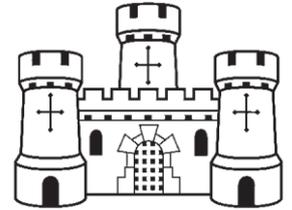


Public Document Pack

Date of meeting Wednesday, 10th August, 2022
Time 7.00 pm
Venue Garden & Astley Rooms - Castle House, Barracks Road,
Newcastle, Staffs. ST5 1BL
Contact Denise French - 742211



**NEWCASTLE
UNDER LYME**
BOROUGH COUNCIL

Castle House
Barracks Road
Newcastle-under-Lyme
Staffordshire
ST5 1BL

Economy & Place Scrutiny Committee

AGENDA

PART 1 – OPEN AGENDA

1 APOLOGIES

2 DECLARATIONS OF INTEREST

3 MINUTES OF PREVIOUS MEETING

(Pages 3 - 10)

To consider the minutes of the last meeting of the Committee held on 15 June 2022.

4 LOCAL PLAN - ISSUES AND OPTIONS - CALL-IN

(Pages 11 - 108)

5 PUBLIC QUESTION TIME

Any member of the public wishing to submit a question must serve two clear days' notice, in writing, of any such question to the Borough Council.

6 URGENT BUSINESS

To consider any business which is urgent within the meaning of Section 100B (4) of the Local Government Act 1972.

Members: Councillors Beeston, Bettley-Smith, Burnett, Edginton-Plunkett, Gorton, Grocott, Hutchison (Vice-Chair), Moffat, Panter, Skelding and G White (Chair)

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 Quorum: The meeting quorum for Scrutiny Committees is 4 of the 11 members.

SUBSTITUTE MEMBER SCHEME (Section B5 – Rule 2 of Constitution)

The Constitution provides for the appointment of Substitute members to attend Committees. The named Substitutes for this meeting are listed below:-

Substitute Members:	Allport	S Jones
	Crisp	Stubbs
	Dymond	J Tagg
	Fox-Hewitt	Whieldon
	Holland	S White
	D Jones	

If you are unable to attend this meeting and wish to appoint a Substitute to attend in your place you need to:

- Identify a Substitute member from the list above who is able to attend on your behalf
- Notify the Chairman of the Committee (at least 24 hours before the meeting is due to take place)

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 THROUGH THE FIRE EXIT DOORS.

ON EXITING THE BUILDING, PLEASE ASSEMBLE AT THE FRONT OF THE BUILDING BY THE STATUE OF QUEEN VICTORIA. DO NOT RE-ENTER THE BUILDING UNTIL ADVISED TO DO SO.

Agenda Item 3

Economy & Place Scrutiny Committee - 15/06/22

ECONOMY & PLACE SCRUTINY COMMITTEE

Wednesday, 15th June, 2022
Time of Commencement: 7.00 pm

[View the agenda here](#)

[Watch the meeting here](#)

- Present:** Councillor Gary White (Chair)
- Councillors:** Susan Beeston David Grocott Barry Panter
Joel Edginton-Plunkett David Hutchison Craig Skelding
Richard Gorton Sue Moffat
- Apologies:** Councillor(s) Robert Bettley-Smith and Gillian Burnett
- Substitutes:** Councillor John Tagg
Deputy Mayor - Councillor Simon White (In place of Mayor - Councillor Gillian Burnett)
- Officers:** Daniel Dickinson Head of Legal & Governance /Monitoring Officer
Geoff Durham Mayor's Secretary / Member Support Officer
Georgina Evans Head of Strategy, People and Performance
Jemma March Planning Policy Manager
Simon McEneny Executive Director of Growth and Development
- Also in attendance:** HS2
Staffordshire Police
Portfolio Holder – Strategic Planning
Portfolio Holder – Community Safety and Wellbeing
Portfolio Holder – Finance, Town Centres and Growth

1. **DECLARATIONS OF INTEREST**

There were no declarations of interest stated.

2. **MINUTES OF PREVIOUS MEETING**

Resolved: That the minutes of the meeting held on 17 March, 2022 be agreed as a correct record.

3. **UPDATE FROM CABINET**

Economy & Place Scrutiny Committee - 15/06/22

The BID Manager, Alex Taylor had asked for support to prepare some financial bids. However, Alex had now left the BID and a new manager had started at the beginning of the month. Discussions were taking place as to the level of support needed.

4. HS2 PRESENTATION

Members received a presentation giving an overview of how HS2 would be put in place across the Borough.

The presentation outlined the different phases of the development and included maps of the route through the Borough. In addition, improvement works were shown which included Hanchurch Junction 15 of the M6 being changed to manage the traffic flow coming through; A footbridge would be placed over the A500 and mitigation works and noise barriers would be installed.

