired to be kept safeguarded from unnecessary sterilisation by non-mineral development. In the Joint Local Plan area Stoke-on-Trent City Council and Staffordshire County Council are responsible for designating Mineral Safeguarding areas.

Monitoring: Involves the collection and analysis of data and statistics to understand how patterns of development are changing. An example of this is the collection of housebuilding statistics. Monitoring data can show how effective planning policies are in influencing development. Such information is reported by local planning authorities in their Authority Monitoring Report (AMR).

National Planning Policy Framework (NPPF): The Government's planning policies for England, which provide a policy framework that sets the parameters under which Local Plans and Neighbourhood Plans should be prepared, and decisions on planning applications should be made.

National Planning Practice Guidance (NPPG/PPG): The Government's more detailed online guidance on national planning policies, which adds further detail to the NPPF.

Objectively Assessed Housing Need (OAN): also called a 'full, objective assessment of housing needs' (FOAN), this is an assessment undertaken within the Strategic Housing Market Assessment (see separate entry below) which identifies the extent of the need for new housing, without being influenced by planning matters such as the ability of the land supply to accommodate the levels of development – these matters are considered within the Local Plan preparation process.

Open space: Space of public value, including not just land, but also areas of water (such as rivers, canals, lakes and reservoirs) which offer important opportunities for sport and recreation and can act as a visual amenity.

Out of centre: A location which is neither within nor on the edge of a town centre.

Planning policy (plan-making): A function of local planning authorities that prepares planning policies and development plan documents to direct decisions on development proposals within the authority's area.

Pollution: Anything that affects the quality of land, air, water or soils and which might lead to an adverse impact on human health, the natural environment or general amenity. Pollution can arise from a range of emissions, including smoke, fumes, gases, dust, steam, odour, noise and light.

Previously developed land: Land which is or was occupied by a permanent structure. This excludes land occupied by agricultural or forestry buildings, restored land previously used for minerals extraction or landfill and private residential gardens.

Renewable and low carbon energy: Includes energy for heating and cooling as well as generating electricity. 'Renewable' covers sources of energy that occur naturally and repeatedly, for example wind, water, sun and also biomass and geothermal heat from below the ground. Low carbon technologies are those that can help reduce emissions (compared to conventional use of fossil fuels).

Retail Impact Threshold: The National Planning Policy Framework sets out that under the retail impact assessment test, local authorities should require an impact assessment if a proposed development is over a locally set floorspace threshold. If an application for out of town development fails to satisfy this test it should be refused.

Saved policies: Older local plan policies that can remain in place following a direction given by the Secretary of State under the Planning and Compulsory Purchase Act 2004. A list of currently saved policies in Newcastle-under-Lyme or Stoke-on-Trent is available on the websites of either authority.

Site allocation: a site designated within a development plan document for a specific type of use. For example, housing, employment or retail development.

Social housing, or social rented housing: A type of affordable housing (see 'affordable housing')

Strategic Environmental Assessment: The Strategic Environmental Assessment Directive requires that an assessment is made of plans and programmes which could have significant environmental effects. SEA is a tool used in plan-making to assess the likely effects of the plan when judged against reasonable alternatives. Schedule 2 of the Environmental Assessment of Plans and Programmes regulations 2004 identifies the process and considerations when undertaking assessments of plans or programmes.

Strategic Housing Market Assessment (SHMA): this is an evidential study that examines the extent and the operation of the local housing market. It also identifies the extent of the housing needs that exist or are likely to arise within the defined housing market area.

Strategic Options: this is the next stage in preparing the Joint Local Plan. At this stage the different ways that the issues identified within this paper can be addressed will be explored. For example this could include identifying how much development could be accommodated in different areas within both authorities. No particular solution will be fixed at this stage as this will be done within the draft local plan. Further issues to consider may however be identified at the Strategic Options stage.

Sustainability Appraisal: An assessment of the impacts of policies and proposals on economic, social and environmental objectives, i.e. 'sustainable development'.

Sustainable development: Development which contributes to meeting the long term economic and social needs of the community, whilst balancing this against the need to avoid creating an unacceptable long term impact on the environment.

Sustainable transport: Any efficient, safe and accessible means of transport with overall low impact on the environment, including walking and cycling, low and ultra low emission vehicles, car sharing and public transport.

Viability: Refers to the financial implications of development. If the costs of development do not allow for a sufficient financial return to the developer then the development will not be viable. Viability can be affected by the costs of developing the land, the costs of providing wider benefits such as open space or affordable housing, and the sale value of the completed development.

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NEWCASTLE-UNDER-LYME BOROUGH COUNCIL

EXECUTIVE MANAGEMENT TEAM'S REPORT TO CABINET

4 January 2018

A NEW ECONOMIC DEVELOPMENT STRATEGY FOR THE BOROUGH

Submitted by: Neale Clifton, Executive Director, Regeneration and Development

Principal author: Kim Graham, Economic Development and Regeneration Manager

Portfolio: Corporate and Service Improvement, People and Partnerships

Ward(s) affected: All

Purpose of the Report

To report, for Members' consideration, a first draft of the new Economic Development Strategy for the Borough 2018 – 2023.

Recommendations

- (a) That the Draft Economic Development Strategy, taking into account the views of the Economic Development and Enterprise Scrutiny Committee and subject to modifications suggested by Cabinet, be used as a basis for consulting with partner organisations, local businesses and wider community.
- (b) That comments received are reported back for Cabinet's consideration.

Reasons

To act as a basis for taking action to strengthen the local economy.

To develop consensus amongst local partners about priorities for action consistent with the Council's corporate priority "Borough of opportunity".

1. Background

The Council's Regeneration team have been working on a refresh of the current Economic Development Strategy 2012 – 2017. The Draft Economic Development Strategy (EDS) 2018 - 2023 will take account of the numerous changes to both local

and national government and the opportunities and challenges associated with these changes.

It is proposed the focus of the EDS is on four key areas that are aligned to the Stoke and Staffordshire Local Enterprise Partnership, Draft Strategic Economic Plan, which is due to be consulted upon November 2017. The key areas are Business Intelligence and Support, Place and Infrastructure/Sites and Premises, Skills and Innovation.

The EDS is driven by the Council Plan “Our Newcastle Plan 2020” to create a borough that is prosperous, clean, healthy and safe. It is designed to provide a framework for the Regeneration and Economic Development Team along with others involved in the economic development and promotion of the borough. Our corporate priority is to create a borough of opportunity to improve the economic prospects of the area for everyone living, working and visiting here.

The strategy is reported here in draft form and this will be Cabinet’s first opportunity to comment and shape it. The level of support given to the broad direction and content of the strategy will clearly have a strong bearing on its success. Similarly, the wider consultation process is designed to

- Inform partners of the Borough Council’s draft proposals
- Provide partners with the opportunity to influence and refine those proposals
- Influence partners’ own proposals.

2. Issues

The strategy is designed to form a basis for the Borough Council’s intervention and policies to promote the development of the local economy and wider benefits for all. It is also intended to influence the plans of other bodies involved in the economic development of the Borough and focuses on the following areas:

- **Business Intelligence and Support** – Objective: Growth and sustainability of the business base. Focus on support and development of SME’s, knowledge intensive sectors, professional and business services sector and the borough’s successful logistics sector. Also, optimise the benefit to local companies from public sector procurement.
- **Place and Infrastructure / Sites and Premises** – Objective: Physical transformation. Focus on Keele Science and Innovation Park, the Ryecroft development, the Enterprise Zone land at Chatterley Valley, Newcastle BID and the town centres and new sites for housing and employment through the Joint Local Plan.
- **Skills** – Objective: Increase skills and encourage more people into training, apprenticeships and jobs. Focus on support for people furthest from training and jobs, delivery of the SSLEP Skills Strategy and the Locality project, address skills gaps through Keele and Staffordshire Universities and Newcastle and Stafford College Group and stimulate demand for higher skills.
- **Innovation** – Objective: Ensure that we take full advantage and build on the strengths of innovation in our area. Focus on further development of Keele University and the Science and Innovation Park, encourage a greater level of innovation amongst our local businesses, make the most of the med-tech

sector, monitor the influence of Artificial Intelligence (AI) and automation on trends and skills requirements for future jobs.

To deliver our key priorities, we work in partnership with Staffordshire County Council, Stoke on Trent City Council, the Stoke and Staffordshire Local Enterprise Partnership, Keele University, Newcastle under Lyme Business Improvement District and The Constellation Partnership. The strategy is also informed by The Midlands Engine, emerging UK Industrial Strategy and will be informed by the proposed post Brexit UK Shared Prosperity Fund.

3. **Options Considered**

The draft strategy proposes a number of actions in each area of activity. Consultees may offer other more effective or more achievable actions. These will be considered and reported back. This draft is the basis for consultation with our partners.

4. **Comments received from Scrutiny Committee**

At the EDE Scrutiny meeting held 18 September it was suggested that a SWOT analysis (Strengths, Weaknesses, Opportunities and Threats) should be included in the draft strategy. It was also suggested that a paragraph should be added to describe the role of automation and the strategy should focus more on role of SME's (small and medium enterprises). It was also suggested that more emphasis on rural communities should be included.

5. **Proposal**

Subject to comments by Cabinet, it is proposed to consult on this draft more widely amongst partner organisations, local businesses and wider community.

6. **Reasons for Preferred Solution**

The draft appended to this report has been developed in line with the Stoke and Staffordshire Local Enterprise Partnership, Strategic Economic Plan, together with the more specific needs of the Borough and from initial soundings from four groups focusing on Business, Employment and Skills and Place and Infrastructure, which have helped shape and add content. Further refinement will be provided through the consultation process.

7. **Outcomes Linked to Corporate Priorities**

The strategy is driven by the Council Plan – “Our Newcastle Plan 2020” to create a Borough that is Prosperous, Clean, Healthy and Safe. The Draft EDS focuses on Creating a Borough of Opportunity to encourage investment and inclusive growth in the Borough which will bring jobs and improve prosperity as well as improving the well-being of our citizens and their communities.

8. **Legal and Statutory Implications**

There is not a strict requirement on the Council to prepare an economic development strategy though clearly developing policies, committing resources and making investment against a rational set of agreed objectives is good business practice.

9. **Equality Impact Assessment**

No differential impact had been identified.

10. **Financial and Resource Implications**

There are staff resource implications arising from the preparation of the strategy.

11. **Major Risks**

The principal risk of *not* preparing a strategy for the promotion of economic development is that staff resources are committed and financial investment made without reference to the things which the Council and its partners consider to be most important.

There is no obvious risk to preparing a strategy in itself, other than perhaps raising expectations from Members, staff and partners that everything in it will be achieved – but this simply reflects the inherent risk of setting objectives and targets. The strategy itself does not commit the Council to specific actions, these will be the subject of more detailed reports.

12. **Key Decision Information**

This strategy will impact on two or more wards and has been included in the Forward Plan.

13. **Earlier Cabinet Resolutions**

14. **Recommendations**

That the Draft Economic Development Strategy, taking into account the views of the Economic Development and Enterprise Scrutiny Committee and subject to modifications suggested by Cabinet, be used as a basis for consulting with partner organisations, local businesses and wider community.

That comments received are reported back for Cabinet's consideration.

15. **List of Appendices**

Draft Newcastle-under-Lyme Economic Development Strategy 2018 – 2023
SWOT analysis
Borough Profile

Management Sign-Off

	Signed	Dated
Financial Implications Discussed and Agreed		
Risk Implications Discussed and Agreed		
Legal Implications Discussed and Agreed		
H.R. Implications Discussed and Agreed		
ICT Implications Discussed and Agreed		
Report Agreed by: Executive Director/ Head of Service		

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Draft Economic Development Strategy 2018 – 2023

DRAFT

This Economic Development Strategy (EDS) is about how Newcastle-under-Lyme Borough Council (NULBC) will work with the business community, local partners and wider community to improve the economic prospects for everyone living and working in our Borough.

The strategy is driven by the Council Plan – “Our Newcastle Plan 2020” - to create a Borough that is ‘Prosperous, Clean, Healthy and Safe’. The EDS focuses on ‘Creating a Borough of Opportunity’ to encourage investment and inclusive growth in the Borough which will bring jobs and improve prosperity as well as improving the well-being of our citizens and their communities.

The Council will seek to use its assets both in terms of commercial portfolio and community assets to support the economic development of the Borough. We recognise the provision of such facilities plays an important role in supporting small and medium sized enterprises (SMEs), businesses and community based organisations that provide valuable services in our community.

The strategy also reflects our links to the Council’s Stronger and Safer Communities Strategy which highlights the importance of partnership working between the Council and its key partners, which is integral to the delivery of inclusive growth.

The Strategy is closely aligned to the Stoke and Staffordshire Local Enterprise Partnership (SSLEP) Strategic Economic Plan and reflects the inclusive growth approach, which is detailed in the emerging post-Brexit, UK Shared Prosperity Fund.

Add borough map...

Strategy at a glance

The Strategy will set the context for long-term investment for the whole of our borough.

Each section sets out a series of priorities the Council proposes to take forward and looks at the strengths which the Borough has to offer, the opportunities which may be capitalised on and develops proposals which take advantage of these.

A number of challenges are identified relating to the economy, skills, perceptions of place and interventions to address or mitigate them.

Newcastle is changing. All around us we see new development, which in the town centre will result in over 2000 student accommodation spaces for Keele and Staffordshire University students by 2020 as well as a bespoke dementia care facility “Belong Village” providing 100 accommodation spaces and 150 new jobs.

Castle House will be the new town centre hub for the Council, Staffordshire Police, Staffordshire County Council, Newcastle Library, Newcastle Registry Office and Aspire Housing Group.

This will make the existing Civic Offices site available for the planned Ryecroft retail and housing development, with completion planned for 2020. We recognise this development is a once in a generation opportunity, which will change the shape of the town centre and boost business and confidence in the area.

Over the last few years, working with our partners at Newcastle Business Improvement District (NBID), the Creative People and Places Programme - Appetite and The New Vic Theatre, the towns emerging cultural economy has grown from strength to strength.

The focus has been on celebrating the life and legacy of Philip Astley, founder of the modern circus, inventor of the circus ring and born in Newcastle 1742. Recent investment from Arts Council England and Heritage Lottery Fund (HLF) amounts to over £1M to celebrate the importance of Philip Astley to the cultural heritage of the town. Newcastle will be at the heart of the 2018 celebrations, “C250”, to mark 250 years since the first circus.

Since the borough became a HLF Priority Development Area in 2015, over £3M has been secured from HLF to support a wide range of cultural heritage projects right across the borough.

The Council will continue to approach this strategy by building a broad consensus, through consultation with our partners, with the local business community and wider community who will help to influence the work that the Council should undertake and will also play their own part in delivering elements of this strategy.

A key element of the approach will be prioritisation. The Council (and ever reducing public budgets in general) can't do everything. It is important to focus on the things which are going to have the greatest impact and which the Council is best placed to influence. Where possible, we will follow the principal that ‘resources follow priorities’.

Some of our priorities are sub-regional, rather than specific to the Borough, and here we will work closely with our partners such as Stoke on Trent City Council, Staffordshire County Council, Stoke and Staffordshire Local Enterprise Partnership (SSLEP), The Constellation Partnership and The Midlands Engine.

The strategy's action plan sets out in greater detail who will lead on each activity, what it will achieve and how this will be resourced.

Strategic alignment

District Deal

We work in partnership with Staffordshire County Council to deliver the District Deal, which focuses on the following key priorities for delivering economic regeneration benefits to the communities of our borough.

- Newcastle Town Centre Ryecroft Development
- Public Sector Service Hub (Castle House)
- University town
- Newcastle Business Improvement District (NBID)
- Kidsgrove Town Centre Partnership (Go Kidsgrove)
- Villages and rural communities
- Keele University Science and Innovation Park
- Strategic transport
- Knutton Enterprise Centre

Keele University

Keele University and Keele Science and Innovation Park are both located within our Borough and we recognise the unique contribution they make to the local area. The Stoke and Staffordshire Strategic Economic Plan (SEP) identifies the Science and Innovation Park as the premier development site in North Staffordshire.

The Council is one of five partners signed up to a plan for investment in innovation-led growth called The New Keele Deal, which is a plan for £70 million of investment by Keele University, Staffordshire County Council, Stoke-on-Trent City Council, Newcastle-under-Lyme Borough Council, University Hospitals of North Midlands NHS Trust and the Stoke-on-Trent and Staffordshire LEP, which sets out eight development priorities over the next five years:

- Keele Research and Innovation Support Programme (KRISP)
- Mercia Centre for Innovation Leadership (MCIL)
- Smart Energy Network Demonstrator (SEND)
- NHS-University-Industry collaboration
- Harnessing global reach and visibility for local economic impact
- A strategic site of The Constellation Partnership
- Higher level educational provision
- A spatial masterplan for the University campus and local area

The Council recognises the University is a priority investment site which will help to accelerate economic growth across our Borough as well as further afield. We will continue to support the University's growth plans in accordance with existing planning policies.

The Stoke-on-Trent and Staffordshire Local Enterprise Partnership (SSLEP)

The Stoke-on-Trent and Staffordshire Local Enterprise Partnership (SSLEP) was formed in 2011 and brings businesses and local authorities together to drive economic growth and create jobs. The vision is to create 50,000 jobs and grow the economy by 50% in the next 10 years by building on the region's strong transport links, educational institutions and high quality of life to ensure that Stoke-on-Trent and Staffordshire continues to be an attractive place to live, work and do business.

The SSLEP wants to make Stoke-on-Trent and Staffordshire the best place in Britain to do business and focuses on providing the support that businesses need whether they wish to start-up, grow or relocate.

The SSLEP has a single inward investment team Make it Stoke-on-Trent and Staffordshire and an Education Trust, which is working with education providers and businesses to address the skills gap, while Destination Staffordshire is working with tourism businesses to market the county as a place to work and visit.

The SSLEP Strategic Economic Plan focuses on five main objectives – City, Connected County, Competitive Urban Centres, Sector Growth and Skilled Workforce. This is informed by an evidence base recently gathered, which focuses on Infrastructure and Place, Site and Premises, Skills, Innovation, Business Intelligence and Growth. This EDS is aligned to delivering these.

The Constellation Partnership

The Council is one of seven local authorities along with two Local Enterprise Partnerships, which form The Constellation Partnership. The partnership has strong ministerial backing from Government and a unified fast-track approach to plan-led economic development. The partners share a single vision - a single economic footprint creating a coherent investment market boosted by the international investment magnet of High Speed Rail connectivity. The partnership's ambition is to deliver 100,000 new homes and 120,000 new jobs by 2040.

The Midlands Engine

The Midlands Engine is focusing on five priority areas to improve connectivity, strengthen skills, support enterprise and innovation, promote the Midlands and enhance quality of life. It plans to create 300,000 new jobs and £34billion worth of growth over the next 15 years to 2030.

UK Industrial Strategy

The emerging Industrial Strategy focuses on 10 pillars; Investing in Science, Research and Innovation, Developing Skills, Upgrading Infrastructure, Supporting Businesses to Start and Grow, Improving Procurement, Encouraging Trade and Investment, Delivering Clean Energy and Clean Growth, Cultivating World-Leading Sectors, Driving Growth across the whole Country, Creating the right Institutions to bring together Sectors and Places

Brexit

With Brexit talks still at an early stage we can only assume at this point that the regeneration of our areas, including the funding we have be accustomed to accessing, will change and we will have to re-think our approach whilst living through these uncertain times.

The Industrial Communities Alliance recognises the unique needs of older industrial areas such as our own, which have benefited greatly from EU Structural Funds such as European Regional Development Funding and European Social Fund. Going forward The Alliance is suggesting a post-Brexit regional policy that is well funded, strongly targeted, within and between regions, driven by objective evidence of need and opportunity, tailored to local tasks in hand, flexible in delivery and managed locally and democratically.

Business intelligence and support - growth and sustainability of the business base

The economic pressures resulting from Brexit, the 2017 Rates revaluation, the development of HS2 and increasingly rapid evolution in technology to name but four will impact significantly on local prosperity over the life of this strategy. Whilst we can't predict exactly what affect these and other external forces will have on local business, we will endeavour to mitigate them through the strategic aims set out below.

1. Continue to develop an economy in which the growth of innovative and niche businesses can flourish to increase both the amount of knowledge intensive employment and the proportion of high quality jobs in new and traditional sectors.

The most successful places are those that build on their existing strength and develop diverse specialisms. This is the Council's strategic approach to promoting the Borough, attracting new business and increasing employment opportunities. North Staffordshire boasts a number of niche industrial specialisms which have been highlighted as providing significant opportunities for growth. While the Council will continue to work with its partners in the LEP and The Constellation Partnership on sub-regional objectives, it will focus on promotion of Newcastle's distinctiveness, as reflected in:

- A differentiated town centre offer working with the BID and specific marketing activities aimed at attracting inward investment and new business start-up in the town centres.
- A strong professional and financial services sector
- Prospects for providing a balance of high quality and affordable housing including accommodation for almost 2000 students in our town centre
- A thriving research based university and science and Innovation Park

2. Developing a co-ordinated approach to business support which puts business first and supplies a relevant mix of services that is well publicised and accessible to all businesses.

We will continue to work with the areas strong network of business support providers such as the Growth Hub who encourage the growth and development of new and existing enterprises across the borough. We also benefit from a network of enterprise centres which offer a supportive environment to new enterprises and in some cases the capacity to grow on to larger units where required.