The Chair asked how much disruption would hit the communities across the Borough over the next 5 to 7 years and when and how would the communities be engaged with.

Members were advised that HS2 representatives were going out and about into the communities – holding regular meetings, either virtual or face to face. At present, other than the smaller scale activities that people were being made aware of, more information events would be held to share the designs.

The Chair stated that there were two major concerns for Whitmore and Madeley; the two tunnels which required 11,000v cables to run the tunnelling machines and the routing of those cables which could be disruptive. A request had been made to route the cables outside of any major conurbation and the Chair asked if there was any update on that.

There were no details on this at present but HS2 would inform the Committee in due course.

A question was asked regarding the status and powers of the security guards who had been seen in television footage, dressed in black with their faces covered and no ID.

These people were part of the national enforcement team and had their faces covered for their own safety. HS2 were always aware of who was on site at any particular time. They had no physical powers to remove people but the police had been on site.

Regarding opportunities for local people, HS2 was asked if the stretch going through North Staffordshire would favour North Staffordshire companies in the bidding process.

The procurement process had to be open and fair to ensure the best deal for the tax payer, therefore it had to be open to everyone, not just within North Staffordshire. However, local businesses were given all the information they needed to give them the best chance of being competitive.

The presentation had outlined ancient woodland being replaced with new plants and vegetation. This was not replacing like for like! Also there had been an instance where someone had tried to engage with a presentation and was prevented from

going in. In addition, was there a chance to make HS2 work for the Borough through jobs, connectivity, re-imagining of the railways locally or was it all a done deal.

In terms of the biodiversity angle, it was recognised that an ancient woodland could not be replaced as it was but a lot of the benefit, for example the soil would be translocated off the site and taken to the new sites. Wherever possible, the take-down of ancient woodlands would be minimised. The figures were not currently known but these would be shared at a later date.

Regarding the ability to feed into the designs, landowners would be engaged with to ensure that their insight was considered.

In relation to the groundwork charities, £5m was mentioned. Did organisations who claimed it have to be directly affected by the work of HS2.

The total was £5m but for a local project, up to £75,000 could be applied for or there was the strategic project of over £100,000. As part of the management of the funds, HS2 would look at what other awards had been made to ensure that they were spread out evenly across communities.

The presentation had covered the dualling of Clayton Road from Junction 15 up to Newcastle. HS2 was asked how this would be done.

An extra lane would be put in on the side coming down to Eddie Stobarts. The Newcastle/Trentham Road would be upgraded with a signalised junction. Also, the Blackbrook junction at the Swan with Two Necks which was a bad junction was being considered to become a signalised junction.

The Chair stated that HS2 would be asked to come back when there was anything more substantive to consider and discuss. In addition, responses to the questions that had not been answered this evening would be circulated to Members in due course.

Resolved: That the information be received.

[Watch the debate here](#)

5. **POLICING PRESENCE IN NEWCASTLE UNDER LYME TOWN CENTRE**

A presentation was given by Staffordshire Police regarding policing presence in the town centre. This had been brought to Scrutiny following concerns raised at the previous meeting about footfall being compromised due to issues within the town centre and the lack of police presence during the daytime / weekend.

In terms of policing around the town centre it had been acknowledged that there had been an increase in crime incidents and anti-social behaviour.

Newcastle, at present, had neighbourhood teams based here with three shifts covering from 8am until midnight, with the Safer Nights programme on a Friday and Saturday night running until 3am.

There were currently 4 police constables dedicated to the town centre, split across the shifts 2:1:1 with each shift having a dedicated PCSO.

Economy & Place Scrutiny Committee - 15/06/22

Being based at Castle House was advantageous as it created a good working relationship with the Council's Anti-Social Behaviour Team and the Rough Sleeping Team.

In the last few weeks there had been a drive to increase police presence, not only in terms of physical presence but also so that local businesses and users of the town would know what was going on from a policing point of view through the Smart Alert System.

In terms of where policing would be moving into the future, from 27 June, Staffordshire Police would be moving from a response hub model. Currently, officers servicing 999 calls were based out of Hanley and travelled to Newcastle at the commencement of their shift. From 27 June, seventy officers would be based at Newcastle – split across five shifts. At present, officers on the response teams rotated around areas to north of Staffordshire. With this transformation model, officers based at Newcastle would work in Newcastle, therefore increasing their local knowledge. The ability to respond to immediate incidents such as public order issues would be increased.

The Police were in communication with the Council around how CPNW and CPN's were processed in terms of breaches.

The Chair referred to there being more police presence in Castle House and asked if this meant more police hours physically on the streets.

By having local response officers, it was hoped that local response officers would know what problems were occurring in Newcastle. The reduction in response time would put less onto the neighbourhood officers who could then concentrate more on the problem solving issues.