We will continue to work with the LEP and with partners to develop a range of measures designed to support business development including:

- Promotion of the area as a premier investment location at a national and international level using the 'Make it' brand
- Continue to work with our single point of contact for business, the Growth Hub
- Development of a business mentoring service
- Support for rural businesses through the Rural Enterprise Grants and the Leader programme
- Support to deliver broadband access and superfast broadband across the area and particularly in rural areas
- Access to finance for business investment via the LEP and other partners

We will continue to support the services of the Growth Hub and other partners by signposting and promoting them to local businesses and seeking to be more proactive in informing businesses of opportunities available to them.

The Growth Hub, which is a public/private sector partnership, funded through Regional Growth Fund, helps to drive strong, sustainable business growth by joining up national and local business support, making it easier for businesses to find the help they need.

The Stoke and Staffordshire Business Helpline is the first point of contact for business support across Staffordshire, including accessing the Growth Hub. The helpline provides a central point of contact for a range of free (and paid for) business support which includes start up, growth, finance, regulation, people and contacts.

- Where the Council is able to add value to the Growth Hub, for example through co-ordination or hosting activities, this will also be on offer.
- Although the opportunity to attract external funding is now much reduced, the Council will support co-ordinated bids, where the opportunity arises, to attract funding for enterprise activity.
- The Council recognise the importance of catering for the needs of existing businesses as well as supporting start-ups and will support improving networking and communications with and between local companies.

3. Support activities which encourage entrepreneurialism and new business formation. We need to address the business formation rate in Newcastle, which is still below the regional and national average and business survival remains a challenge with a business failure rate that is slightly above the national average.

Developing entrepreneurs starts at an early age, and in addition to the actions that our partners already take to support enterprise in schools, the Council will continue to support the Newcastle Employment and Skills Group, the LEP Locality project and the Carousel of Opportunity, which focuses on primary schools, to develop innovative ways to engage young people in enterprise

We will support continuation of the annual Newcastle Business Boost competition. This brings together public, private and education sectors in support of local businesses and, since its inception in 2008, has provided in excess of £80,000 direct investment in their growth and development

We will continue to signpost businesses to appropriate sources of assistance, including those offered by the Council such as rates advice, licensing, waste disposal, planning and environmental health. We will ensure that advice on the council's website is kept up-to-date and includes links to appropriate partner sites

4. Supporting our higher and further education establishments in the development of knowledge intensive sectors.

Newcastle benefits from being home to both Keele University and Staffordshire University is just a few miles away in Stoke on Trent.

The study range of offered courses between the two includes science, creative, technology, business and humanities opportunities for research and study. These are the drivers of the area's knowledge intensive jobs both through enterprise support to graduates and through the accommodation and services offered to business.

Growth plans for Keele include an increase from the current 10,500 students to 13,000 with further potential expansion contributing up to 6,000 jobs and £0.4billion per year to the regional economy.

The University's Strategic Plan 2015-20 sets out how it will bolster its role as a centre of excellence, research, teaching and scholarship and boost economic growth, in particular

innovation-led high value employment growth. The expansion of the University and Science Park is necessary to sustain Keele's nationally important position, given the highly competitive environment in which the University must compete for key staff, students, businesses and research commissions.

The Borough is also home to Newcastle under Lyme College, (Newcastle and Stafford College Group since 2016).

NSCG is financially one of the strongest of its kind in the country with very high success rates, amongst the top 10 per cent nationally. The group is currently home to a population of over 5,000 full-time students, around 620 students on higher education programmes, over 2,000 part-time or adult learners and 2,000 apprentices with over 800 individual employers.

- **Specialist business accommodation**

Keele University and Science and Innovation Park is the Borough's flagship accommodation offer to knowledge intensive industries. The high specification of the innovation centre buildings and the strong links to the university naturally attracts businesses specialising in research and development and higher level skills. IC5 opened in 2016 with plans for further specialist accommodation during the life of this strategy.

- **Keele University business gateway**

This is the university's single point of contact for the services it offers to business including research and innovation support, Knowledge Transfer Partnerships, licencing opportunities and smart energy network demonstrator.

- **Low carbon and environmental sustainability**

Keele University and Science and Innovation Park is the primary driver for growth in the environmental sustainability field. In addition to the Science and Innovation Park accommodation and business offer, the university is committed to developing an environmentally aware and outward facing campus with an extensive commitment to carbon reduction including plans to introduce renewable energy on campus and BREEAM 'very good' status to all new and refurbished buildings.

Keele University Sustainability Hub acts as a focus for the research into, teaching of, and management for sustainability and green technology that takes place at Keele University. Building upon this the university aims to significantly expand its capacity in energy / renewables research, particularly around wind, solar and geothermal.

The LEP area has a strong cluster of companies within the environmental technologies sector, including the District Heat Network and many renowned international brands such as Siemens and General Electric. These companies already invest heavily in research and development, and this could be actively supported by high quality academic research to create truly innovative energy solutions.

- **Manufacturing**

Newcastle has a strong manufacturing base which employs a significant number of people. Support for this sector is principally delivered through working with the SSLEP Education Trust and Staffordshire STEM (Science, Technology, Engineering and Maths) centre to ensure the workforce possesses the skills that enable them to meet market needs and innovate effectively.

Inward investment of manufacturing companies is supported through Make It and ensuring there is suitable employment land available for development in the Borough.

- **Applied material**

Originally a part of the SSLEP City Deal, the work to develop the Applied Materials Research, Innovation and Commercialisation Company (AMRICC) highlighted the potential to build upon existing strengths of materials companies and innovation in the area. Comprising a research laboratory, pilot plant and educational facility, AMRICC will provide an environment which joins together scientific success with the business acumen needed to make innovation a commercial reality. A number of companies at the heart of this sector are based in the Borough, including, KMF Sheet Metal Fabrication and Precision Engineering and Intelligent Orthopaedics.

- **Medical technologies**

The medical technologies sector is still relatively small in terms of employment numbers, although employment in scientific research and development (R&D) in medical technologies has grown over the last few years. The School of Medicine at Keele University, the University Hospital of North Midlands NHS Trust and Keele University Science and Innovation Park represent an opportunity for attracting more growth in this area.

The Research Institute at Keele University focuses on four key themes for research: Bioengineering and Therapeutics; Clinical and Diagnostic Science; Infection, Inflammation and Immunity; and Neuroscience and Metabolism. A number of leading medical technology and healthcare companies are based at Keele including TRB Chemedica, Biocomposites, Cobra Biologics and Intelligent Orthopaedics.

- **Creative industries**

Digital creative firms continue to be a potential growth area for the Borough. A number of highly respected video production companies set up by Staffordshire University students exist in the area already. Attracting, growing and retaining this type of firm relies on the availability of superfast and reliable broadband, the right style of business premises and the opportunity to cluster with other digital technology firms. Further actions include:

- Working with the LEP and its partners in the higher and further education sectors aiming to encourage the growth of creative industries, promote technology transfer and provide specialist business accommodation
- The Council will support the re-use of existing property in the town for businesses such as graphic design, film and media, publishing, animation, music and computer/console games software development including, where suitable, its own premises
- The Council will continue to work with Keele University and Science Park to encourage development of Keele Science Park Phase 3 and attract knowledge intensive businesses to Keele Science Park through marketing support, lobbying for infrastructure investment and planning advice.

6. **Making the most of existing strengths in the professional and business services and logistics sectors.**

Professional and business services are an important knowledge intensive sector for the Borough. The improvement in broadband connectivity, development of new technologies and new working practices coupled with good transport links means that this sector offers

the potential for continued growth. Our approach is based around three main activity areas:

- Ensuring the availability of appropriate accommodation (both commercial and residential), which is necessary to attract and retain highly skilled workers in these sectors.
- Support the growth and diversification of the rural economy. A number of potential funding streams are available to rural businesses during the first few years of this strategy, including new build and conversions to business use. The roll out of superfast Broadband continues making the Borough's rural hinterland an increasingly attractive option for business start-ups.
- Logistics has been a major growth area in our economy which is due largely to the good connectivity that the area enjoys and our position close to the centre of the country.
- Through the Ceramic Valley Enterprise Zone the Council plans to continue the development of Chatterley Valley on land to the west of the JCB Blue Planet building, (described as Chatterley Sidings and Peacock Hay). We will work with the landowners and their agents to explore bringing forward Peacock Hay for light industrial development.

7. Making the most of business opportunities in the tourism and leisure sectors

The Borough is home to a number of business and leisure tourist destinations including the Brampton Museum and Art Gallery, the Dorothy Clive Garden, the New Vic Theatre, Apedale Community Heritage Park, the Trent and Mersey canal and famous Harecastle Tunnel, Newcastle town centre and Keele University.

Its central location also makes it a good resting place for visitors to other parts of the county. We work closely with Enjoy Staffordshire, the Destination Management Partnership for the county, which is the main organisation responsible for promoting the area to business and leisure visitors. They also recognise the importance of sector specific support to develop skills and products amongst local tourism businesses. We will:

- Promote diversification amongst rural businesses, for example through the LEADER programme and Rural Enterprise Programme.
- Work with the town centre BID to encourage new businesses into the town centre.
- Work with the BID to maximise the opportunities afforded by the growth of student accommodation in Newcastle town centre, expected to reach 2000 by 2018.

8. Optimise the benefit to local companies from public sector procurement.

Over the life of this strategy, the Council will continue to identify ways of making savings and reducing its spend on procuring goods and services. However, even this reduced amount could represent significant income for local businesses. The councils spend profile includes a significant number of lower value contracts which are particularly suitable for smaller businesses.

The council also considers social value in awarding contracts and is keen to engage with all types of providers, including small and large businesses and social enterprises. New ways of working will be considered such as joint ventures with other partners and procurement models from other areas of the country that encourage tenders from small businesses.

There remains a statutory requirement to advertise all larger high value contracts through the Official Journal of the European Union. This will be monitored as Brexit begins to gather pace.

The Council will also comply with the requirement to advertise any contract over £25,000 on Contracts Finder. The council will support measures that make it easier for smaller businesses to tender for these and will also support emerging processes to standardise tender documentation.

Place and infrastructure – physical transformation

This section of the Economic Development Strategy sets out what action the Council will carry out to enhance the quality of the place and infrastructure of the Borough to promote its economic development.

Improving the town's retail offer

The age, size and configuration of many of Newcastle's retail premises, many of which are nineteenth century, are valued as being aesthetically pleasing but are not necessarily what modern retail businesses require. However, these premises do lend themselves to the independent sector, from dog-boutiques to gin bars!

The market continues to be an integral part of the life of the town centre. The Council recognises the importance of the market and it has partnered with Market Place Management, an award winning market operator that has a wealth of experience in the market sector to take forward the delivery of markets in Newcastle town centre from February 2018.

There is strong competition from out of town retail locations such as Trentham Retail Village, Wolstanton Retail Park and Festival Park, all of which provide free parking and the convenience of level, single storey shop units. But, Newcastle's growing reputation as a town for independents, especially in the food and drink sector, has helped the town centre to remain buoyant.

The town centre vacancy rate is currently 13%, which is above the West Midlands average and which we expect to decrease over time, due to the large number of students moving in to the newly built accommodation.

The shape of our town centre is changing as we see huge developments such as The Sky Building emerging from the former Jubilee Baths site. The site stands at one of the main entrances to the town and will provide accommodation for 244 students with views directly over Queen's Gardens and newly built Castle House.

The former Bristol Street Motors site just on the edge of the town centre will provide another 499 apartments for students and key workers and the former Blackburn House site, now named Keele House, provides another 147 student apartments.

The Council, in partnership with the County Council, acquired the former Sainsbury's site on the northern edge of Newcastle Town Centre and, through a competitive process, Henry Davidson Developments (HDD) was appointed to deliver a £50 million investment in the town. This will provide 65,000 sq. ft. of new retail accommodation in 10 or 11 units, mostly of a size and configuration not currently provided in the town centre with a view to appealing to the modern retailer.

HDD's plans will also make provision for 513 apartments which will add to the footfall and general 'busyness' of the town, increase spending in local shops and also add to the townscape appeal of the scheme as a whole.

In terms of jobs, it is expected that the Ryecroft retail scheme will result in around 350 additional jobs and that Castle House, as well as accommodating the existing staff based at the Civic Offices, will also accommodate a further 100 office jobs currently located elsewhere in the Borough. The new residential development will result in additional jobs in the town centre as well, as a result of the additional spending in local shops and other services estimated at around £30 million per year.

The 'Belong Village' development mentioned earlier in the strategy, on the site of the former Maxims Nightclub, will also provide a new gallery, funded through HLF, which will link to the town's existing Brampton Museum and Art Gallery and strengthen the town's arts and cultural offer.

Providing for new business accommodation

For many years the Council has promoted the aim of accommodating more business space in and around the town centre, both to strengthen the role of the town and to increase its vitality. Town centres are also the most sustainable location for housing a workforce, given their accessibility by means other than car and the proximity of shops and other services to a daytime workforce.

The establishment of the Ceramic Valley Enterprise Zone (which includes Chatterley Valley West) will provide some opportunity for Council investment in new business space since it will be a requirement of the EZ governance that the retained business rates will be invested into Growth Priorities. In the Borough these are Keele Science and Innovation Park, Newcastle Town Centre and Chatterley Valley.

As a result, once future rate income arising from development at Chatterley Valley West can be accurately calculated, borrowing can be made against this figure and a schedule of investment in new business accommodation to meet market need can be put to the LEP.

Improving the public realm

Newcastle has arguably the most attractive town centre in the North Staffordshire conurbation. Its inherent attractiveness is down to a number of factors including:

- Attractive groupings of well-maintained Georgian and Victorian buildings around the town
- A safe and convenient pedestrianised environment
- The street market
- The large number of cafes, bars and restaurants around the town and
- A relatively low shop vacancy rate

All of this helps to convey an ambience and a sense of place which masks a number of economic challenges that the town faces. On its own, enhancing and protecting the best features of the town's public realm will not bring new investment into the town but helps to influence investment decisions and add to the pleasure of visiting, shopping, living in or working in the town.

The Council will improve the public realm by:

- Selectively investing in valued buildings, particularly those 'at risk'. This may include the use of conservation grants, such as those made toward the improvement of Mellard's Warehouse or be a factor in negotiating land deals, such as that which helped to enable the refurbishment and re-development of the former Maxim's nightclub to the Belong Village.

- Working with the county council in investing and helping to design improvements to the streetscape, such as that which improved the partially pedestrianised High Street, associated investment in new market stalls, improvements to Red Lion Square and improved pedestrian access to Newcastle Bus Station.
- Commissioning artists to create designs for the town centre roundabouts and subway entrances and working with the County Council on structural refurbishments, all of which help to make the town more accessible and safer for pedestrians.
- Investment in, and continued improvement to, the town's parks and gardens, such as the Queen's Gardens, The Brampton, Station Walks, Grosvenor Gardens and Queen Elizabeth Park, mainly financed through neighbouring development schemes or sponsorship.
- Making use of our town centre public spaces to present arts and cultural events.

Working with Newcastle BID (Business Improvement District)

The Council supported the establishment of a town centre Business Improvement District (BID) in 2015, run by the local business community and funded from an additional levy on the business rates on businesses in and around the town centre. This now operates as an independent entity to promote the town, develop the distinctive Newcastle under Lyme experience, and support growth, development and investment.

The Council partners with the BID in promoting positive news about the town centre and working to encourage landowners and local businesses to invest in the quality of the visitor experience. It also helps it to develop funding applications to secure investment from external bodies such as Arts Council England (ACE) and the Heritage Lottery Fund (HLF).

The Council has also worked with the BID to gain Purple Flag accreditation, which is a prestigious award for those towns who manage their night life to an excellent standard by providing an entertaining, diverse safe and enjoyable night out. Newcastle has held Purple Flag status since 2014.

Helping Keele University Science and Innovation Park to grow

Keele University is one of the UK's top ranked universities, and together with its Science and Business Park is a key motor of the North Staffordshire economy. Helping it to grow and thrive will be critical to the future success of the area, ensuring that the sub-regional economy is fit for a future which will be typified by rapid technological change.

Overall the university currently contributes £125 million per year into the local economy and supports around 3400 FTE jobs in Stoke-on-Trent and Newcastle, including 1750 directly, 350 through its supply chain, 440 from staff and student spending in the local area and a further 810 working for firms based at the Science Park (source: Regeneris Consulting).

In a relatively low waged economy such as North Staffordshire, the calibre of jobs supported by the University and Science Park is particularly valued. Many of the jobs at the University are in highly skilled academic, managerial and professional professions with high pay and prospects of career progression. Those working for firms at the Science Park are in growing sectors such as medical technologies, energy, IT and advanced materials.

The University is consistently recognised in national surveys for its student satisfaction rating, graduate employment and affordability and its graduates are officially recognised as the most employable in the country. In 2017 the university has achieved Gold Standard in the Teaching

Excellence Framework, first in the world for Green Setting and Campus Infrastructure and University of the Year for Student Experience.

In order to provide for the University's growth ambitions and to ensure that North Staffordshire maximises the full potential of this prestigious University, the Borough Council has worked alongside the University and the County Council to commission a masterplan for a Newcastle Western Expansion, based around the university campus and adjoining land to the north (a former Municipal Golf Course) and south (toward the A53).

This aims to provide for a sustainably designed form of development, on the shoulder of the North Staffordshire conurbation, where high quality employment and high quality housing are provided on 'garden settlement' principles where land value capture provides an income stream to meet the costs of the necessary infrastructure investment and for the long term stewardship of shared assets.

The emerging masterplan is based on the 'Innovation District' model which sees the creation of co-located working and living environments in a much denser urban form to the existing campus layout. It would not be possible to reproduce this form of development anywhere else in North Staffordshire, since nowhere else has the co-location and critical mass of university, the concentration of knowledge-based industries and the potentially superb residential environment.

Providing 3000 additional high quality jobs and 2700 new houses in a superb living and working environment will have a transformative impact not only on the local economy but also on the local housing market, helping to counter outmigration of high earners (usually to remoter rural villages some distance from the Stoke/Newcastle urban area) and to attract new people to the area.

The University plans to redevelop part of its older central core to a higher density, complete the development of its current Science Park (Keele Science Park phase 3, where IC5 and the new Centre for Autism Research are being built) including the development of four further Innovation centres and a hotel and conference facility and provide for a further 22 hectares extension to the science park for further development. Regeneris Consulting estimate that as a result of these growth plans the total quantifiable economic contribution of the University and Science Park will have doubled to over 7000 FTE jobs by 2040.

Realising the wider benefit of housing development

New housing development is a significant driver of inclusive growth through the local supply chain as people use local professional services to fit out and furnish their new houses. Over the longer term, an increased resident population means more money spent in local shops, cafes, restaurants, leisure providers and a whole host of businesses dependent on consumer spending.

One of the Borough's economic aims is to significantly raise the number of new houses built in the Borough each year from its modest current annual average of 297 (2012-2017) in order to address the current housing shortage and to provide housing choice

A key factor in formulating new housing proposals in the forthcoming Joint Local Plan, currently being put together in partnership with Stoke on Trent City Council, will be the consideration of its impact across our borough, planning factors such as green field/brownfield, density, sustainability and design will all be considered.

Significant housing development is being included in plans for the Newcastle Western Extension around Keele University as well as new employment proposals. This will provide a mix of housing including provision for housing appealing to higher income groups, provision for self-build plots and affordable housing in line with the Council's policy.

Maximising the benefit of High Speed Rail (HS2)

Plans for HS2, the high speed rail link between London, Birmingham and the North, have been developed by The Government and HS2 Ltd. to transform the national rail system.

HS2 will significantly reduce travel times between London and the key regional cities of Manchester, Leeds, Sheffield, and Birmingham and so improve the attractiveness of these 'northern' cities for future investment and links with the Government's strategy for 'The Midland Engine' and 'The Northern Powerhouse'.

The Government announced in November 2016 that the construction of HS2 Phase 2a (the section from Birmingham to Crewe) HS2 has been accelerated and will now be completed by 2027.

Through the establishment of a partnership of Local Authorities in Cheshire and North Staffordshire, which is called The Constellation Partnership, work is underway to maximise the economic advantage that can be gained from the siting of the planned new Rail Hub near to Crewe Railway Station with the aim of bringing together a better HS2 service with the existing rail network.

The Constellation Partnership will showcase key sites within the Borough for development including Keele University Science and Innovation Park and the Ceramics Valley Enterprise Zone (which includes Chatterley Valley). It has appointed an independent Chair and has commissioned a Growth Strategy comprising spatial plans, a development viability study, financial modelling, masterplans for Crewe and Stoke Railway Stations, a skills supply chain and local labour strategy.

Making provision for inward investment and for local firms to grow

We want businesses to prosper in our borough and there are some things the Council can do to help. These include a low tax environment, the availability of attractive and affordable development sites and premises which are accessible to the primary road network and for the local workforce, and adequate car parking.

Chatterley Valley, a 40-hectare development site in the north of the Borough, is one of six sites in North Staffordshire which comprise the Ceramic Valley Enterprise Zone where, as an incentive for investment, businesses are not required to pay business rates for the next 25 years. The Council is working with the developers, Harworth Estates and with the County Council to bring forward the development of this site through help with the provision of a new site access and a 'can-do' planning regime. Potentially this site could bring around 1500 new jobs to the area in addition to the JCB investment made at Blue Planet on former Council owned land adjacent.

Newcastle Town Centre hosts the Borough's principal collection of professional services companies, many of which are housed along King Street, Queen Street and The Brampton. In order to attract more such businesses (and retain those which exist) lessons need to be learned from the provision in Etruria Valley. We recognise that businesses often prefer modern office premises and need convenient on-site car parking (which town centre premises are rarely able to offer). The Council will work with developers to bring forward potential sites with business needs in mind and will continue to work with the 'Make It' Inward Investment Service to attract firms to available premises in and around the town.

During the last 25 years considerable development of employment land has taken place across the Borough including the development of the whole of Lymedale Park, Phase 2 of Keele Science Park (including the first five Innovation Centres and the School of Medicine), Centre 500, High Carr Business Park, phase 1 of Chatterley Valley (JCB), Silverdale Enterprise Park, Knutton and Silverdale Industrial Estates, Rosevale Business Park, the later phases of Parkhouse Industrial Estate, and parts of West Avenue and Rowhurst Industrial Estates.

Together these comprise over 150 hectares of development land resulting in an estimated 7500 to 8000 jobs. And, significant sites within and on the edge of Newcastle Town Centre have also been redeveloped - the Newcastle College and Performing Arts Centre on Knutton Lane, the new Sainsbury's, the new Fire Station, the Aldi development at Blackfriars and the new Travelodge.

The local development plan 2013-2033

The Newcastle/Stoke-on-Trent Employment Land Review 2015 (one of the sources the next local plan will rely on to identify need) identified the need for between 44 and 133 hectares of employment land in the next local plan period, 2013-2033.

The review also identified that there was an existing supply of 85 hectares of employment land in the Borough. The local plan issues consultation document therefore concluded that it will be critical for additional sites to be identified if full economic growth is to be realised over the plan period.

The new Joint Local Plan will identify a major employment site of 45 – 50 hectares to address the current shortage of available development land in the mid-term. Only once sites are identified in an approved Local Plan can steps be taken to marshal the resources (people, money and commitment) to bring forward development land, not least the necessary highway infrastructure and off-site services. This will have implications for future bids for Government funding and financial support from Staffordshire County Council as well as funding allocated through the UK Industrial Strategy and post Brexit UK Shared Prosperity Fund.

Marketing, promotion and cultural economy

Marketing and promotion in the Borough is primarily carried out by three organisations, which are supported by the Council both financially and through investment in staff time:

- Make It Stoke and Staffordshire

Within North Staffordshire, enquiry handling and promotion of the area as an inward investment and business growth location is primarily carried out by the Make It Stoke-on-Trent & Staffordshire team. The 'Make It' team has a county-wide remit and provides key links for Newcastle to both Staffordshire wide and regional marketing initiatives.

- Enjoy Staffordshire

The 'Enjoy Staffordshire Partnership' is the County's principal agency for promoting the area to visitors, including its principal attractions such as its theme parks, gardens, ceramic factories and tours, canals, and the nearby Peak District, all of which are easily accessible from Newcastle. More indirectly, Destination Staffordshire's promotional campaigns play an important role in raising the public profile and appeal of the area to a national audience which inevitably impacts on the perceived desirability of the area as a place to live, in terms of staff recruitment and, indirectly, on business location decision-making.

- Newcastle BID and Go Kidsgrove CIC

The BID was established in 2015, to support all businesses and organisations in the town within the BID levy area. The BID has three Objectives:

1. Promotion of the town – its key strengths and characteristics as a vibrant, university, market town and build awareness of its retail, leisure and professional services sectors and its college, regionally and nationally.

2. Development of the distinctive Newcastle experience – that is a safe, attractive and appealing experience for visitors, students, residents and workers to enjoy.
3. Growth, Development and Investment – to build on the strengths of the businesses and organisations of the town to support and promote growth, development, investment and sense of business community.

Go Kidsgrove is the brand name for Kidsgrove Town Centre Community Interest Company. This is a business led initiative for town centre businesses. It has been set up as a Community Interest Company, which was incorporated in September 2013.

The Board of Directors comprises representatives from local businesses supported by Newcastle-under-Lyme Borough Council and Kidsgrove Town Council. The main purpose of Go Kidsgrove is to work in partnership with local businesses and organisations to build on the town's key strengths and cultural heritage through the development of a programme of events and activities.

Kidsgrove is also home to Borough's railway station which currently has direct links to Crewe, Derby, Manchester, London and Stoke on Trent. 2018 will see £4M investment in the station to improve pedestrian access and car parking for the annual 230,000 customers. This will help to realise the aspiration of Kidsgrove becoming a transport hub.

There may be potential through HS2 to improve connectivity from Kidsgrove and local stations Stoke on Trent and Crewe. We will work with our partners in the Constellation Partnership to gain more detailed information once this becomes available.

Cultural Economy

We recognise the value of placing arts and culture at the heart of our town to create a vibrant place that people enjoy.

Brampton Museum, set in the beautiful Brampton Park, attracts 56,000 visitors annually to view existing collections and the programme of arts and contemporary makers. Working with our partners over the last few years we have built a positive reputation for delivering high quality cultural activities that celebrate our unique cultural heritage.

Working with Newcastle BID, Appetite Creative People and Places Programme and Arts Council England (ACE), we have presented the best of national and international new circus at the heart of our town centre and have drawn huge crowds who have returned year on year.

In 2012 we became a Priority Development Area for Heritage Lottery Funding (HLF), which meant we were allocated dedicated officer time to provide information sessions and advice on potential project ideas. This has resulted in over £3 million investment from HLF in the area for a wide range of projects including support for the Philip Astley profile-raising work.

Internationally acclaimed No Fit State circus will return to Newcastle for almost two months to rehearse and present their new show Lexicon as part of the wider Circus, Past Present and Future project managed by The New Vic Theatre. We believe this will place Newcastle firmly on the cultural tourism map, build on the attractiveness of our town to encourage more visitors and support our local businesses.

Skills - addressing issues around the skills agenda

The Newcastle Employment and Skills Group (NESG) has been established in Newcastle for 10 years and brings together key providers who deliver in Newcastle along with the Council, the core membership is the Aspire Group, Newcastle and Stafford College Group, DWP/Job Centre Plus, National Careers Service, Business Enterprise Support, Support Staffordshire, Staffordshire County Council – Libraries and Adult Learning.

One of the priority focus areas is to help people who are claiming ESA (Employment Support Allowance) into training and work, especially those who are struggling with mental health issues.

The LEP Skills Strategy provides a framework within which to address the skills gaps through more focus on schools and business working together, further education and business working together and higher education providers and business working together.

Since 2009 we have been working with partners to successfully deliver the Carousel of Opportunity, which is aimed at primary school students to introduce them the career opportunities available in the current jobs market. A 'speed-dating' format is used to introduce a wide range of career options from engineers to administrators and dog-wardens to IT specialists.

Long-term worklessness

Although we currently have historically low Job Seekers Allowance (JSA), Income Support and Universal Credit levels, which are running at 1.3% (1085) we still have almost 4000 people who have been out of work over a longer period of time claiming Employment Support Allowance (ESA). These are the people who are furthest from the training and jobs market who require more intensive support from a range of agencies.

Up to 6% of people claiming ESA are living with mental ill health – listed as 'Mental and Behavioural Disorders'.

The Employment and Skills team at Aspire Housing continues to support customers to become less dependent on benefits by helping them to gain employment, whilst tackling generations of worklessness that resided in many neighbourhoods.

The Aspire Employment and Skills Team has also delivered a range of externally funded employability contracts over the years, including DWP, Coalfields Regeneration, NHS and Staffordshire County Council funded contracts. During 2017/18 team has started to deliver several ESF funded employability contracts aimed at enhancing the employability of local people in our borough.

Apprenticeship LEVY

We know that apprenticeships provide people with the chance to learn and to gain nationally recognised qualifications whilst receiving a weekly wage. They are also recognised in the SSLEP Apprenticeships Strategy 2015-2017 as a key component in the drive to increase employability and growth and a main route for increasing participation in education and training.

The most significant change to apprenticeships has been the introduction by central Government of the Apprenticeship Levy April 2017, which aims to create 3 million quality apprenticeship starts over the next 5 years. All large businesses with a pay bill over £3 million have to pay the levy of 0.5% of their annual pay bill.

NSCGs (incorporating Newcastle-under-Lyme College, Stafford College and training provider Axia Solutions) provides expert advice, guidance and support on all aspects of work based learning, including: apprenticeships, traineeships, bespoke training and professional development. The

Staffordshire Providers Association (SPA) provides a network of Staffordshire training providers many of which are based in Newcastle. Two of the main local providers are PM Training and Newcastle and Stafford College Group (NSCG).

Volunteering

We recognise that formal volunteering opportunities can offer similar routines to regular paid work and can help people who are unemployed build their confidence and self-esteem to help them get back into training and work.

Working towards getting the right skill mix to increase productivity (skills strategy)

The Council will continue to work with the SSLEP who have identified three priorities;

1. Developing a more enterprising culture both at school and beyond
2. Ensuring that young people and adults are equipped with basic employability skills required by local businesses
3. Ensuring we are delivering the education and skills needed to fill jobs now and in the future

Innovation

It is widely recognised that innovation at the heart of business will improve efficiency and increase production. However, the challenge is how to create the conditions for innovation to increase economic growth and ensure that everyone benefits.

Reflecting the UK Industrial Strategy and Midlands Innovation we will work with our partners to create a more innovative economy building on our world leading sectors based at Keele University Science and Innovation Park and others such as KMF Sheet Metal Fabrication and Precision Engineering and JCB World Logistics.

Working with the SSLEP we will help our businesses to access the resources required to build on existing good practice and introduce new innovative approaches to enable further growth and development of new technologies to drive growth across the borough.

We will work with partners to make the most of the Medical Technology sector, which has seen significant growth in our area. Although it is still quite a small sector when statistically defined, accounting for nearly 500 jobs across Stoke-on-Trent and Staffordshire, Newcastle-under-Lyme has a concentration of employment in this sector that is more than twice that seen nationally, primarily comprising companies involved in the wholesale of pharmaceutical products.

Working with SSLEP we will help to further raise the profile of the growing number of leading medical technology and healthcare companies, including TRB Chemedica, Biocomposites, Cobra Biologics and Intelligent Orthopaedics, which are based at Keele Science and Innovation Park and in the Borough.

In line with the STEM (Science, Technology, Engineering and Maths) Strategy, which aims to deliver growth and success in STEM related industries, we will work with partners in education and skills to encourage growth and success within this area.

Artificial intelligence (AI)

Known as the 4th Industrial revolution, the role of automation and AI will provide a significant boost to the economy but has potentially negative impact on the availability of jobs, particularly middle skills/income positions. By 2030 it is estimated that many knowledge-based professions will be

impacted by the use of AI in the workplace leading to a polarisation of the workforce and a change in workplace practice.

Careful consideration and forward planning is required within the term of this strategy to work with education partners and other stakeholders to develop the future skills required, with many estimates suggesting the main growth area for work will be within the care sector, creative industries and high skill areas (post-graduate

Implementation, Monitoring and Review

An Action Plan will be prepared each January/February and will set out in more detail how the aims and objectives agreed will be carried out. Like the strategy itself, these will also be based around the four themes of

- Business Intelligence and Support
- Place and Infrastructure / Sites and Premises
- Skills
- Innovation

The Action Plans will identify lead bodies and timescales for implementation.

At the end of each year the Council will publish an annual progress report, reviewing the year as well as agreeing the action plan for the following year, giving decision makers in the Council and their partners the opportunity to assess success to date.

The review may also take the opportunity to consider fresh Government initiatives or changes in the economic or financial landscape.

ACTIONS

We will work with our partners to deliver the following:

Business Intelligence and Support

Action	Partner / Lead	Resources	Timescale
Increase both the proportion of knowledge intensive employment and the proportion of high quality jobs in retail, leisure, tourism and distribution	LEP Keele NSCG Council	Review in line with changes to EU funding	2020-22
Support development of emergent knowledge intensive sectors, building on higher and further education expertise	LEP Keele NSCG Council	EU funding	2020-22
Support development of the professional and business services sector	Growth Hub Finest Chamber Council	LEP funding Company membership of relevant organisations Staff time	Ongoing
Make the most of the Borough's successful logistics sector	LEP Make It Council	LEP Staff time	Ongoing
Focus on support and development of local SMEs	Council LEP Chamber	Staff time	Ongoing
Seek to optimise the benefit to local companies from public sector procurement.	Council SCC Anchor institutions	Staff time	2020

Place and Infrastructure

Action	Partner / Lead	Resources	Timescale
Work with Newcastle BID and Go Kidsgrove to promote the town centre's as a places to visit, work and live	BID Go Kidsgrove Council SCC Town Centre Businesses Appetite York Place and other investors	BID membership levy Go Kidsgrove fundraising Staff time	BID until 2020 subject to re-ballot
Work with the developers of the Ryecroft area of town to secure a development that will add to the economic vitality of the town.	HDD Council SCC LEP	Private sector investment Possibly LEP funding Possibly Sustainable Transport funding Staff time	2018-20
Promote Keele Science and Innovation Park for high tech inward investment including new Innovation Centres and a new Training and Conference Hotel	Keele Council SCC LEP Make It	Private sector investment EU funding SCC funding Possible central government funding Staff time	2018 onwards
Work with partners in the Enterprise Zone to attract employment investment to sites and premises around the Borough including land at Chatterley Valley	LEP Council SCC Stoke CC Private Investors	Private sector investment EU funding SCC funding Possible central government funding	2017 onwards

Bring forward proposals for retail and business accommodation in Newcastle Town Centre with priority placed on growing its professional services and a distinctive retail offer	BID Council HDD York Place	Staff time Private sector investment Rural Enterprise Grants Staff time	Ongoing private investment Up to 2020 for grants
Enable the development of a wide range of housing, including affordable and higher quality housing for current and future residents.	Homes and Communities Agency Registered Providers Council Private Developers	Private Developers HCA funding S106 funding to support affordable housing Staff time	Ongoing
Bring forward new sites for employment and housing through the Site Allocations Development Plan Document to enable the further growth of the Borough.	Council SCC Stoke CC	Staff time	2022
Explore options to improve M6 connectivity at Junction 15 in line with the SMART Motorway improvements	Council LEP Highways England Local MP's	Staff time	Ongoing

Skills

Action	Partner / Lead	Resources	Timescale
Continue to work with Newcastle Employment and Skills Group and providers to support people furthest from training and jobs and ensure effective communication between service deliverers	Council Aspire Housing NSCG DWP National Careers SCC / Libraries Providers	Staff time	Ongoing

Work with the SSLEP Education Trust and partners to deliver the Skills Strategy priorities	LEP Council SCC Stoke CC	Staff time EU funding Central Government Funding Private Sector Investment	Ongoing (including review of EU funding)
Work with the SSLEP Locality Project and Stoke on Trent and Newcastle Cultural Education Partnership to encourage a more enterprising culture within our schools	LEP – Education Trust Council Careers and Enterprise Company Cultural education Partnership	Staff time EU funding	Ongoing subject to EU funding
Continue to work with both Keele University, Staffordshire University and Newcastle and Stafford College Group to address skills gaps	LEP Universities NSCG	Staff time	Ongoing subject to EU funding
Raise skills and increase training and employment rates to increase productivity	NESG partners Universities NSCG LEP Providers	Staff time EU funding	Ongoing subject to EU funding
Stimulate demand for higher skills and create opportunities for people to acquire skills for current and future industrial structure	NESG partners Universities NSCG LEP Providers	Staff time EU funding	Ongoing subject to EU funding

Innovation

Action	Partner / Lead	Resources	Timescale
Continue to support further development of Keele University and Science and innovation Park as detailed in The New	Keele LEP SCC	EU funding Private Sector Funding SCC	Ongoing

Keele Deal	Council	Staff time	
We will work for a well-funded, strongly targeted funding structure that is flexible in delivery and managed locally and democratically post Brexit	LEP Universities Council Local businesses	Staff time UK Shared Prosperity Fund	Ongoing
Encourage a greater level of innovation amongst our local businesses including Medtec.	LEP Universities Local Businesses	EU funding Private Sector Funding SCC Staff time	Ongoing
In line with our Local Plan develop employment sites and premises that support creation and investment of innovative businesses	Council Universities Private Developers LEP	Staff time Private Investment	Ongoing
Monitor the growing influence of AI and automation on job trends and skill requirements and work with the education partners to develop courses and structures to enable people to train within the identified growth areas.	Council Universities and wider education sector LEP	Staff time	Ongoing
Consider the support in terms of housing, services and benefit provision to mitigate against the impact of work-force polarization resulting in an increase in unemployment and of low-paid and insecure jobs.	Council LEP	Staff time	Ongoing

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<p>STRENGTHS</p> <ul style="list-style-type: none"> • An experienced officer team • Keele University – top of the league for student employment and satisfaction. • Keele Science and Innovation Park – attractor for new/fresh businesses • Staffordshire University – among the top 10 for teaching quality • Newcastle under Lyme College and Performing Arts Centre; top quartile • Attractive Town Centre - large employment area, great for culture and leisure, strong independents • The Brampton Museum and Art Gallery – 56,000 visitors annually • Newcastle BID – excellent links with businesses, great range of events, street ambassadors, great marketing e news • Low land and labour costs • Green Flags and Purple Flag • Good partnership working with the two universities - providing the area with a sizeable young degree educated workforce • Accessible via links to M6, A50, A34 • Attractive urban and rural housing areas and housing choice • 93 minute rail service to London, 35 mins to Manchester, 45 mins to Birmingham 	<p>WEAKNESSES</p> <ul style="list-style-type: none"> • The slow decline and de-industrialisation of North Staffordshire generally • Low graduate retention • Low business start-up rate • Low skill economy • Out-of-town retail and office development weakening the strength and appeal of our town centres • M6 Junction 15 to 16 not included in the SMART motorway upgrade
<p>OPPORTUNITIES</p> <ul style="list-style-type: none"> • Constellation Partnership ambitions for development • The Ryecroft Development • Castle House – Civic Hub • The Markets contract with Market Place Management • Employment directly and indirectly through the delivery of HS2 • Planned UK Shared Prosperity Fund • Proximity to the 'Northern Powerhouse' at a much cheaper cost than Cheshire • Growth of Keele Science and 	<p>THREATS</p> <ul style="list-style-type: none"> • Brexit, leading to delays and uncertainty in private sector investment decisions • Loss of ERDF/ESF and European funding generally (important regeneration tools / incentives) • That the benefit of investment development across North Staffordshire is not retained in Newcastle • Lack of employment land, preventing Newcastle to 'pitch' for large mobile companies when the opportunity arises • That HS2 might actually worsen

<ul style="list-style-type: none"> • Innovation Park and the opportunities this offers • Cultural regeneration through the celebration of Philip Astley • The global marketing value of a Premier League football club • Partnership with the SSLEP • Student accommodation further developing the student town • Brexit focus on global trade and the opportunities it may bring for Keele Science and Innovation Park 	<p>this area's competitive advantage c.f. South Cheshire, Birmingham and Manchester.</p> <ul style="list-style-type: none"> • Ongoing and significant reductions in public sector employment • Ongoing changes to shopping habits impacting on town centre vacancy rates and retail economy generally • Over provision of student accommodation in the town centre
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Newcastle Borough Profile (Data source NOMIS 2017, unless otherwise stated)

The Borough of Newcastle is based around the historic 800 year old market town of Newcastle-under-Lyme. Kidsgrove, six miles to the north, is the Borough's second town. The Borough is part urban (together with neighbouring Stoke-on-Trent forming the western part of the North Staffordshire conurbation) and part rural. The Borough is also home to the country's largest campus university, Keele University, which currently has 10,000 students. Keele graduates are officially recognised as the most employable graduates in the country.

The town lies along the A34 and is well served by the M6, the A500 and the A50. Lying on the West Coast Main Line, four trains an hour connect Stoke-on-Trent Railway Station, 3 miles from Newcastle Town Centre, to London Euston (1 hr 27 mins) and Manchester (37 mins). Four airports, Manchester, East Midlands, Liverpool and Birmingham lie within 50 to 75 mins drive time.

Population

The Borough's population continues to grow and is currently 128,500; it is likely to reach about 131,000 by the end of this 5-year Strategy.

Households

There are currently 58,283 households in the borough and over the next five years it is planned that this will rise by 1396 to 59,679.

Over the period 2012 - 2017, 1489 new houses were completed, an average annual rate of house building of 297. The Strategic Housing Market Assessment that was commissioned as part of the evidence base for the forthcoming Joint Local Plan indicates a need to plan for about 11,700 additional dwellings up to the year 2033.

Employment status

69,700 people work in the Borough, of which 10,600 are self-employed and 55,300 are employees.

The split between full-time (32,000) and part-time (14,000) employment closely reflects the national and regional pattern (2015 figures)

The level of self-employment (11.8% is higher than the GB average of 10.6% and higher than the West Midlands at 9.4)

Employee Jobs by Industry

Wholesale and Retail Trade accounts for 19.6% (GB: 15.8%), Education 13% (GB: 9.2%), Transport and Storage 10.9% (GB: 4.7%), Manufacturing 8.7% of employment (GB: 8.3%), Admin and Support Service 8.7% (GB 8.9%) Financial and Insurance 1.5% (GB: 3.6%)

Significant private sector employers:

Leoni Wiring, Ibstock Brick, Regina Plastics, Jacuzzi, Keele Science and Innovation Park companies such as Bio Composites, Siemens Wind Power UK, Capita, GVA and Cobra Bio, engineering firms such as, KMF Engineering, Phoenix Dynamics and Simon-Hartley, in the logistics field, New Look, George, TK Maxx, Smyths Toys, Fedex and AAH, and a wide range of professional services firms including Knights, Syntectics Solutions, Hacking Ashton and Aspire Housing. Keele University and Newcastle and Stafford College Group are significant employers in the Higher and Further Education sectors.

Qualifications

The local resident workforce is slightly less qualified than the rest of the country, 36.9% are qualified to degree level (GB 38.2%, West Midlands region 31.5%), 59.9% have two or more A levels (GB 56.9%, West Midlands region 49.7%), though the numbers with no qualifications (10.5%) is higher than GB (8.0%), but less than the West Midlands region (11.8%).

Earnings

Earnings on the other hand fall behind the regional and national average with the median weekly pay for full-time workers in 2016 at £459.6 compared to GB £540.2 and WM £510.2.

Claimants

JSA claimants are currently lower than at any point over the last 10 years and this is considered to be full employment. However, there are still almost 4,000 claimants of Employment Support Allowance who are furthest from training and work.

Business Counts

Total Business Counts at 2016 were 3,495 which is 87.3% compared to West Midlands 88.7.

Town Centre Vacancy Rates

Town centre vacancy rate in Newcastle is currently at 13%.

As an indication of scale, Newcastle under Lyme Town Centre has a commercial floorspace of 105,343 m². This compares with Stoke-on-Trent City Centre (203,077 m²); Stafford Town Centre (110,282 m²); Macclesfield Town Centre (96,680 m²); Stoke Town Centre (75,391 m²); Longton Town Centre 66,965 m²); and Leek (46,580 m²).

NEWCASTLE-UNDER-LYME BOROUGH COUNCIL

REPORT TO CABINET

Date: DECEMBER 2017

Title: Safeguarding Policy Review

Submitted by: Sarah Moore – Partnerships Manager

Portfolios: Community Safety and Wellbeing

Ward(s) affected: All

Purpose of the Report

To reaffirm to Cabinet of the role of the Borough Council in safeguarding children and adults at risk of abuse and neglect.

To seek Cabinet approval for the adoption of the reviewed and updated version of the Safeguarding Policy for the Borough Council in Newcastle-under-Lyme.

Recommendations

To approve the updated Safeguarding Policy and accompanying procedure for delivery in the Borough.

Reasons

The Children Acts (1989) and (2004), the Care Act (2014) and the Safeguarding Vulnerable Groups Act (2006) place statutory duties on District Councils to make arrangements to ensure that in discharging their functions they have regard to the need to safeguard and promote the welfare of children and adults at risk of abuse and neglect.

The statutory guidance '*Working together to safeguard children: a guide to inter agency working to safeguard and promote the welfare of children (2015)*' provides core legislative requirements regarding the expectations of the role of District Councils working alone or in partnership with other organisations.

1. Background

- 1.1 Safeguarding children can be defined as *"The process of protecting children from abuse or neglect, preventing impairment of their health and development, and ensuring they are growing up in circumstances consistent with the provision of safe and effective care that enables children to have optimum life chances and enter adulthood successfully"*.
- 1.2 The safeguarding duties apply to an adult who: has needs for care and support (whether or not the local authority is meeting any of those needs) and; is experiencing, or at risk of, abuse or neglect; and as a result of those care and support needs is unable to protect themselves from either the risk of, or the experience of abuse or neglect. The adult experiencing, or at risk of abuse or neglect will hereafter be referred to as the adult throughout this policy.

- 1.3 The Children Act (2004) requires each local authority to establish a Local Safeguarding Children Board (LSCB) made up of representatives from the agencies and bodies which have regular contact with children or have responsibility for services to them (or their families) in the local area and builds upon the provisions of the Children Act (1989) Act.
- 1.4 As a statutory authority providing services in the community to children and their families the Borough Council is required to co-operate in the establishment, operation, and participation of the LCSB and is a member of the Staffordshire Safeguarding Children's Board (SSCB), which became operational in April 2006. The Borough Council also has a legal responsibility to safeguard, promote wellbeing and protect children when discharging our functions.
- 1.5 The Care Act (2014) introduced a statutory requirement for each local authority to establish a Safeguarding Adults Board (SAB) made up of representatives from the agencies and bodies which have regular contact with adults at risk of abuse and neglect or have responsibility for services to them (or their families) in the local area. The Borough Council is a member of the Staffordshire and Stoke-on-Trent Adult Safeguarding Partnership (SSASP).
- 1.6 The Borough Council participates in the District Safeguarding Sub Group (for Children and Adults at risk of abuse and neglect) and has led the review of the Safeguarding Children and Adults at Risk of Abuse and Neglect Policy template, which is proposed to be used as a template for good practice and adopted by all participating Districts in Staffordshire.
- 1.7 The Policy seeks to help protect all children and adults at risk of abuse and neglect living in our communities and to support the Borough Council, its staff, elected members and volunteers.
- 1.8 In line with the legal responsibilities from Section 11 of the Children Act 2004, the Council participates in regular audits to ensure that in discharging our functions we have regard to the need to safeguard and promote the welfare of children. These audits give the Council an opportunity to highlight areas of strength and to identify areas for further development, of which some have been incorporated into the updated Policy.
- 1.9 The Council needs to ensure that it has robust mechanisms in place in order to appropriately co-ordinate safeguarding activity in the Borough. The following individuals have been identified to champion safeguarding within our organisation;
- Portfolio Holder of Communities and Social Cohesion.
 - Chief Executive and Director of Operations.
 - Head of Human Resources.
 - Designated Safeguarding Officer - Partnerships Manager.
 - Deputy Designated Safeguarding Officer – Partnerships Vulnerability Officer.
- 1.10 The Council has also identified a number of Officers from each service area, to undertake the roles of 'Safeguarding Champions'. These Officers have received specialist training in this area and are the point of contact for queries in relation to safeguarding in their Department. They will assist the Designated Safeguarding Officer and Deputy to ensure that all staff are trained appropriately to recognise safeguarding issues and know where to refer concerns in relation to children and adults at risk of abuse and neglect in our communities.

2. Issues

2.1 The Safeguarding Policy and supporting procedure is based on the following principles;

- The welfare of children and adults at risk is the primary concern.
- All children and adults at risk irrespective of their age, culture, disability, gender, language, racial origin, socio-economic status, religious belief and/ or sexual orientation have the right to protection from abuse and harm.
- It is everyone's responsibility to report any concerns about abuse in order that prompt action be taken if required.
- All incidents of alleged poor practice, misconduct and abuse will be taken seriously and responded to swiftly and appropriately.
- All personal data will be processed in accordance with the requirements of the Data Protection Act 1998.

2.2 In order to effectively deliver the principles in 2.1 (above) the Borough Council needs to be able to demonstrate;

- Senior management commitment
- A clear statement of the Council's responsibilities towards children and adults at risk, available for all staff
- A clear line of accountability within the organisation for work on safeguarding and promoting the welfare of children and adults at risk
- Safe recruitment procedures
- Training on safeguarding for all staff working with or in contact with children and families and adults at risk
- Effective inter agency working
- Effective information sharing

3. Options Considered

3.1 Two options were considered;

- That Cabinet approves the updated Safeguarding Policy for delivery in the Borough (Recommended).
- That Cabinet rejects the approval of the updated Safeguarding Policy – thereby placing both the organisation, its key stakeholders and children and adults at risk in danger of harm (Not recommended)

4. Proposal and Reason for Preferred Solution

4.1 That Cabinet approve the adoption of the updated Safeguarding Policy in the Borough.

4.2 Reasons for the preferred solution include:

- 4.2.1 Officers have been involved in the development of the Policy with Officers from Staffordshire Safeguarding Children's Board (SCCB) and Staffordshire and Stoke-on-Trent Adult Safeguarding Board (SSASB) to ensure that the Policy is suitable for adoption in the Borough.
- 4.2.2 The Council needs to ensure that it has robust mechanisms in place in order to appropriately co-ordinate safeguarding activity in the Borough.
- 4.2.3 The Children Act (1989) and (2004), the Care Act (2014) and the Safeguarding Vulnerable Groups Act (2006) place statutory duties on District Councils to make arrangements to ensure that in discharging their functions they have regard to the need to safeguard and promote the welfare of children and adults at risk of abuse and neglect.

- 4.2.4 The statutory guidance '*Working together to safeguard children: a guide to inter agency working to safeguard and promote the welfare of children (2015)*' provides core legislative requirements regarding the expectations of the role of District Councils working alone or in partnership with other organisations.

5. Outcomes Linked to Corporate Priorities

- 5.1 The Safeguarding Policy contributes to meeting the Council's Corporate Priorities for Creating Healthy and Active Communities and Creating a Cleaner, Safer and Sustainable Borough.

6. Legal and Statutory Implications

- 6.1 The Council has statutory duties under the Children Act (1989) and (2004), the Care Act (2014) and the Safeguarding Vulnerable Groups Act (2006) to make arrangements to ensure that in discharging functions we have regard to the need to safeguard and promote the welfare of children and adults at risk of abuse and neglect.
- 6.2 The statutory guidance '*Working together to safeguard children: a guide to inter agency working to safeguard and promote the welfare of children (2015)*' provides core legislative requirements regarding the expectations of the role of District Councils working alone or in partnership with other organisations.

7. Equality Impact Assessment

- 7.1 An Equality Impact Assessment is being developed for this area of work.

8. Financial and Resource Implications

- 8.1 There are no specific additional financial implications or commitments required for the adoption of the Policy.
- 8.2 There are resource implications (using existing resources) for Council Officers and Members who are involved in and will co-ordinate safeguarding activity, in particular delivering and participating in training on the Policy and accompanying Procedure and making appropriate referrals, signposting and promoting the Policy and safeguarding activity thereafter.

9. Major Risks

- 9.1 Failure to take appropriate action regarding safeguarding may result in the Council being unable to perform its statutory duties, leaving the Council open to legal challenge.
- 9.2 Failure to take appropriate action regarding safeguarding may lead to a child or adult at risk suffering unnecessary harm.
- 9.3 There is also a risk of reputational damage to the Council if it does not deliver its statutory duties lawfully and effectively.

10. Key Decision Information

- 10.1 The Council has statutory duties to safeguard, promote wellbeing and protect children and adults at risk of abuse and neglect.
- 10.2 This report can be considered key in the following ways: -
- It results in the Borough Council committing existing resources for the function to which the decision relates and;
 - To be significant in terms of its affects on communities living or working in an area comprising two or more electoral wards in the Borough.

11. Earlier Cabinet/Committee Resolutions

- 11.1 Safeguarding Children and Vulnerable Adults Protection Policy – October 2015.

12. List of Appendices

- 12.1 Appendix 1 - Safeguarding Policy 2017 (available on request).

13. Background Papers

- 13.1 None

Implications included	Head of Service agreed report, signed & dated	Financial Implications signed & dated	Legal & risk implications signed & dated
Financial			
Legal			
Risk			
Corporate format used			

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Safeguarding Children and Adults at risk of Abuse or Neglect Policy and Procedure

Date Agreed: Executive Management

Cabinet

Staffordshire Safeguarding Children Board (SSCB)

SSASPB

JANUARY 2018



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Section 1

1.1 Introduction

All children ¹and adults at risk of abuse and neglect ² have the right to live their lives to the fullest potential, to be protected, to have the opportunity to participate in and enjoy any activity, and to be treated with dignity and respect.

Newcastle-under-Lyme Borough Council has both a moral and legal obligation to ensure a duty of care for children and adults across its services. The Borough Council is committed to ensuring that all children and adults are protected and kept safe from harm whilst engaged in services organised and provided by the Council. We believe that safeguarding is everybody's responsibility.

The purpose of this Policy and its associated procedures is to help protect all children and adults, including those living in our communities placed in our care within our services and to protect Newcastle-under-Lyme Borough Council, its staff, elected members and volunteers.

1.2 Policy Statement and Scope

The scope of this Policy is to understand the Borough Council's legislative framework, to outline the procedures to be followed and to identify the relevant contacts in relation to safeguarding children and adults at risk. The Policy covers safeguarding children and adults.

Newcastle-under-Lyme Borough Council has a legal responsibility to safeguard, promote wellbeing and protect children and adults.

This will include;

- Respecting and promoting the rights, wishes and feelings of children and adults.
- Raising the awareness of the duty of care responsibilities relating to children and adults throughout the Council.
- Promoting and implementing appropriate procedures to safeguard the well-being of children and adults to protect them from harm.
- Creating a safe and healthy environment within all our services, to protect all parties and reduce the risk of abuse or allegations of abuse from occurring.
- Recruiting, training, supporting and supervising staff, elected members and volunteers to adopt best practice to safeguard and protect children and adults at risk from abuse, and to also minimise any risks to themselves.
- Responding promptly to any suspicions or allegations of misconduct or abuse of children or adults in line with the Staffordshire Safeguarding Children Board (SSCB) inter-agency policies and procedures for safeguarding children and promoting their

¹ 'Children' for the purposes of these guidelines are defined as those aged under 18 years

² The safeguarding duties apply to an adult who: has needs for care and support (whether or not the local authority is meeting any of those needs) and; is experiencing, or at risk of, abuse or neglect; and as a result of those care and support needs is unable to protect themselves from either the risk of, or the experience of abuse or neglect. The adult experiencing, or at risk of abuse or neglect will hereafter be referred to as the *adult* throughout this policy.

welfare and the Staffordshire and Stoke on Trent Adult Safeguarding Partnership Adult Safeguarding procedures

- Requiring staff, elected members and volunteers to adopt and abide by the Council's Safeguarding Policy and Procedures, codes of conduct and associated procedures.
- Reviewing and evaluating this policy and procedure on an annual basis or in line with best practice, changing legislation, organisational requirements and service delivery.
- Ensuring representatives including partnerships with private, voluntary or contracted organisations of Newcastle-under-Lyme Borough Council who have contact with children, young people or adults are subject to safer recruitment procedures.

1.3 Principles

This Policy and supporting procedures are based on the following principles;

- The welfare of children and adults is the primary concern.
- All children and adults irrespective of their age, culture, disability, gender, language, racial origin, socio-economic status, religious belief and/ or sexual orientation have the right to protection from abuse and harm.
- It is everyone's responsibility to act on any concerns about abuse in order that children and adults are appropriately safeguarded.
- All incidents of alleged poor practice, misconduct and abuse will be taken seriously and responded to swiftly and appropriately.
- All personal data will be processed in accordance with the requirements of the Data Protection Act 1998.

1.4 Supporting Documents/Legislation

This Policy should be read in conjunction with a number of additional policies and legislative documents, listed in Appendix B.

The major pieces of legislation and guidance are:

- The Children Act 1989 and 2004
- Care Act 2014
- Guidance to the Care Act 2014
- Safeguarding Vulnerable Groups Act 2006
- Public Interest Disclosure Act 1998
- Data Protection Act 1998
- European Convention of Human Rights
- Working Together to safeguard Children 2015
- Mental Capacity Act 2005
- Disclosure and Barring Service (formerly the Criminal Records Bureau (CRB) and Independent Safeguarding Authority (ISA)
- Staffordshire Safeguarding Children Board's Inter-agency policies and procedures for safeguarding children and promoting their welfare
www.staffsscb.org.uk/Professionals/Procedures/Procedures.aspx
- Staffordshire and Stoke-on-Trent Adult Safeguarding Partnership Inter-Agency Procedures.

Section 2

Procedure Guide

2.1 Introduction

This set of procedures and guidelines sets out how Newcastle-under-Lyme Borough Council will implement the Safeguarding Children and Adults at Risk of Abuse and Neglect Policy. It is to be used by all staff that come into contact with those who fall under the definition of the procedure, or those who are responsible for managing services that affect these individuals or groups.

The procedure guide is intended to be used in conjunction with the policy document, and other supporting individual service procedures. See Appendices for detail.

2.2 Definitions used within the procedure

- The term children or young person is used to refer to anyone under the age of 18 years in accordance with the Children Act 1989.
- All the policies and procedures described within this document refer to adults as well as children.
- Adults at risk for the purposes of this procedure are an adult who: has needs for care and support (whether or not the local authority is meeting any of those needs) and; is experiencing, or at risk of, abuse or neglect; and as a result of those care and support needs is unable to protect themselves from either the risk of, or the experience of abuse or neglect.
- The term staff, elected members and volunteers is used to refer to employees, district councillors, volunteers and anyone working on behalf of, delivering a commissioned service for or representing the Council.

2.3 Recognition of Abuse including neglect and bullying

Important Rule

It is important to remember that many children and adults will exhibit some of these signs and indicators at some time, and the presence of one or more should not be taken as proof that abuse is occurring. There may well be other reasons for changes in behaviour such as a death, or the birth of a new baby in the family, relationship problems between parents/carers, etc. However, you should always report anything that causes you to suspect that abuse may be happening in order for appropriate action to be taken to ensure the welfare and safety of children and adults.

Recognising Abuse

Recognising abuse is not easy, and it is not the responsibility of council staff, elected members or volunteers to decide whether or not abuse has taken place or if there is significant risk. The Council/authority has a responsibility to act if it believes it may be happening.

Abuse and neglect are forms of maltreatment of a child or adult. Somebody may abuse a child or adult by inflicting harm, or by failing to act to prevent harm. Children and adults may be abused in a family or in an institutional or community setting; by those known to them or, more rarely, by a stranger for example via the internet. They may also be abused by an adult or adults, or by another child or children.

Types and Signs of Abuse

It is generally accepted that there are these types of abuse:

Children

Physical abuse, emotional (or psychological) abuse, sexual abuse and neglect.

Please note that the tabled examples and signs detailed below may also be indicators of other medical factors and may not necessarily confirm abuse and neglect. These tables are provided as a guide to help with the assessment process and the work with children, adults and their families.

PHYSICAL ABUSE	
Examples include	Signs include
<ul style="list-style-type: none"> • Shaking • Pinching • Slapping • Force-feeding • Biting • Burning or Scalding. • Causing needless physical discomfort • Inappropriate restraint • Locking someone in a room 	<ul style="list-style-type: none"> • Unexplained bruising, marks or injuries on any part of the body • Frequent visits to the GP or A&E • An injury inconsistent with the explanation offered • Fear of parents or carers being approached for an explanation • Aggressive behaviour or severe temper outbursts • Flinching when approached • Reluctance to get changed or wearing long sleeves in hot weather • Depression • Withdrawn behaviour or other behaviour change • Running away from home/ residential care • Distrust of adults, particularly those with whom a close relationship would normally be expected
EMOTIONAL/PSYCHOLOGICAL ABUSE	
Examples include	Signs include
<ul style="list-style-type: none"> • Intimidation and/or threats • Bullying • Rejection • Shouting • Indifference and the withdrawal of approval • Denial of choice • Deprivation of dignity or privacy 	<ul style="list-style-type: none"> • A failure to thrive or grow • Sudden speech disorders • Developmental delay, either in terms of physical or emotional progress • Behaviour change • Being unable to play or socialise with others • Fear of making mistakes

<ul style="list-style-type: none"> • The denial of human and civil rights • Harassment • Being made to fear for one's well being 	<ul style="list-style-type: none"> • Self harm • Fear of parent or carer being approached regarding their behaviour • Confusion
SEXUAL ABUSE	
Examples include	Signs include
<ul style="list-style-type: none"> • Rape and other sexual offences • For adults, sexual activity including sexual contact and non-sexual contact that the person does not want, to which they have not consented, could not consent, or were pressured into consenting to. • Being encouraged or enticed to touch the abuser • Coercing the victim into watching or participating in pornographic videos, photographs, or internet images • Any sexual relationship that develops where one is in a position of trust, power or authority 	<ul style="list-style-type: none"> • Pain or itching in the genital/anal areas • Bruising or bleeding near genital/anal areas • Sexually transmitted disease • Vaginal discharge or infection • Stomach pains • Discomfort when walking or sitting down • Pregnancy • Sudden or unexplained changes in behaviour, e.g. becoming aggressive or withdrawn • Fear of being left with a specific person or group of people • Nightmares • Leaving home • Sexual knowledge which is beyond their age or development age • Sexual drawings or language • Bedwetting • Saying they have secrets they cannot tell anyone about • Self harm or mutilation, sometimes leading to suicide attempts • Eating problems such as overeating or anorexia
NEGLECT	
Examples include	Signs include
<ul style="list-style-type: none"> • Withholding help or support necessary to carry out daily living tasks • Ignoring medical and physical care needs • Failing to provide access to health, social or educational support • The withholding of medication, nutrition and heating • Keeping someone in isolation. • Failure to intervene in situations that are dangerous to the person Inadequate supervision and guidance – leaving the child to cope alone, abandoning them or leaving them with inappropriate carers and failing to provide appropriate boundaries about behaviours such as under age sex or alcohol. 	<ul style="list-style-type: none"> • Constant hunger, sometimes stealing food from others • Dirty or 'smelly' • Loss of weight, or being constantly underweight • Inappropriate dress for the weather • Complaining of being tired all the time • Not requesting medical assistance and/or failing to attend appointments • Having few friends • Worsening of health conditions • Pressure sores • Mentioning their being left alone or unsupervised • Sore or extreme nappy rash • Skin infections • Lack of response to stimuli or contact

	<ul style="list-style-type: none"> • Poor skin condition(s) • Frozen watchfulness • Anxiety • Distressed • Child moves away from parent under stress • Little or no distress when separated from primary carer • Inappropriate emotional responses • Language delay
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Adults

Physical abuse, emotional (or psychological) abuse, sexual abuse, neglect, financial abuse, discriminatory, organisational, neglect and acts of omission and self-neglect. (See also Domestic abuse and modern slavery in other types of abuse below)

Type of abuse	Description	Type of abuse	Description
Physical	Hitting slapping, shoving, kicking, rough handling or inappropriate restraint.	Neglect/acts of omission	Includes ignoring medical, emotional or physical needs, failure to provide access to support services, withholding necessities such as food and heating.
Sexual	Any type of inappropriate sexual behaviour including rape, indecent exposure, sexual harassment or innuendo, showing of indecent photographs and sexual acts to which the adult has not consented.	Financial	Includes fraud, theft, assuming ownership of money or items, scamming, getting an adult to spend money unwisely.
Self-neglect	May be as a result of an adult's lifestyle choice, and includes behaviour such as hoarding and extreme poor personal hygiene.	Organisational/ Institutional	Poor practice in a nursing/care or hospital setting or even in an adult's own home. This can be one incident or a series of incidents as a result of an organisations poor practice, policy or procedure.
Discriminatory	Is often on the grounds of age, race, gender, gender identity, culture, religion sexual orientation or disability.	Emotional/ Psychological	Includes threats of harm, intimidation, harassment, coercion, cyber bullying, denial of cultural and religious needs.

Other types of abuse

Domestic Violence and Abuse

As of 1st March 2013, the Home Office definition of Domestic **violence and abuse** is:

Any incident or pattern of incidents of controlling³, coercive⁴ or threatening behaviour, violence or abuse between those aged 16 or over who are or have been intimate partners or family members regardless of gender or sexuality. This can encompass but is not limited to the following types of abuse; psychological, physical, sexual, financial and/or emotional

Source: www.homeoffice.gov.uk

In all cases where there is knowledge or suspicion that there exists a **potential** for a child or children to be suffering harm as a result of domestic violence and abuse, then a referral should be made to Children's Social Care via the First Response Team (FRT) who act as the first point of contact for all referrals in relation cases that meet the **threshold for significant harm** – for further information please refer Section 1E threshold framework 'Accessing the right help at the right time'. www.staffsscb.org.uk/Professionals/Procedures/Procedures.aspx

Where it is thought that a victim of domestic violence and abuse meets the definition of an adult at risk of abuse and neglect, then an Adult Safeguarding referral should be made to the Contact Centre on **0345 604 2719**.

Hidden Harm

Children may be suffering from the effects of what is known as 'hidden harm' if they live with parents or carers who are misusing drugs or alcohol. Children in these situations may be acting as young carers or they may be subjected to any of the forms of abuse described above. Separate policies and procedures for children living with parents who misuse substances and those who are deemed as young carers can be found on the SSCB website. www.staffsscb.org.uk/Professionals/Procedures/Procedures.aspx

Child Sexual Exploitation (CSE)

Child sexual exploitation is a form of sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology. (DFE2017)

Children and Young people do not make informed choices to enter or remain in sexual exploitation. Rather, they do so from coercion, enticement, manipulation, fear or desperation.

For further guidance www.staffsscb.org.uk/Professionals/Procedures/Procedures.aspx

³ Controlling behaviour is: a range of acts designed to make a person subordinate and/or dependent by isolating them from sources of support, exploiting their resources and capacities for personal gain, depriving them of the means needed for independence, resistance and escape and regulating their everyday behaviour.

⁴ Coercive behaviour is: an act or a pattern of acts of assault, threats, humiliation and intimidation or other abuse that is used to harm, punish, or frighten their victim.

Forced Marriage

Forced marriage⁵ is a marriage without the full and free consent of both parties. It is a form of domestic violence and an abuse of human rights. In an arranged marriage the family will take the lead in arranging the match but the couples have a choice as to whether to proceed. In forced marriage, one or both spouses do not (or, in the case of some disabled young people and some adults cannot) consent to the marriage and some element of duress is involved. Duress can include physical, psychological, sexual, financial and emotional pressure.

It is important to note that the Mental Capacity Act does **NOT** allow for consent to marry to be given on behalf of a person without capacity to make this decision for themselves.

Female Genital Mutilation

Female genital mutilation (FGM) includes procedures that intentionally alter or cause injury to the female genital organs for non-medical reasons.” (World Health Organisation 2014). It is illegal in the UK.

FGM is known by a number of names including „female genital cutting“, „female circumcision“ or initiation“. The term female circumcision suggests that the practice is similar to male circumcision, but it bears no resemblance to male circumcision, has serious health consequences and no medical benefits. FGM is also linked to domestic abuse, particularly in relation to „honour based violence“.

For further guidance

<http://www.staffsscb.org.uk/Professionals/Procedures/Section-Four/Section-Four-Docs/Section-4M-Female-Genital-Mutilation.pdf>

Modern slavery / Trafficking

Modern slavery encompasses slavery, human trafficking, forced labour and domestic servitude. Traffickers and slave masters use whatever means they have at their disposal to coerce, deceive and force individuals into a life of abuse, servitude and inhumane treatment.

The organised crime of human trafficking into the UK has become an issue of considerable concern to all professionals with responsibility for the care and protection of children and adults. Any form of trafficking humans is an abuse.

Trafficking of persons means the recruitment, transportation, transfer, harbouring or receipt of persons, by means of the threat of, or use of coercion, abduction, fraud, and deception, abuse of power or of a position of vulnerability. It also includes the giving or receiving of payments or benefits to achieve the consent of a person having control over another person, for the purpose of exploitation.

It is important to note that some cases involve UK-born people being trafficked within the UK, e.g. people being trafficked from one town to another. The consent of the victim of trafficking is irrelevant where any of the above methods have been used.

Trafficked people may be used for sexual exploitation, agricultural labour including tending plants in illegal cannabis farms and benefit fraud. Children as well as adults are trafficked.

⁵ Research carried out by the then Department for Children, Schools and Families estimated that the national prevalence of reported cases of forced marriage in England was between 5,000 and 8,000, with the youngest victim being 2 years old and the oldest 76 years..

If you have a concern regarding trafficking of a person you should immediately contact the Designated Safeguarding Officer or make a referral direct to the appropriate team. Practitioners should not do anything which would heighten the risk of harm or abduction to the child or adult.

Race and Racism

People from black and minority groups (and their parents or carers) are potentially likely to have experienced harassment, racial discrimination and institutional racism. Although racism causes significant harm it is not, in itself, a category of abuse (unless the victim meets the definition of an adult at risk of abuse and neglect, in which case an appropriate referral should be made) and dealing with it is considered under other specific policies of the Council and the District Community Safety Partnership.

Hate Crime

The Association of Chief Police Officers (ACPO) and the Crown Prosecution Service (CPS) have a nationally agreed definition of Hate Crime. Hate crimes are taken to mean any crime where the perpetrator's hostility or prejudice against an identifiable group of people is a factor in determining who is victimised. This is a broad and inclusive definition. A victim does not have to be a member of the group. In fact, anyone could be a victim of a hate crime.

The Crown Prosecution Service (CPS) and The Association of Chief Police Officers (ACPO) have agreed 5 monitored strands of hate crime as set out below.

A hate crime is any criminal offence that is motivated by hostility or prejudice based upon the victim's:

- disability
- race
- religion or belief
- sexual orientation
- transgender identity

Hate crime can take many forms including:

- physical attacks such as physical assault, damage to property, offensive graffiti and arson
- threat of attack including offensive letters, abusive or obscene telephone calls, groups hanging around to intimidate, and unfounded, malicious complaints
- verbal abuse, insults or harassment - taunting, offensive leaflets and posters, abusive gestures, dumping of rubbish outside homes or through letterboxes, and bullying at school or in the workplace.

If the victim of a Hate Crime meets the definition of an adult at risk of abuse and neglect, an Adult Protection referral should be made to the Contact Centre on **0345 604 2719**.

Safeguarding People who are vulnerable to being drawn into Violent Extremism and / or Terrorism

The current threat from terrorism in the United Kingdom can involve the exploitation of vulnerable people, including children of all ages, young people and adults to involve them in terrorism or activity in support of terrorism.

Violent Extremism is defined by the Crown Prosecution Service (CPS) as:

"The demonstration of unacceptable behaviour by using any means or medium to express views, which:

- Encourage, justify or glorify terrorist violence in furtherance of particular beliefs;*
- Seek to provoke others to terrorist acts;*
- Encourage other serious criminal activity or seek to provoke others to serious criminal acts;*
- Foster hatred which might lead to inter-community violence in the UK."*

There are a number of offences that can be considered when dealing with violent extremism. They include offences arising through spoken words, creation of tapes and videos of speeches, internet entries, chanting, banners and written notes and publications.

The main offences employed to date have been soliciting murder and inciting racial hatred.

The Stoke-on-Trent and Staffordshire Local Safeguarding Children Boards and the Staffordshire and Stoke-on-Trent Adult Safeguarding Partnership Board recognise the need to protect people against the messages of all violent extremism including that linked to Far Right / Neo Nazi / White Supremacist, Al Qaeda ideologies, Irish Nationalist and Loyalist paramilitary groups, and that linked to Animal Rights movements.

For further guidance <http://www.staffsscb.org.uk/Professionals/Procedures/Section-Six/Section-Six-Docs/Section-6L-Staffordshire-and-Stoke-on-Trent-LSCB-and-SSASPB-Prevent-Channel-Guidance.docx>

2.4 Risks that increase the likelihood of abuse happening

There are certain situations and factors that put people at particular risk of abuse. If one or more of these factors are present, it does not mean that abuse will occur but it will increase the risk:

- Isolation
- Living in the same household as an abuser
- A previous history of abuse
- The existence of financial problems
- A member of the household experiences emotional or social isolation
- Inappropriate physical or emotional environment e.g. lack of privacy and/ or personal space
- Where there has been a change of lifestyle e.g. illness, unemployment or employment.
- Dependence on others for personal and practical care
- Where a person is dependent on other people to administer money or where several people manage their money
- Where the vulnerable person exhibits difficult and challenging behaviour
- The carer has difficulties such as debt, alcohol or mental health problems
- Poor leadership in care services
- Unmonitored provision of care e.g. where reviews or inspections do not take place
- Failure to comply with standard operating policies and procedures.

Increased Risk to Vulnerable Children

There are many issues that may contribute to child abuse, but some factors *increase* the risk to children and make them more vulnerable to abuse. They can be found in the background of parents, in the environmental situation and in attributes of the child themselves.

Parental factors:

- Parent has a mental illness
- Parent is misusing drugs or alcohol
- Parent has already abused a child
- Parent has previously had children removed
- Unwanted pregnancy / terminations
- Parent has a background of abuse when growing up
- Parents have unrealistic expectations of the child and lack parenting knowledge
- Parent is isolated and has little support
- Parent has a learning difficulty/ disability

Environmental factors:

- Overcrowding in the house
- Poverty or lack of opportunity to improve the family's resources
- Domestic abuse is present
- A non biological adult (i.e. unrelated) living in the house
- Family is experiencing multiple stresses

Child factors:

- Baby is sickly, colicky or unwanted
- Child has a physical or learning disability
- Lack of attachment between child and parent
- Child resides in care, particularly residential
- Child is excluded from mainstream school
- Child uses drugs/ alcohol
- Child goes missing
- Child is living in private fostering arrangements

It is possible to limit the situations where the abuse of children and adults at risk may occur, by promoting good practice to all staff and elected members. Please see Appendix F

2.5 Responding to Disclosure, Suspicions and Allegations

Council employees/ elected members/ volunteers may come across cases of suspected abuse either through direct or indirect contact with children and adults, for example, running a holiday activity, or for peripatetic staff visiting homes as part of their day to day work. It is not an employee's/ elected members/ volunteer's responsibility to decide whether or not a child or adult has been abused. Council employees/ elected members/ volunteers, that suspect abuse have a responsibility to act and report their concerns immediately on any such suspicions to ensure any relevant information is passed to the appropriate team. (See Appendix A(i) and (Aii)).

Responding to Disclosure

Abused children and adults at risk are more likely to disclose details of abuse to someone they trust and with whom they feel safe. By listening and taking seriously what the child or adult is saying employees/ elected members/ volunteers are already helping the situation.

The following points are a guide to help employees respond appropriately:

Dos and Don'ts	
Do	Don't
<ul style="list-style-type: none">• React calmly so as not to frighten them. Making safeguarding personal by seeking the views and wishes of the adult at risk in relation to the safeguarding concern.• Take what the person says seriously, recognising the difficulties inherent in interpreting what is being said by a person who has for example a speech impairment and / or differences in language• Avoid asking leading or direct questions other than those seeking to clarify your understanding of what the person has said. They may be subsequently formally interviewed by the Police and/or Children's Social Care (CSC) and they should not have to repeat their account on several occasions. The first person told may become a witness at court if they have asked/gained direct relevant information.• Reassure the child or adult at risk that they are right to tell.• Explain to them that concerns may have to be shared with someone who is in a position to act.• Make a written record of what has been disclosed at the earliest opportunity using the council's initial concerns form (See Appendix C)	<ul style="list-style-type: none">• Dismiss the concern• Panic• Allow your shock or distaste to show• Probe for more information than is offered• Speculate or make assumptions• Make negative comments about the alleged abuser• Make promises or agree to keep secrets• Ask the child, young person, adult at risk of abuse and neglect or any witnesses to sign your written information as this may be significantly detrimental to any subsequent police investigation• Take photographs of any alleged injuries. Any such recording must only be done by an approved medical or other practitioner, following referral.• Examine injuries

Responding to Concerns

It is the responsibility of the individual employee, elected member or volunteer to take action where there are safeguarding concerns regarding an adult or child.

The employee, elected member or volunteer must make a record of the concern using the Initial Concerns Form (Appendix C). All concerns must then be shared with the Designated Safeguarding Officer or Deputy. If these persons are not available then any concerns should be discussed with a Safeguarding Champion who will take responsibility for safeguarding when the Designated Safeguarding Officer is unavailable.

The employee, elected member or volunteer must make a record of the concern, this should include:

- The date and time
- The child or adult's name, address and date of birth
- The nature of the abuse
- A description of any visible injuries
- Observations – e.g. a description of the child or adult's behaviour and physical and emotional state
- What the child or adult said and what was said in reply. Please record this as accurately as possible, using their choice of language
- Any action taken as a result of the concerns being raised e.g. who was spoken to and resulting actions. Include names, addresses and telephone numbers and whether an early help assessment has been started/ completed
- Sign and date what has been recorded
- Store the information in accordance with relevant procedures, e.g. Data Protection
- Report to and inform your line manager and/or the Council's Designated Safeguarding Officer or Deputy.

A copy of the completed initial concerns form should be shared with the Designated Safeguarding Officer or Deputy on completion and submitted to First Response or the Adult Protection Contact Centre as appropriate (see contact information below). If concerns do not meet the threshold for significant harm the initial concerns form should be shared with the Local Support Team.

Concerns relating to a child

Actions to be taken by the employee / elected member / volunteer / designated officers/ safeguarding champions;

- If after reviewing the SSCB Thresholds document⁶ it is evident that the child or young person is at **risk of significant harm**, a call must be made to First Response on 0800 1313126 (between 8.00 am and 5.30 pm and 4.30 pm on a Friday). Outside of 8.00 am and 5.30 pm any child protection concerns should be directed to Staffordshire County Council Emergency Duty Service on 0345 6042886.
- If the line is busy First Response will accept a brief email with your contact details. This can be sent to frist@staffordshire.gov.uk (please note this should not include any confidential details about a child or young person). In the email explain that it is a child protection⁷ concern.
- First Response will ask you for a range of information, all of which is listed on the MARF. They will also ask you what your concerns are and what evidence you have to

⁶ <http://www.staffscb.org.uk/Professionals/Procedures/Section-One/Section-One-Docs/Section-1E-SSCB-Thresholds-for-Intervention-Guidance.pdf>

⁷ Working together 2015 page 92 explains what child protection is: It is part of safeguarding and promoting welfare. This refers to the activity that is undertaken to protect specific children who are suffering, or are likely to suffer, significant harm.

demonstrate that the child or young person is at risk of significant harm, so it's important to have as much information as possible before you make the call but this shouldn't delay it either. Call takers will also want to know if an early help assessment (see Section 2.6 below) has been completed. If you're not sure you can contact your Local Support Team (LST).

- **In an emergency where someone is at risk of immediate harm - dial 999**

Concerns relating to an adult

- If you have concerns about an adult record the information (as listed above) on the initial concerns form and then seek advice from the Adult Protection Contact Centre on **0345 604 2719**.
- **In an emergency where someone is at risk of immediate harm - dial 999**

***Where there is any possibility that a criminal act may have been committed care should be taken not to take any action that may jeopardise any subsequent criminal investigation.**

All reported concerns must be discussed prior to making a referral with the agency's Designated Safeguarding Officer(s). If this person(s) is not available, either because they are on annual leave or off sick then any concerns should be discussed with a nominated deputy who will take responsibility for safeguarding when the designated lead is unavailable such as a Safeguarding Champion. The Designated Officer/ Deputy should also ensure that the employee reporting the incident is reassured that they have access to staff support if needed.

Safeguarding children and consent

It is important for professionals to discuss their concerns with the child (where appropriate) and family because it can help to resolve issues that otherwise would not warrant a referral to First Response. Discussing concerns early on also builds trust and encourages parents to work with professionals; this in turn keeps children safe and prevents issues escalating. However, there may be circumstances where parents refuse to give consent and it is in this instance that, employees, members or volunteers should make a judgement as to whether, without help, the needs of the child would escalate.

Consent is **not** required for referrals that meet the threshold for significant harm (i.e. child protection); however you, as the referring professional, must inform parents or carers that you are making a referral as stated above, unless by alerting them you could be putting that child or others at risk. If you have not spoken to the parent/ carer, First Response will ask you to do so before they proceed with the call.

Adult safeguarding referrals and Consent

It is important that professionals discuss safeguarding concerns with the adult (if appropriate to do so) and gain their consent to make an adult safeguarding referral. However, information can be shared without consent if there is an overriding public or vital interest;

- Risk of harm to the wellbeing and safety of the adult or others
- Other adults or children could be at risk
- It is necessary to prevent crime or a crime may have been committed
- The person lacks capacity to consent

2.6 Early Help - Responding to lower level concerns in relation to children that do not meet the threshold for significant harm

Staff, members and volunteers may come into contact with children and families that need additional support and help. It is important that action is taken early to enable children to have the best outcomes. There are a range of agencies that can provide early help and support to children and families. The overall aim of early help is to support children, young people and families at the earliest possible stage of a problem emerging to prevent them from reaching crisis point and the need for statutory intervention. The Local Support Team can provide early help to children and families, consent should be obtained from parents/carers for a request for support to be made to the Local Support Team. Staff can also seek advice from the Designated Safeguarding Officers in relation to dealing with lower level concerns; further information on Early Help is available at <http://www.staffsscb.org.uk/Professionals/Staffordshire-Early-Help-Strategy/Staffordshire-Early-Help-Strategy.aspx>

Responding to allegations against Staff and Volunteers

Detailed procedures and guidance relating to the management of allegations against people who work with children are contained within the following documents:

- Working Together to Safeguarding Children (2015) Chapter 2
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/419595/Working_Together_to_Safeguard_Children.pdf
- SSCB inter-agency procedures: Section 4HA

It is essential that any concerns for the welfare of a child arising from abuse or harassment by a member of staff or a volunteer should be reported **IMMEDIATELY** to the Designated Safeguarding Officer / or Deputy and the Head of Human Resources.

If the matter does not meet the threshold for significant harm the Head of Human Resources or Designated Safeguarding Officer/ Deputy will contact First Response and speak to the LADO within 24 hours.

The LADO is a statutory role in relation to allegations against children⁸. They provide an 'Initial Discussion' which allows for the giving of advice and guidance relating to the most appropriate way of managing the allegation or concern, and most importantly will help establish what the 'next steps' should be in terms of investigating the matter further.

The LADO will liaise with Police and children's social care safeguarding teams when appropriate, and also discuss with the Designated Safeguarding Lead or Deputy other issues such as – notifying the child's parents/carers; suspending the adult; risks to other children; communication with relevant other organizations/bodies; supporting the adult and possible media interest. The LADO will also monitor the progress of an investigation and assist an employer in the taking of any difficult judgments about a person's suitability to remain in the children's workforce.

If the allegation is in respect of abuse or harassment of an adult, the Council's Designated Safeguarding Officer will make a referral to Contact Centre 0345 604 2719.

⁸ As defined in Working Together (2015)

Support for the Referrer

The Council will fully support and protect all elected members/ employees/volunteers who, in good faith (without malicious intent), make a referral about a colleague who may be abusing a child or adult and report his or her concern about a colleague's practice.

This support may take the form of counselling through the Council's service, moving the person reporting the abuse / potential abuse to another workplace temporarily whilst the incident is investigated. The Council also has a whistle blowing procedure which a referrer can follow if there are reasons why the standard procedures for dealing with allegations make them feel particularly vulnerable, or if they consider their concerns are not being acted upon appropriately. However, all elected members/ employees/ volunteers have a duty to safeguard and promote the welfare of children and adults at risk and in order to investigate concerns robustly it may not be possible to maintain complete anonymity, but the interests of the referrer will be protected when concerns are raised.

Disclosure

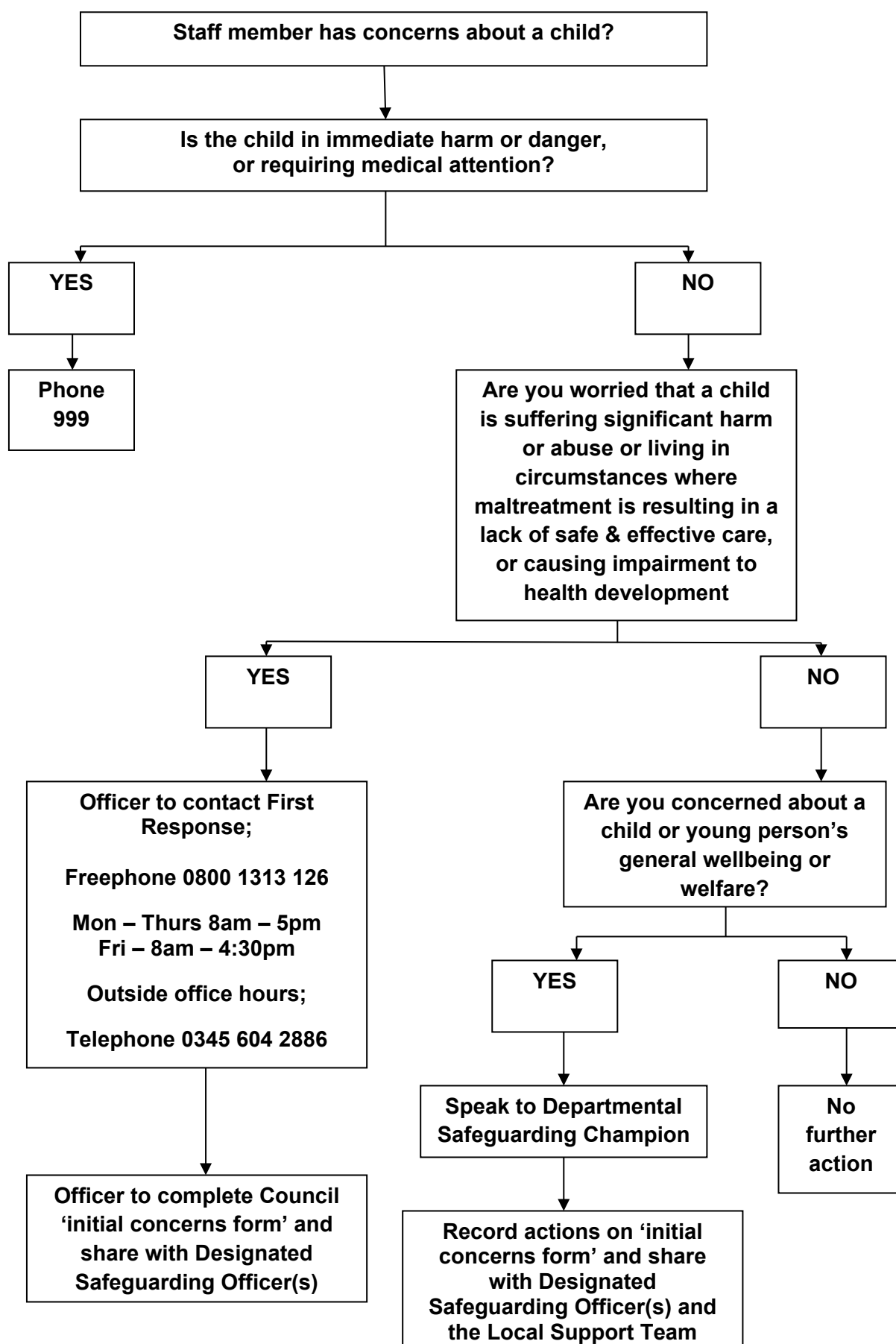
There may be a number of strands to a child or adult safeguarding enquiry e.g. Professional strategy meetings, child protection conferences and core groups, criminal investigations joint evaluation meetings (under Staffordshire LADO procedures) as well as disciplinary investigations. Elected members/ employees/ volunteers may need to be involved as witnesses, holders of key information, or in regard to ongoing processes around protection and welfare.

Further guidance available at:

<http://www.staffsscb.org.uk/>

<http://preview.staffordshirecares.info/StayingSafeintheCommunity/Stopabuseofadults.aspx>

APPENDIX A (i)

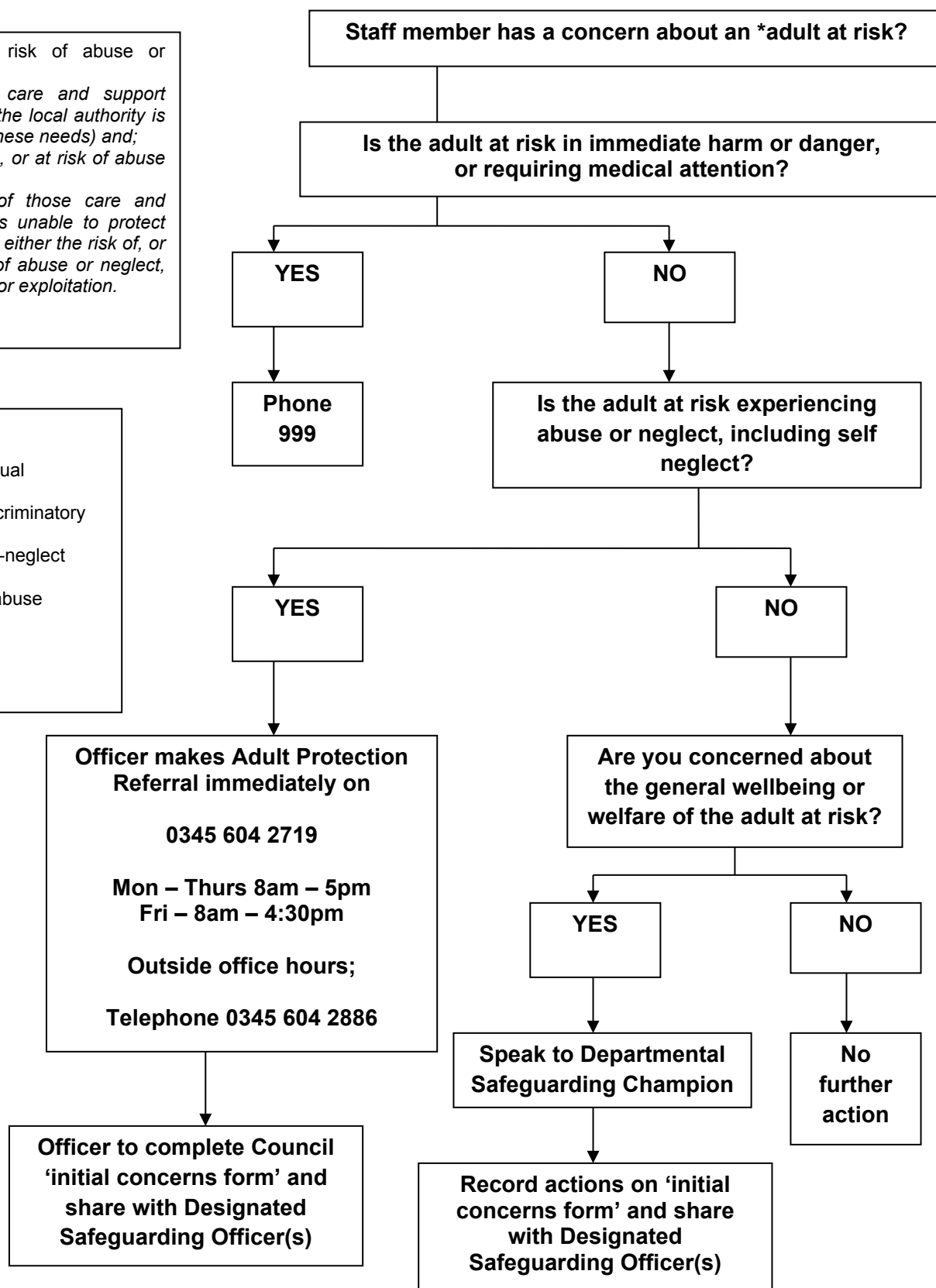


APPENDIX A (ii)

* An adult at risk of abuse or neglect;
has needs for care and support (whether or not the local authority is meeting any of these needs) and;
- is experiencing, or at risk of abuse or neglect; and
- as a result of those care and support needs is unable to protect themselves from either the risk of, or the experience of abuse or neglect, significant harm or exploitation.

Types of abuse:

- Physical - Sexual
- Financial - Discriminatory
- Neglect - Self-neglect
- Organisational abuse
- Domestic abuse
- Modern slavery



APPENDIX B

Guidance and Legislation

Children Act 1989 – provides legislation to ensure that the welfare and developmental needs of children are met, including their need to be protected from harm. The welfare of the child is paramount.

Children Act 2004 – Section 11 places a duty on all organisations to ensure that their functions are discharged with regard to the need to safeguard and promote the welfare of children. The Act offered the legislative framework for the implementation of the five Every Child Matters principles which are considered to be integral to achieving positive outcomes and life chances for all children and young people from birth into adulthood. These principles are:

- Be healthy
- Staying safe
- Enjoying and achieving
- Making a positive contribution
- Achieving economic wellbeing

Working Together to Safeguard Children 2015 - this statutory guidance as revised by the government in 2015 details the roles and responsibilities of all agencies with the aim of promoting effective working together to promote the welfare and safety of children. To view the 2015 Working Together to Safeguard Children statutory guidance please go to; <http://www.workingtogetheronline.co.uk/index.html>

Inter-agency procedures for safeguarding children and promoting their welfare in Staffordshire are available on line at www.staffsscb.org.uk.

The “No Secrets” guidance is available at:

http://www.dh.gov.uk/en/Publicationsandstatistics/Publications/PublicationsPolicyAndGuidance/DH_4008486

Care Standards Act 2000 – this Act details the statutory responsibility for all agencies to ensure the protection of vulnerable adults. In summary this Act –

- establishes a new, independent regulatory body for social care and private and voluntary healthcare services (“care services”) in England to be known as the National Care Standards Commission;
- provides for an arm of the National Assembly for Wales to be the regulatory body for such services in Wales;
- establishes new, independent Councils to register social care workers, set standards in social care work and regulate the education and training of social workers in England and Wales;
- establishes an office of the Children’s Commissioner for Wales;
- reforms the regulation of childminders and day care provision for young children;
- provides for the Secretary of State to maintain a list of individuals who are considered unsuitable to work with vulnerable adults.

Care Act 2014 – builds on recent reviews and reforms, replacing previous legislation to provide a coherent approach to adult social care in England. Part one of the Act (and its statutory guidance) consolidates and modernises the framework of care and support law; it set out new duties for local authorities and partners, and new rights for service users and carers. The Act aims to achieve:

- clearer, fairer care and support;

- wellbeing – physical, mental and emotional – of both the person needing care and their carer;
- prevention and delay of the need for care and support;
- putting people in control of their own care.

Further information can be found at <https://www.gov.uk/government/publications/care-act-2014-statutory-guidance-for-implementation>

Mental Capacity Act 2005 - provides a framework to empower and protect people who may lack capacity to make some decisions for themselves. The Act makes clear who can take decisions in which situations, and how they should go about this. Anyone who works with or cares for an adult who lacks capacity must comply with the MCA when making decisions or acting for that person. This applies whether decisions are life changing events or more every day matters and is relevant to adults of any age, regardless of when they lost capacity.

Interagency Procedures for Adult Protection in Staffordshire can be found at <http://preview.staffordshirecares.info/StayingSafeintheCommunity/Stopabuseofadults.aspx>

There is a wide range of associated legislation and guidance available, see the Office of Public Sector Information for more information (www.opsi.gov.uk)

APPENDIX C

CONFIDENTIAL

Safeguarding Children and Adults at Risk of Abuse and Neglect

Initial Concerns Form

This form should be completed by staff/ members and volunteers to record any concerns regarding the safeguarding of a child or an adult and it should then be shared with your Safeguarding Champion / Line Manager.

It is your responsibility to submit safeguarding concerns to First Response or Adult Safeguarding and to ensure that a copy of the initial concerns form is shared with the Designated Safeguarding Officers in the Partnerships Team – sarah.moore@newcastle-staffs.gov.uk ext 2496 and catherine.fox@newcastle-staffs.gov.uk ext 2238.

ABOUT YOU

Your name	
Job title	
Department	
Contact no	
E-mail address	
Date and time concern raised	

ABOUT THE CHILD / ADULT AT RISK

Name of child / adult at risk that you have concerns about	
Address of child / adult at risk you have concerns about	
Date of Birth of child/adult at risk (if known)	
Name of parent or carer responsible for child /adult at risk (if known)	

NATURE OF YOUR CONCERN

(Please include as much detail as possible)

ACTION YOU HAVE TAKEN

What you have done with the concern? e.g. reported to Police, Daily Hub, Local Support Team, referred to First Response, referred to Adult Protection Team etc.	
Who did you speak to?	
Have you obtained consent from the Adult or child to make the referral?	
Date action taken	
Reference number if applicable	

To be completed by Designated Safeguarding Officer(s)

Name of Designated Safeguarding Officer	
Date and time concern received	
Actions taken	
Has the Multi Agency Referral Form (MARF) been completed?	
Has a referral been made prior the Daily Hub?	
Link to SSCB Procedures; http://www.staffsscb.org.uk/professionals/procedures/	

APPENDIX D

Roles and responsibilities within the Council

Staff, Elected Members and Volunteers

It is everyone's responsibility to report any safeguarding concerns that they may have in order to ensure that prompt action can be taken if required.

Staff, Elected Members and Volunteers;

- should not begin any regulated activity involving direct access to children or adults at risk prior to the Council receiving a satisfactory DBS check in accordance with the DBS Policy.
- should be aware of this policy and procedure and of any local or national related policies / procedures that are applicable for their service area, as part of their induction programme.
- need to complete Level 1 Safeguarding training and additional safeguarding children and adults at risk training if applicable to their employment role and responsibilities (i.e. if they have direct or some form of indirect contact with children and adults at risk).
- should be aware of appropriate and inappropriate behaviour when working with children and adults at risk.
- need to know who their Designated Safeguarding Officer, Deputy Designated Safeguarding Officer and Safeguarding Champion is.
- have an expected responsibility to take action when they have concerns, witness or hold information that relates to the abuse of a children and adults at risk.
- complete an initial concerns form to record any concerns that they may have about a child or adult at risk and make appropriate referrals (if required).
- seek advice or assistance from their Safeguarding Champion if they are unsure of what to do with their concerns about a child or adult at risk.

Safeguarding Champions

Each Directorate has a number of Safeguarding Champions (see **Appendix E** for contact details).

Safeguarding Champions should;

- provide advice and guidance to members of staff or volunteers who may have concerns about the abuse of a child or an adult at risk.
- ensure that concerns are recorded appropriately on the system and appropriate referrals made if appropriate to the First Response Team or Adult Protection Team.
- participate in training and disseminate information within their department.

Designated Safeguarding Officer and Deputy Designated Safeguarding Officer

The Council's Designated Safeguarding Officer is Sarah Moore (Partnerships Manager) and the Deputy Designated Safeguarding Officer is Catherine Fox (Partnerships Vulnerability Officer).

It is their responsibility to:

- provide advice and assistance to the Safeguarding Champions and Elected Members.
- receive information from staff, elected members and volunteers who have concerns, and register /log them on the Council's system.
- be the delegated liaison on behalf of the Council for any formal investigations into allegations of abuse undertaken by the Police and / or Staffordshire County Council's Children's Social Care Service (CSC).

- receive, participate and co-ordinate the appropriate safeguarding children and adults at risk protection training.

If the absence of the Designated Safeguarding Officer or Deputy Designated Safeguarding Officer, queries can also be raised with Safeguarding Champions or directly with Staffordshire County Council's First Response Team or the Adult Protection Team (see **Appendix E** for contact details).

Head of Human Resources

The Head of Human Resources is responsible for ensuring that:

- appropriate procedures are in place to carry out pre-employment checks for all employees and volunteers working with the Council who have (or may be reasonably expected to have) contact with children or adults at risk.
- DBS checks are renewed every three years in accordance with DBS policy.
- DBS checks and employee references are kept secure and confidential in compliance with the DBS Code of Practice.
- a record is maintained all employees and volunteers that have completed a DBS check and are considered to be suitable for working with children and adults at risk.
- training is in place for all staff who fall into the definition of level 1 (basic) or level 2 (specialist / intermediate) and any additional specialist training as part of the corporate training plans for induction and on-going training, and that adequate budget is in place to fund training for those staff who require it as a part of their role.
- appropriate support is provided for any employee that reports a concern in good faith, even if these concerns are subsequently proven to be unfounded.

Chief Executive

The Chief Executive is responsible for:

- ensuring policy documents and procedures are up to date and in line with best practice as defined under the "No secrets" guidance and other legislative or statutory guidance.
- ensuring that employees (including volunteers, contractors, agents and other partner representatives) and elected members are aware of this Policy and understand how to comply with this procedure.
- working with responsible bodies to implement and promote a partnership approach to working together to protect children and adults at risk in all areas of the community.

- **Newcastle Borough Council Safeguarding Champions are;**
 - Jane Finnemore – Environmental Officer – 01782 742588 – jane.finnemore@newcastle-staffs.gov.uk
 - Michelle Hopper – Environmental Officer – 01782 742597 – michelle.hopper@newcastle-staffs.gov.uk
 - Claire Ryles – Technical Assistant – 01782 742524 – Claire.ryles@newcastle-staffs.gov.uk
 - Gillian Taylor – Housing Team Leader – 01782 742563 – Gillian.taylor@newcastle-staffs.gov.uk
 - Joanne Halliday – Head of Assets, Housing and Regeneration – 01782 742451 – joanne.halliday@newcastle-staffs.gov.uk
 - Darren Walters – Environmental Health Team Manager – 01782 742587 – darren.walters@newcastle-staffs.gov.uk
 - Andrea Roe – Accountancy Assistant – 01782 742107 – andrea.roe@newcastle-staffs.gov.uk
 - Rosie Bloor – Customer and ICT Business Manager – 01782 742483 – rosie.bloor@newcastle-staffs.gov.uk
 - Nicola Durose – Senior Human Resources Officer – 01782 742156 – nicola.durose@newcastle-staffs.gov.uk
 - Giovanna Facciponti-Moore – Human Resources Officer – 01782 742263 – giovanna.facciponti-moore@newcastle-staffs.gov.uk
 - Jeremy Regan – Tech Support and Customer Services Manager – 01782 742199 – jeremy.regan@newcastle-staffs.gov.uk
 - Andy Arnott – Sport & Active Lifestyles Manager – 01782 742624 – andrew.arnott@newcastle-staffs.gov.uk
 - Lucy Taylor – Sports Development Manager – 01782 742615 – lucy.taylor@newcastle-staffs.gov.uk
- **Designated Safeguarding Officer** is Sarah Moore (Partnerships Manager) – 01782 742496 – sarah.moore@newcastle-staffs.gov.uk
- **Deputy Designated Safeguarding Officer** is Catherine Fox (Community Safety Officer – DV Lead) – 01782 742238 – catherine.fox@newcastle-staffs.gov.uk
- **Head of Human Resources** is Sarah Taylor – 01782 742261 – sarah.taylor@newcastle-staffs.gov.uk

Contact information for making a referral regarding a safeguarding concern:

- For all child protection issues contact Staffordshire County Council's First Response Team based at the MASH on **0800 1313 126 (between 8am and 5pm Monday to Thursday and 8am and 4.30 pm on a Friday)** or via a brief e-mail firsttr@staffordshire.gov.uk with your contact details (**please note this should not include any confidential details about a child or young person**) and explain the need for an urgent response due to a child protection concern. If concerns do not meet the threshold for significant harm the initial concerns form should be shared with the Local Support Team (LST), contact details are available from the Designated Safeguarding Officers.

For concerns about a childcare provider, advice should be sought from OFSTED on **0300 123 4666 (between 8am - 6pm on Monday to Friday)** or enquiries@ofsted.gov.uk

- To make an Adult Protection referral advice should be sought from the Adult Protection Contact Centre **0345 604 2719 (between 8am and 5pm Monday to Thursday and 8am and 4.30 pm on a Friday)**.
- **Outside of office hours** any concerns relating to a child or adult at risk of abuse and neglect should be directed to Staffordshire County Council **Emergency Duty Service on 0345 6042886**.
- Alternatively contact Staffordshire Police Central Referral Unit on **101** or dial **999 in an emergency**.

APPENDIX F

Promoting Good Practice with Children and Adults at Risk

Code of conduct for the protection of children and adults at risk

It is possible to limit the situations where the abuse of children and adults at risk may occur, by promoting good practice to all staff, elected members and volunteers.

This code of conduct details the type of practice required by all employees, elected members and volunteers when in contact with children or adults at risk. Suspicions or allegations of non-compliance of the Code by a member of staff will be dealt with through the Council's Disciplinary Procedure.

Newcastle-under-Lyme Borough Council supports and requires the following good practice by employees, members and volunteers when in contact with children and adults at risk.

When working with children and adults at risk all parties should:

- Adhere to the Council's Safeguarding Children and Adults at Risk of Abuse and Neglect Policy at all times;
- Treat all children and adults at risk equally, with respect and dignity;
- Be an excellent role model including not smoking or drinking alcohol in the company of children and adults at risk;
- Ensure that personal care is delivered in a dignified manner that meets the needs of the individual;
- Involve parents, guardians and carers wherever possible;
- Build balanced relationships on mutual trust that empower children and adults at risk to share in the decision making process.

Employees shall work to the organisation's policies and procedures, including for example:

- Safeguarding Children and Adults at Risk of Abuse and Neglect Policy
- Code of Conduct
- Whistle blowing
- Safer Recruitment
- Bullying and Harassment.

Social networking sites

Due to the increasing personal use of social networking sites, staff, members and volunteers within the workforce should be aware of the impact of their personal use upon their professional position. Guidance on the personal use of social networking sites for adults involved in services for children and adults at risk is available at:

http://www.staffsscb.org.uk/Search.aspx?search_keywords=social+networking

First aid and treatment of injuries

If a child or adult at risk requires first aid or any form of medical attention whilst in the care of an employee, then the following good practice should be followed:

- Be aware of any pre-existing medical conditions, medicines being taken by participants or existing injuries and treatment required;
- Keep a written record of any injury that occurs, along with the details of any treatment given;
- Where possible, ensure access to medical advice and / or assistance is available;
- Only those with a current, recognised First Aid qualification should respond to any injuries;
- Where possible any course of action should be discussed with the child/adult at risk, in language that they understand, and their permission sought before any action is taken;
- In more serious cases, assistance must be obtained from a medically qualified professional as soon as possible;
- The child's or adult at risk's parents/guardians or carers must be informed of any injury and any action taken as soon as possible, unless it is in the child's or adult at risk's interests and on professional advice not to do so;
- A notification of accident form must be completed and signed and passed to the Health and Safety Officer;
- Familiarise yourself with the bruising in non-mobile babies policy and procedure. This can be found on the SSCB website <http://www.staffsscb.org.uk/Professionals/Procedures/Section-Three/Section-3-Managing-Individual-Cases.aspx>

Transporting children and adults at risk away from home

If it is necessary to provide transport to take children or adults at risk away from home or school the following good practice must be followed:

- Where practical request written parental/guardian consent if members of staff are required to transport children or adults at risk;
- Always tell another member of staff that a child or adult at risk is being transported, giving details of the route and the anticipated length of the journey;
- Never transport a child or adult at risk unaccompanied, other than in exceptional circumstances. Plan pick ups and drop offs to minimise the risk of being alone with a child or adult at risk;
- Ensure all vehicles are correctly insured and well maintained;
- Ensure drivers hold current, appropriate driving licenses, and have undergone training as appropriate (e.g. minibus driving, use of wheelchair hoist);
- All reasonable safety measures must be taken, e.g. children in the back seat behind the driver, seatbelts worn and booster seats in place;
- Ensure where possible at least one male and one female accompany mixed groups of children or adults at risk. These adults should be familiar with and agree to abide by the Council's Safeguarding Children and Adults at Risk of Abuse and Neglect Policy;
- Always plan and prepare a detailed programme of activities and ensure copies are available for other staff and parents/guardians.

Use of Contractors

Contractors must comply with the principles set out in:

- The Safeguarding Vulnerable Groups Act 2006 as amended by the Protection of Freedoms Act 2012;
- The Department for Education 'Keeping Children safe in education (2015)';

- Disclosure and Barring Service (DBS) Checks: Policy and Guidance for service providers and CQC staff (July 2011).

The operation of effective safeguarding practice relies on having safer selection and recruitment policies in place, which are implemented on each occasion a person is employed or volunteers to work with children or adults at risk of abuse and neglect.

Newcastle-under-Lyme Borough Council and its employees, elected members and volunteers should undertake reasonable care that contractors doing work on behalf of the Council are monitored appropriately. Service level Agreements or contracts in place for these contractors should therefore specify this requirement.

Any contractor or sub-contractor engaged by the Council in areas where workers are likely to come into contact with children or adults at risk¹ and take part in 'regulated activity'² (as defined within the new definition with effect from September 2012) must have an appropriate DBS check in place. Additionally they must have their own equivalent Safeguarding Policy, or failing this, must confirm in writing to the relevant departmental manager that they have read and understood and are willing to comply with the terms of this Policy and associated procedures.

There are five types of check that are available. Further guidance is provided on the DBS website (www.gov.uk/disclosure-barring-service) to enable employers to establish, which, if any, level of check is required. The checks that are available are:

1. **Enhanced Check for Regulated Activity (Children)** - used when someone is undertaking regulated activity relating to children. This check involves a check of the police national computer, police information and the children's barred list.
2. **Enhanced Check for Regulated Activity (Adults)** - used when someone is undertaking regulated activity relating to adults. This check involves a check of the police national computer, police information and the adults barred list.
3. **Enhanced Check for Regulated Activity (Children and Adults)** - used when someone is undertaking regulated activity relating to both children and adults. This check involves a check of the police national computer, police information and the children's and adults barred list.
4. **Enhanced DBS Check** - used where someone meets the pre September 2012 definition of regulated activity. This level of check involves a check of the police national computer and police information.
5. **Standard DBS Check** - used primarily for people entering certain professions such as: members of the legal and accountancy professions. Standard DBS checks just involve a check of the police national computer and do not include a check of police information or the children's or adults barred lists.

Where there is potential for contact with children or adults at risk it is the responsibility of the manager who is using the services of the contractor (the Client) to check that the correct Disclosure and Barring Service (DBS) check has been satisfactorily completed.

1 The DBS definition of regulated activity relating to **adults** no longer labels adults as 'vulnerable'. Instead the definition identifies the **activities** which, if any requires them, lead to that adult being considered vulnerable at that particular time. This means that the focus is on the activities required by the adult and not on the setting in which the activity is received, nor on the personal characteristics or circumstances of the adult receiving the activities. There is no longer a requirement for a person to do the activities a certain number of times before they are engaging in regulated activity. Further guidance is on the DBS website: www.gov.uk/disclosure-barring-service

2 The full definition of regulated activity is set out in Schedule 4 of the Safeguarding Vulnerable Groups Act 2006, as amended (in particular, by the Protection of Freedoms Act 2012). Further information can be found at: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/143666/eligibility-guidance.pdf

Guidelines on Children and Adults at Risk in Publications and on the Internet

Websites and publications provide excellent opportunities to publicise achievements of individuals and provide a showcase for the activities of children and adults at risk. In some cases, however, displaying certain information about children and adults at risk could place them at risk.

The following procedure must be followed to ensure the Council's publications and information on the internet does not place children or adults at risk.

- Publications or information on an internet site must never include personal information that could identify the child or adult at risk. Any contact information must be directed to the Council or another relevant organisation.
- Before publishing any information about a child or adult at risk, written consent must be obtained from the child or adult at risk's parent / guardian. If the material is changed from the time of consent, the parents/guardians must be informed and consent provided for the changes.
- The content of photographs or videos must not depict a child or adult at risk in provocative pose or in a state of partial undress. Children and adults at risk must never be portrayed in a demeaning or tasteless manner.
- For photographs or videos of groups or teams of children or adults at risk ensure that only the group or team is referred to not individual members. Credit for achievements by an individual child or adult at risk are to be restricted to first names only.
- All published events involving children or adults at risk must be reviewed to ensure the information will not put children or adults at risk. Any publications of specific meetings or child/adult at risk events e.g. team coaching sessions, must not be distributed to any individuals other than to those directly concerned.
- Particular care must be taken when publishing photographs, film or videos of children or adults at risk who are considered particularly vulnerable e.g. the subject of a child or adult at risk protection issue or a custody dispute.

Important Note: Any concerns or enquiries about publications or internet information should be reported to the Council's Communications Team.

Guidelines on Use of Photography, Videoing and Filming of Children and Adults at Risk – (Including Mobile Phone Technology)

There is evidence that some individuals have used public events as an opportunity to take inappropriate photographs or film footage of children. The following best practice is to be adopted to protect children and adults at risk who are being photographed or videoed.

- When commissioning professional photographers or inviting the press to cover Council services, events and activities organisers must ensure that they make expectations clear in relation to child and adult at risk protection.
- Organisers must check the credentials of any photographers and organisations used.
- Where possible the consent of the parent/guardian/carer for photographing, videoing and / or filming of a child or adult at risk must be obtained prior to the event or activity.
- Where possible anyone wishing to use photographic/film/video equipment at a venue must obtain the approval of the Council.
- An activity or event specific identification badge/sticker must be provided and clearly displayed at all times by the accredited photographers, film and video operators on the day of the activity or event.

- Unsupervised access must not be allowed to children or adults at risk or one to one photographic sessions.
- Do not allow photographic sessions outside of the activities or services, or at a child or adult at risk's home.
- It is recommended that the names of children or adults at risk should not be used in photographs or video footage, unless with the express permission of the child or adult at risk's parent, guardian or carer.
- The Council reserves the right at all times to prohibit the use of photography, film or video at any event or activity with which it is associated.
- The specific details concerning photographic/video and filming equipment should, where possible, be published prominently in event programmes and must be announced over the public address system prior to the start of an event. The recommended wording is;

“In line with the recommendation in the Council's Safeguarding Children and Adults at Risk of Abuse and Neglect Policy, the promoters of the event request that any person wishing to engage in any video, zoom or close range photography should register their details with staff at the spectator's entry desk before carrying out any such photography. The promoter reserves the right to decline entry to any person unable to meet or abide by the promoter's conditions.”

Any concerns with photographers or video or film operators are to be reported to the Council's Designated Safeguarding Officer or Deputy Designated Safeguarding Officer and where relevant, the Police.

Parents/Carers use of Photographic and Filming Equipment at Events

It is good practice to inform parents/carers of the Council's expectations of them using their own photographic/filming equipment at events organised by the Council.

- Parents/carers and spectators should register with the organiser their intent to use zoom, close range photography or filming equipment at an event.
- Children, adults at risk and parents/carers should be informed that if they have concerns they can report these to the organiser.
- Concerns regarding inappropriate or intrusive photography or filming should be reported to the organiser, or senior member of staff present. It is their responsibility to record the incident on the initial reporting a concern form and pass on to the Designated Safeguarding Officer or Deputy Designated Safeguarding Officer to take appropriate action.

An example of wording to be displayed at an event or on publicity material prior to the event should follow the lines of:

“In line with the Council's Safeguarding Children and Adults at Risk of Abuse and Neglect Policy, any person wishing to engage in zoom, close range photography or filming, should register their intent with the event/activity organiser, prior to carrying out any such photography or filming. The organiser reserves the right to refuse any such photography or filming if there are concerns or complaints about its appropriateness”

APPENDIX G

Best Practice in the recruitment of staff and volunteers

Pre-recruitment

If any form of advertising is used to recruit staff and volunteers, it should reflect:

- The responsibilities of the role.
- The level of experience or qualifications required (e.g. experience of working with children is an advantage)
- The Council's open and positive stance on children and adult at risk protection.
- The use of the Disclosure and Barring Service procedures to promote safe recruitment and selection processes.

Applicant Information

All applicants, whether for paid or voluntary, full or part-time positions, should complete an application form which should elicit the following information:

- Name, address and National Insurance Number.
- Past career, relevant interests, any gaps in employment and reasons for leaving.
- Relevant experience, educational qualifications, job specific qualifications and training.
- Any criminal record, convictions or cautions.
- The names of at least two people (not relatives) willing to provide written references that comment on the applicant's previous experience of, and suitability for, working with children or adults at risk where it is a requirement of the job or volunteering role,
- And a willingness to assist in the completion of a DBS check.

Checks and References

Staff and volunteers recruited to work in services for children and adults at risk must be checked for any possible irregularities (or issues), which may give reason for concern.

A minimum of two references should be taken up, one of which must be the previous employer and if available, at least one should be associated with former work with children or adults at risk. References should include the applicant's suitability to work with children or adults at risk where it is a requirement of the job. Where references are given verbally, they must follow a prescribed format and a written record kept.

In accordance with guidance from the Disclosure and Barring Service (DBS) all posts that have direct contact with children and vulnerable adults will require an Enhanced DBS check. These checks will be completed by the Human Resources Team.

Interview

Interviews are carried out in line with the Council's Recruitment and Selection procedures. The interview is likely to include questions on how to deal with children and adult at risk protection issues. Questions will assess competencies around:

- Forming appropriate relationships
- Acting in an appropriate way to protect the safety of individuals

- Behavioural cues and signs

Induction and Training

Checks are only part of the process to protect children and adults at risk from possible abuse. Appropriate training will enable individuals to recognise their responsibilities with regard to their own good practice and the reporting of suspected poor practice/concern of possible abuse. It is important that the recruitment and selection process is followed by relevant inductions and training in order to further protect children and adults at risk from possible abuse.

The induction and training should include:

- An assessment of the training needs required to be carried out by the local manager.
- Clarification, agreement and signing up to the Council's Code of Conduct for Employees.
- Clarification, agreement and signing up to the Council's Safeguarding Children and Adults at Risk of Abuse and Neglect Policy.
- Clarification of the expectations, roles and responsibilities of the job or volunteering role.

As a minimum the Council expects all staff to have participated in formal children and adults at risk safeguarding training within 3 months of commencement of employment with the Council. Refresher training will be required every 3 years. It is the responsibility of line managers in services where children and/or adults at risk are clients/customers to liaise with the Designated Safeguarding Officer(s) to identify additional appropriate training that may be required.

Probation, Monitoring and Appraisal

All newly appointed members of staff undergo an agreed period of probation on commencement of their role.

All members of staff who have contact with children and adults at risk will be monitored and their performance appraised. This will give an opportunity to evaluate progress, set new goals, identify training needs and address any issues of poor practice. Line managers should be sensitive to any concerns about poor practice and act on them at an early stage. They should also offer appropriate support to those who report concerns/complaints.

Particular care must be taken to monitor casual and agency staff, whose less frequent employment reduces the opportunities for regular supervision and training and who may therefore be less familiar with policies and procedures.

It is the responsibility of line managers to monitor good practice. This can be done in a number of ways:

- Direct observation of the activity or service.
- Staff appraisals, mentoring and providing feedback on performance.
- Children's and adults' feedback on the activities or services.

Rehabilitation of Offenders

Newcastle-under-Lyme Borough Council is committed to the fair treatment of its employees (both paid and voluntary), potential staff or users of its service, regardless of race, gender, religion, sexual orientation, responsibilities for dependants, age, physical/mental disability or offending background.

Having a criminal record will not necessarily bar someone from working or volunteering with the Council. This will depend on the nature of the position, the nature of the offence, how long ago and at what age the offence was committed and any factors which may be relevant.

Failure to declare a conviction, caution or pending police action, will disqualify the applicant from appointment or result in summary dismissal if the discrepancy comes to light.

APPENDIX H

A Safer place for children – Guidance for promoting the Safety of Children in Public settings

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1. INTRODUCTION

Public settings such as sports centres and community facilities can be dynamic and exciting places for children, providing relevant and accessible services. To enable these services to flourish it is essential that they are a safe place for the children who use them. Children should feel safe and secure and know that they will receive suitable help if required.

These guidelines have been produced to support organisations responsible for such settings to create an appropriately safe environment. They have been written specifically for managers of public settings, committee members and directors of voluntary organisations who require a framework to assist them in the development of policies and procedures to promote the safety of children.

Guidance promoting the safety of children is one of the foundations of a well-managed service. Rather than reacting to particular difficulties or threats, we should seek to proactively create an environment in which children feel comfortable and safe where their self-confidence can grow.

As agencies working with children, it is important that we are seen to create safe public settings within the community which take the issue of children's safety seriously.

It is important that such settings make information available to parents to ensure the safety of their children when using such facilities. This should include details of who to contact if they have concerns such as:

- Child abuse and neglect
- Bullying
- Forced marriage
- Sexual exploitation
- E-safety

These guidelines must be read and used in conjunction with the policies and procedures of the Staffordshire Safeguarding Children Board which can be found at <http://www.staffsscb.org.uk> and the Borough Council's Safeguarding Children and Adults at Risk of Abuse and Neglect Policy 2015 which can be found at <https://www.newcastle-staffs.gov.uk/all-services/community/partnerships/safeguarding>

2. LEGAL BACKGROUND

The ultimate responsibility for children using public settings rests with their parents or carers. This should be made clear to all parents and carers whose children use such settings. Unless staff are leading a specific activity which parents have agreed that their child can attend, they are not generally in loco parentis ie taking the responsibility of a parent.

Staff leading specific activities in public settings should take such care of children as a reasonable parent would take. This is both a personal responsibility of the staff member and that of the employer.

For staff not directly involved in leading such activities, their employers owe a duty of care to children under the Occupier's Liability Act 1957. This duty is to take such care as is reasonable to ensure that visitors will be safe in using the setting for the purpose for which they are permitted to be there. The standard of care expected in relation to children is higher than in relation to adults because staff must expect children to be less careful than adults. In the event that there is anything on the premises which is both an allurements and danger to children, the 1957 Act requires that reasonable care must be taken to protect them from that danger.

Whether or not staff take direct responsibility for children in the course of their duties, they should be guided at all times by the fundamental principle of the Children Act 1989 that **the welfare of the child is paramount**.

Staff should be aware of their organisations policies concerning child protection and health & safety and should ensure they comply with those policies at all times.

Any hirers, organisations or individuals using the premises to put on an activity for children should be required to use the same standards and duty of care as the organisation ultimately responsible.

3. UNSUPERVISED CHILDREN (under the age of 8) IN PUBLIC BUILDINGS

Children are the legal responsibility of their parents and carers and the view of Staffordshire Safeguarding Children Board (SSCB) is that all children under the age of 8 should be accompanied by an appropriate adult whilst they are in a public setting unless they are part of organised and supervised activities.

Clearly the Council would not wish to discourage any child children from visiting public settings but it is important that the responsible organisation takes reasonable steps to ensure the safety of children and to inform parents and carers of their responsibilities.

The way in which staff deal with unaccompanied children discovered in the building must be based both on an awareness of the responsibility of the parent or carer, and their duty of care to all children on the premises.

If a member of staff believes that a child may be under the age of 8, the following steps should be followed:

- If possible, staff should try to ensure colleagues are present when dealing with an unsupervised child.

- Staff should try to avoid being left alone with the child.
- Staff should attempt to establish whether the child is allowed by the parent or carer to come and go alone. If satisfied that this is so, staff should allow the child to leave. If staff gather this information only from the child they will need to use their judgement to ascertain whether the child is competent to leave alone.

Relevant factors to consider are:

- Whether the child exhibits signs of nervousness.
- Whether the child appears to clearly understand the questions they are asked.
- Whether the child seems physically capable.
- Whether the child appears to know clearly and readily where he or she lives.
- How far the journey is.
- Whether there are any known hazards on the journey.

If in doubt, staff should encourage the child to remain in the building until they have been able to contact a parent or carer. Children under 8 should not normally be allowed to leave alone unless it is known that in the particular case the parent/carer allows it.

Recommended actions for staff:

- Ask the child if they are expecting to be collected by an adult. Even if the child is expecting to be collected soon, do not wait before taking the next step.
- If the child is able to give an address or telephone number; try to contact the parent or carer. If the setting holds registration details, check to see if the child, parent or carer is a registered user of the facilities.
- If it is not possible to contact the parent or carer, see if the child can give contact details of a relative or close family friend.
- Never release a child into the care of another adult unless it is known that they are the parent or carer or the parent/carer has given permission.
- If all attempts fail, please contact the relevant children's social care team (or emergency duty team if outside office hours) or the police.
- Under no circumstances should a child ever be escorted home by a member of staff.
- Under no circumstances should a member of staff try to physically restrain a child from leaving the premises.
- The incident should be reported to the relevant senior manager at the earliest opportunity.

Where concerns relate to a child or young person a referral must be made to Staffordshire Children's Social Care's First Response Team based at the MASH on 0800 1313126 (between 8am and 5pm Monday to Thursday and 8am to 4.30 pm on a Friday) or via a brief e-mail frist@staffordshire.gov.uk with your contact details (please note this should not include any confidential details about a child or young person) and explain the need for an urgent response due to a child protection concern.

To make an Adult Protection referral advice should be sought from the Adult Protection Contact Centre 0345 604 2719.

Outside of 8am and 5pm any concerns relating to a child should be directed to Staffordshire County Council Emergency Duty Service on 0345 6042886.

Alternatively you can contact Staffordshire Police on 101 or dial 999 in an emergency where someone is at risk of immediate harm.

4. ORGANISED ACTIVITIES FOR CHILDREN IN PUBLIC SETTINGS

The Children Act 1989 (as amended by the Care Standards Act 2000) regulates the provision of 'day care'. This is defined as care provided at any time for children under the age of 8 on premises other than domestic premises.

It is unlikely that any public setting will need to register under the Act, but the standards should nevertheless be noted and used wherever possible. This represents good practice and a common sense approach. The Act does **not apply** if the total period during any day on which care is provided is **two hours or less** (thus exempting most activities, events and groups).

It also does not apply if such care (even though exceeding 2 hours in the day) is provided at the premises on fewer than six days in any year if the person providing such day care has notified Ofsted in writing before the premises are so used for the first time in that year.

If the Act applies, it is an offence to provide day care unless registered to do so. It is therefore important that public settings either:

- Do not agree to care for any child for more than two hours in any day; or
- Check that a notification to Ofsted is in force and that no more than 5 such activities take place in any year; or
- Check the registration requirements before offering activities that are likely to be covered by the Act

National standards for day care have been issued under the Children Act 1989. The relevant standards are the National Standards for Sessional Care. Sessional care is day care for children under eight for a session of less than a continuous period of 4 hours in any day on non-domestic premises. The standards are written mainly with nursery care in mind but will only apply if a building is registered to provide day care. However, it is considered good practice to comply with these standards wherever possible.

There are 14 national standards dealing with all aspects of care from the suitability of the adults to health and safety requirements. To comply with as many of the standards as realistically possible, the following guidance should be adhered to:

- For craft activities and events where a high level of staff input/supervision is required and the audience is made up of children of all ages, implement a limit of 15 children per event - in line with the minimum staffing to children ratio (1:15 for 7-16 year olds) in the Children Act 1989. Where 2 or more staff are present, the maximum attendance figure can be increased in line with venue requirements.
- For family events and performance events for larger audiences, where a wide audience of children and parents or carers is present and staff input/supervision is minimal, limits on numbers should be implemented according to venue requirements.
- For events targeted at specific age groups, the staffing ratios in the Children Act 1989 should be followed wherever reasonably possible:
 - 1:3 for children under 2 years

- 1:4 for 2 year olds
- 1:8 for 3 - 7 year olds
- For all events children under 8 years must be accompanied by a responsible adult.
- There must be a first aid box complying with the Health and Safety (First Aid) Regulations 1981 in every community building or venue and preferably several members of staff trained in Emergency First Aid.
- There must be access to a telephone on the premises.
- Equipment must conform to safety standards.
- COSHH reports should be filled out for new materials and resources used in any activities or events with children, by a senior member of staff. All staff should be encouraged to attend the COSHH internal training course.
- Risk assessment forms should be filled out for all events and activities for children in all community libraries, by a senior member of staff. Where a regular event of similar content takes place repeatedly in the same location, eg parent and toddler group or story times, then only 1 risk assessment needs to be carried out at the outset. All staff should be encouraged to attend the risk assessment internal training course.
- The organisation accepts that when children are present in a building that noise levels will rise. Examples of acceptable levels are: a baby crying is acceptable, teenagers shouting at the top of their voices is not.
- Special needs should be catered for, wherever possible.

When planning an activity, the following should be considered;

- Suitable numbers of adults to supervise the event.
- When using outside speakers/entertainers, at least one member of staff should remain with the group at all times.
- General health and safety considerations must be borne in mind.
- Activities should not discriminate against any person on grounds of disability and must take any reasonable steps to enable disabled children can take part in the activity.
- Awareness of first aid arrangements.
- Maximum attendance figure, based on staff, space and the type of activity. If there is any doubt about the ability to control numbers, then limit the activity.
- Ensure that the activity complies strictly with the requirements of the building's fire certificate and any recommendations or requirements of the fire authority and the premises' insurers.
- Any publicity materials should specify the age of the children which the event is aimed at and clearly state starting and finishing times. It should include advice to parents and carers collecting children from an activity that they should instruct their children to stay in the building until collected.

During the activity

- A register of all children attending the event should be maintained, including:
 - name
 - address
 - telephone number
 - name and signature of parent or carer collecting
 - consent to activity
 - any known medical conditions and how they should be dealt with
 - All staff should be identifiable (by wearing staff badge).
- If a child wishes to leave an event, every effort should be made to persuade them to stay until the return of the parent or carer.

- A child should only be released into the care of the agreed parent or carer, unless previously agreed that the child would leave alone.
- A child should only be allowed to leave in the care of another child if it is deemed that the supervising child is of an age and competence to be able to accept responsibility for their own or another's safety and permission has been obtained from the parent or carer.
- Under no circumstances should a child ever be escorted home by a member of staff.
- Under no circumstances should a member of staff try to physically restrain a child from leaving the premises.
- Activities should be scheduled to end at least half an hour before the premises close to allow time for parents or carers who are late in collecting their child.

5. EVACUATION PROCEDURES

- A poster clearly displaying the location of the premises' assembly point should be clearly displayed.
- All staff must be familiar with procedures to ensure the safety of children, including any requirements imposed by the fire authority.
- On the sounding of the alarm, a nominated member of staff should have responsibility for checking that no unaccompanied children are left on the premises.
- Any unaccompanied children should be taken by staff to the assembly point and supervised until the parent or carer arrives to collect them. Children who are not expected to be met and who are allowed to leave the building unaccompanied should be allowed to make their own way home.
- During an organised activity, staff must lead children to the assembly point taking the register of children attending the event. The register must be checked to ensure that all children are safely accounted for. If any child is not present this must be reported immediately to the emergency services.

6. ADULTS IN AREAS DESIGNATED FOR CHILDREN'S USE

It is important to remember that adults may use public settings, including areas designated for children's use, for a variety of legitimate purposes. However, staff must be watchful of adults acting in ways that may threaten a child's safety and be responsive to any concerns expressed by a child.

Clearly this is a sensitive area so staff should be cautious, but as stated previously; a child's welfare is paramount.

If a member of staff observes an adult in an area designated for children who does not appear to be there for legitimate purposes, they should be politely asked by staff if they can be helped in any way. If necessary, the staff member should remain in the children's area with the adult, or the adult should be asked to leave the area. Any concerns about an adult's behaviour should be immediately shared with the senior staff member on duty.

Any areas designated for children need to be clearly signed as for the use of children and their parents or carers.

7. USE OF STAFF TOILETS

Where there is no public toilet on the premises, it is reasonable to allow children to use the staff facilities in an emergency. Staff should be in attendance for security purposes, but it is

strongly advised that staff do not enter the toilet with the child. Wherever possible, parents should be encouraged to accompany their child to the toilet, with staff escorting them to and from the staff areas for health and safety reasons.

8. CONSULTATION AND SURVEYS

When staff undertake consultation work and surveys, it is important that they should be aware of sensitivities regarding talking to children.

If it is proposed to consult or survey children under the age of 14, either on a 1:1 basis or as part of a focus group, permission should be sought from parents or carers in advance. If the resulting data is purely statistical, there will be no data protection considerations. However, if it may be possible to identify a child from the data produced, express permission should be sought from the parent or carer.

If it is proposed to undertake consultation or surveys in a public setting, notices should be displayed that explain why children are being approached. It is also strongly recommended that a publicity campaign takes place before the consultation or survey commences.

All interviews with children should take place in a public area and staff should wear identification at all times.

9. AVOIDING SITUATIONS WHERE STAFF MAY BE IN A VULNERABLE POSITION

It is important that staff working in public settings are aware of the following:

- A child should never be accompanied into a toilet, unless in an emergency.
- A child should never be allowed to sit on a member of staff's knee.
- When dealing with difficult situations with children, staff should always try to ensure another member of staff is present to observe and offer support if required.
- A child should not be led by the hand off the premises in search of a parent or carer. They should be kept safe until the parent or carer arrives. If there is cause to believe that the child has been abandoned/ forgotten, the police should be called.
- If a child is obviously distressed, staff should try to comfort them.
- Staff should never make arrangements to contact a child in a personal capacity
- Staff should not do things of a personal nature for a child that they can do for themselves.
- Staff should not be left alone with a child, for reasons of their own safety and liability.

10. DEALING WITH UNACCEPTABLE BEHAVIOUR

The organisation should have a written policy that defines unacceptable behaviour, including racist, sexist and other offensive language, to ensure that it is dealt with consistently. The policy should identify that staff that are expected to deal with such behaviour.

It is important that staff deal with such situations calmly and quietly and avoid putting themselves or others in danger.

Most Local Safeguarding Children Boards and Local Authorities have an anti-bullying policy that has been adopted by schools and other children's services. It is advised that organisations responsible for public settings should apply the same principles.

There should be a clear policy in place which ensures that any member of staff knows how to respond should they witness a child being bullied, or a child complains of being bullied to them.

11. FAMILY FRIENDLY

Staff should have empathy for parents with young children. They are our users of the future, as well as the present and so we should always endeavour to offer a family friendly environment.

Organisations responsible for public settings should consider whether they:

- Welcome breastfeeding and display a sign indicating this. Are staff sympathetic, and if requested is a suitable private room/area made available wherever possible?
- Welcome baby changing. Are staff supportive to parents needing to do this?
- Assist parents with pushchairs/buggies and those in wheelchairs who are entering or leaving the premises.

12. PHOTOGRAPHING CHILDREN

Care should be taken to seek prior consent from parents or carers when taking photographs of children on the premises in order to protect children's identity and prevent images of children being manipulated on the Internet.

The following guidelines should be followed:

- Never identify a child in a photograph by name, including posters, publicity materials or websites.
- Never use a photograph of an individual child or without seeking the consent of the parent or carer.
- It is generally considered to be acceptable to use large group shots without seeking consent, providing it is not possible to identify an individual child.

13. USE OF THE INTERNET

All public settings that provide access to the internet via computers, games consoles or mobile phones should have an acceptable use policy in place. This policy should clearly stipulate that all children under the age of 10 must be supervised by an adult when using the Internet.

SSCB strongly recommends that any organisation responsible for a public setting which provides internet access utilises filtering software eg Websense to prevent all users, but especially children, from accessing certain categories of sites.

It must be borne in mind that adults may attempt to approach a child on the premises via the internet. For this reason all children using the internet should be advised against divulging personal information for their own safety.

14. THE WIDER CONTEXT OF CHILD SAFETY

The Staffordshire Safeguarding Children Board (SSCB) is a statutory body responsible for developing, monitoring and reviewing child protection policies, procedures and practice issues and making sure training is available to agencies working with children. It brings together the main agencies; education, health, social care, police and the voluntary sector working in partnership with children, families and communities to provide an effective system that safeguards and promotes the welfare of children in need of protection.

Organisations responsible for public settings must ensure that all staff have access to current police, social care and relevant community contacts to support their work. These and other useful contacts can be found in the appendices of the Staffordshire Safeguarding Children Boards' Procedures which is available on the internet at <http://www.staffsscb.org.uk>

When services are delivered through partnership projects it is essential that the policy of the organisation responsible for the public setting is synthesised with that of other partners and a common approach to child safety is agreed as part of the partnership agreement.

Child safety is a society-wide responsibility. It is important for all staff to be aware that as part of the community working with children they share in this responsibility. Appropriate training should be provided to staff in order to maintain their knowledge and understanding of safeguarding issues and awareness of local procedures.

APPENDIX 1

DISCLOSURE & BARRING SERVICE CHECKS

The Disclosure & Barring Services (DBS) has been established to improve access to information on criminal records held by the police. This service enables criminal convictions checks to be undertaken for candidates selected to work with vulnerable client groups, including children.

How it happens;

A disclosure application form must be filled in by the individual and submitted by an authorised body.

The original copy of a range of ID, which must be photocopied and authorised by an appropriate officer is required. Each organisation will then have its own designated officer, usually in human resources, who will be the counter signatory, and who will send off the form to the CRB.

The DBS will return the disclosure certificate to the counter-signatory with a copy to the applicant.

When a criminal record is revealed;

Where there is a perceived risk of future misconduct, based on information in the disclosure, this should be discussed with the individual.

If the report relates to a candidate for a post, and it is decided not to appoint, where appropriate the candidate should be given written reasons for the decision. An appointment should not be made before the disclosure has been received.

The fact that a person has a criminal record does not automatically render him or her unsuitable for work with children or other vulnerable groups. Research has shown that one adult male in three has a criminal record (excluding motoring offences) by the time he is thirty. Furthermore, NSPCC records suggest that only one in ten people who pose a threat to children actually have a past conviction.

However, it is not only sexual offences, which may render a person unsuitable. A person's suitability should be looked at as a whole in the light of all the information available.

In deciding the relevance of convictions and/or other matters revealed in a Disclosure, a number of points should be considered:

a. What is the nature of the offence?

In general, convictions of sexual, violent or drug offences will be particularly strong, contra-indications for work with children or other vulnerable groups.

b. What is the nature of the appointment?

Often, the nature of the appointment will help to assess the relevance of the conviction. For example, serious sexual, violent, drug or drink offences would give rise to particular concern

where the position was one of providing care. Driving or drink offences would be relevant in situations involving transport of children or other vulnerable groups.

c. When did the offence occur?

Offences, which took place many years in the past, may often have less relevance than recent offences.

However, convictions for serious violent or sexual offences or serious offences involving substance abuse are more likely to give cause for continuing concern than, say an isolated case of dishonesty committed when the person was young. The chance for rehabilitation must be weighed against the need to protect children or other vulnerable groups.

d. Frequency of offence

Similarly, a series of offences over a period of time is more likely to give cause for concern than an isolated minor conviction.

APPENDIX 2

CHILD PROTECTION ISSUES

Whilst many staff are rarely directly involved in child protection issues it is important that everyone is aware of their duties both as responsible members of society and as employees.

All organisations should have their own child protection procedures, copies of which should be available for both public and staff. It is also valuable for partnership working to invite someone from the children's social care team to talk to staff.

Section 47 of the Children Act 1989 states that the Local Authority has a duty to investigate if a child is believed to be at risk of significant harm. As responsible adults, everyone has a duty to report any suspicion of significant harm.

Referrals to children's social care can be made anonymously and can be made by a member of the public or staff. It is not necessary to have proof but you do need to have serious concern. In cases of suspected ill treatment, severe neglect or abuse the child's welfare is paramount and you will not be contravening the data protection act if you disclose names and addresses to children's social care or the Police. It will help children's social care investigate the case if you can supply context and evidence and your reasons for suspicion.

If you have serious concerns about a child it is helpful to record the following:

- the concerns you have
- what actions you have taken
- any physical signs that you have seen
- what the child has said
- the observations of any other member of staff

Make sure you inform your manager.

Inform either children's social care or the police. The social worker will check files; contact the police and school to find out if anything is known about the family. From this information they will decide whether they need to take the matter further. It could be that no action is required or that the family can be offered support. Child protection procedures will only be followed if all the information they collate suggest it is appropriate.

Where a child protection investigation is indicated, they will arrange a meeting with the police officer from the child protection unit to decide what action the investigation requires. You should be contacted and informed about what is happening.

Children are most likely to disclose information about abuse to people outside the family and often to a trusted adult. If this should happen try and stay calm;

- listen
- respect what the child is telling you
- don't interrupt, prompt or ask questions
- reassure the child if they are upset
- you must tell the child that you cannot keep the information secret
- write down everything, date, time, what has been said, any injuries you have seen

- often children will not want to make eye contact with you but will carry on looking at a book or colouring as they talk

As with all witnessed instances, inform your line manager and children's social care. Remember that the guiding principle of child protection is that the community has a responsibility for the wellbeing of all children and that all professionals should work together to provide that protection.

What to do if you have suspicions about another member of staff;

The most important consideration is the welfare of the child. Refer to your local guidelines and inform the local authority designated officer (LADO). As a general rule, in the first instance report your concern to your manager. If it is your manager you are concerned about, go directly to the most senior person with responsibility for children and young people within your building authority. Managers should treat any suspicion as urgent and the person concerned should be removed from duties that involve direct contact with children. The staff member should be informed of your concerns. Unless there has been a complaint from a child, the situation can usually be dealt with as an internal matter.

Remember that the guiding principle of child protection is that the community has a responsibility for the well-being of all children and that all professionals should work together to provide that protection.

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NEWCASTLE-UNDER-LYME BOROUGH COUNCIL
EXECUTIVE MANAGEMENT TEAM'S REPORT TO THE
CABINET

Date 4 January, 2018

1. **REPORT TITLE** Procurement for Elections Printing Service
- Submitted by:** Interim Head of Paid Service – Dave Adams
- Portfolio:** Corporate and Service Improvement, People and Partnerships
- Ward(s) affected:** All

Purpose of the Report

To inform Members of the procurement process that is currently in progress and seeks approval to award a contract to the successful provider.

Recommendations

- 1) That Cabinet authorises the Interim Head of Paid Service - in consultation with the Portfolio Holder to accept the most economically advantageous tender within the existing budget provision.

Reasons

To ensure that the council continues to secure value for money in the procurement of printing services for elections.

1. **Background**

- 1.1 The Council has previously awarded short term contracts for the delivery of an elections printing service and has been required faced with a snap decision to call a general election to extend this contract. Officers are now looking to put in place a longer term solution/contract possibly benefitting from greater economies of scale.
- 1.2 As the estimated value of the contract is likely to exceed EU procurement thresholds a contract notice has been published in the OJEU (Official Journal of the European Union).

2. **Issues**

- 2.1 The Elections and Electoral Registration function is heavily reliant on having suitably robust printing processes in place. These processes cover the full spectrum of the service from the Annual Canvass and the printing of Household Enquiry Forms (HEF's) and Invitation to Register (ITR) through to the printing of poll cards, ballot papers and postal vote packs.
- 2.2 The contract for print services will cover all elections that will be held over the next five years and the majority of expenditure that will be incurred will also be recoverable through the grants that we receive from the Cabinet Office to cover those elections that we hold on behalf of others. These include Combined District & Parish in 2018, European Elections

(subject to legislation) in 2019, County Council in 2020, Police and Crime Commissioner in 2021, Combined Parliamentary, District and parish elections in 2022. The tender also has the provision to cover any ad-hoc by-elections, Neighbourhood Plan and other Referenda.

3. **Options Considered**

- 3.1 To stay with the current provider would mean that we were not complying with the Council's Contract Procedures and Financial Regulations. There is therefore a requirement to go out to tender for printing services in respect of Elections and Electoral Registration

4. **Proposal**

- 4.1 That the Interim Head of Paid Service in consultation with the Portfolio holder be authorised to award the contract to the most economically advantageous tender within the current provision.

5 **Legal and Statutory Implications**

- 5.1 The decisions taken are in accordance with the Council's internal rules as set out in the Constitution and within European Procurement and UK Regulations.

6 **Equality Impact Assessment**

- 6.1 There are no differential equality impact issues identified from this proposal

7 **Financial and Resource Implications**

- 7.1 Whilst the value of the contract is estimated to exceed current EU Procurement Thresholds the Borough Council print costs for all Elections with the exception of our own district elections are re-couped from central government

8. **Major Risks**

- 8.1 A full risk assessment has been completed in respect of the Election Process, this has been completed based on Electoral commission guidance.

NEWCASTLE-UNDER-LYME BOROUGH COUNCIL
EXECUTIVE MANAGEMENT TEAM'S REPORT TO THE
CABINET

4th January 2018

1. **REPORT TITLE** Potential disposal of Blackfriars car park
- Submitted by:** Engineering Manager – Graham Williams
- Portfolio:** Finance and Resources
- Ward(s) affected:** Town

Purpose of the Report

To seek authority for the Blackfriars car park off street parking order to be confirmed if required.

Recommendations

That members approve that the confirmation of the Blackfriars car park off street parking order be delegated to the Executive Director (Regeneration and Development), following consultation with the relevant Cabinet member, as required.

Reasons

The land forming the Blackfriars car park is adjacent to a larger area of land, also owned by the Borough Council.

The adjacent area of land was leased to a third party which expired in July 2017 and was not renewed by the tenant. The 22-space car park is significantly underused and in conjunction with the adjacent NBC land provides a suitable area of land for redevelopment.

To enable this potential redevelopment of the land it is necessary to be able to remove the off street parking order relating to this piece of land thereby allowing the land to be offered for sale.

1. **Background**

- 1.1. The area of land currently known as Blackfriars car park was formed when the larger area was split into two areas one of which was leased to an adjoining property and the remainder formed the current car park.

2. **Issues**

- 2.1. Over recent years (since closure of the former Cattle Market) the usage of the car park has significantly reduced from being nearly full during most parts of the working day to only half a dozen or so cars using the car park per day.
- 2.2. The effect of the low occupancy levels and the rising running costs affects the viability of the car park.

2.3. The tenant did not wish to extend the lease on the Newcastle Borough Council land adjacent to the car park and the lease expired in July 2017.

3. **Proposal**

- 3.1. The collective area of the car park and the previously leased area provides a viable piece of land for redevelopment either alone or in conjunction with other adjoining land owned by a third party.
- 3.2. To enable redevelopment of the car park the town centre Off Street Parking Order (Order) which covers the car parks in the town centre needs to be amended by deleting the car from the order.
- 3.3. The statutory consultation period ended on the 20th November and no objections were received.
- 3.4. It is proposed that the authority to make the order is delegated to the Executive Director – Regeneration and Development, following consultation with the relevant Cabinet member, should the need arise to complete the removal of the Blackfriars car park from the Order. This will allow the car park to operate in the current manner until the redevelopment is finalised.

4. **Outcomes Linked to Sustainable Community Strategy and Corporate Priorities**

The removal of Blackfriars car park would facilitate the redevelopment of the area thereby contributing to the Council's priority of creating a Borough of opportunity.

5. **Legal and Statutory Implications**

The removal of the car park from the Off Street Parking Order is controlled by the Road Traffic Act 1984 and the associated legislation.

6. **Financial and Resource Implications**

Since the cessation of the lease for part of the overall site the Council received annual income from car parking of about £3k per annum with running costs amounting to a similar figure (excluding any maintenance and repair costs).

The Council could attempt to lease out the land or would have the opportunity to dispose of the overall site thereby generating a capital receipt.

7. **Major Risks**

Any objections could delay the removal of the car park from the Off Street Parking Order, which would delay and potential sale and redevelopment of the land.