The timings of the Safer Nights scheme on a Friday and Saturday Nights were requested and also, how many officers were present.

With Safer Nights, the PCSO's went on duty before the PC's. The Neighbourhood team went on duty from 5pm and worked through to 3am. PC's presence on the town centre was from 10pm. Under the new model, for the first three to six months, the Safer Nights role would be owned by the night shift which would work a duty of 10pm to 7am. In terms of numbers, at present the full complement of the neighbourhood shift went on duty, which was around six or seven PC's. In addition a carrier would come across from Hanley and would have a similar number on one of the larger police vehicles.

Under the new model, the neighbourhood teams would have ownership for early intervention from 8pm to 10.30pm in the town centre. Officers would be going into the pubs to find out what they had got planned for that evening and engaging with the licensees. From 10.30pm to 5am the response night crew would take over. Newcastle's night time economy ended at around 2.30am but officers would remain on duty until at least 3am.

A comment was made that for protests such as Walleys Quarry or HS2, the police presence was high but there never seemed to be anyone in the town centre when needed.

Walleys Quarry had become very resource intensive for the police so a decision was made that it become a Force response thus putting a command structure in place so

it would be overseen by a Chief Constable. The command structure would fall through the ranks if protests became disruptive and this would relieve some of the pressure on the neighbourhood teams.

The review timescale of three to six months was queried. This was to do with how Safer Nights in Newcastle would be policed by the night shift.

The biggest issue in the town centre was 'rough sitting' and this needed to be the number one focus. The Council and Police needed to work together to try and stop it from happening. In addition, it was queried whether the police were going out to businesses to discuss this issue as premises owners were not making complaints. It was off-putting for shoppers wanting to go into shops when there was someone sitting outside.

The police had limited powers to move them on unless they were breaching the PSPO in place.

Members were advised of a link to a survey about the police service. This link would be forwarded to all Members.

Resolved: That the information be received.

[Watch the debate here](#)

6. **BOROUGH LOCAL PLAN**

The Portfolio Holder for Planning and Growth, Councillor Fear introduced the item, drawing Members' attention to paragraphs 1.6, 1.9 and section 2 of the report.

In January, 2021 the Council set out to do a plan for the Borough and this was the first consultation for the plan, running for 14 weeks between November, 2021 and January, 2022. Two more consultations would follow in due course.

Consultations took place both face to face and virtually with 3,649 comments being received, two petitions and 757 'template' letters.

A key theme coming out of the consultation was a demand to use brownfield sites, wherever possible, to protect Green Belt land. There was a lot of discussion on infrastructure and how it would impact on communities. Climate change, Brexit and Covid were also touched upon.

All comments were published and made publically available on the consultation portal.

It was stated that lots of people had difficulty looking at the consultation online and this needed to be acknowledged. People had also been expecting comments made at face to face meetings to be gathered.

There had been some issues online because a new software provider had been brought in to do a consultation portal. It was also found that people had made technical errors on their side. However, when anyone had a problem they were instantly responded to.

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It was asked whether the Council was complying with its Statement of Community Involvement.

The only anomaly had been that the Statement of Community Involvement stated that venues would have notepaper for people to make comments on. This was made difficult by covid but also with 37 questions in the document it may have been better to have produced a leaflet with the questions written down but this could have put people off. Therefore anything that was brought into the venue was taken away as a representation, it was logged and the persons details were taken.

The legality of treating the 757 individual template letters as a petition was questioned.

The letters were summarised for the presentation and the strength of feeling from those letters came across very clearly and all of the comments would be taken into account.

From a legal point of view, there was nothing to say in which way such responses should be treated in a local plan consultation process. It was all in terms of reasonableness and fairness of the process and principles of natural justice. The opportunity to make comments and have those properly considered and taken into account.

The budget was also questioned, as to whether the consultation process had been within budget as it had gone on longer than planned.

In terms of extending the consultation, two further physical (in Keele and Audley), and one further virtual event were held – it was more of a time delay and therefore would have remained within the consultation budget.

It was queried whether the Scrutiny Committee would have the opportunity to get more involved with some of the suggestions that had come forward from residents.

The document looked at the process of consultation and in that respect it was hoped that some of the worries had been dealt with. Further consultation documents would be brought back to this committee. If Members wanted to underline things at this time before it went before Cabinet, that would be fine.

Resolved: That the feedback on the Newcastle under Lyme Local Plan Issues & Strategic Options consultation be noted, and following review, provide comments for further consideration at Cabinet.

[Watch the debate here](#)

7. FUTURE HIGH STREETS FUND AND TOWN DEALS FOR KIDSGROVE AND NEWCASTLE UNDER LYME PRESENTATION

The Committee received a presentation on the Future High Streets and Town Deals Funding projects.

Future High Streets Fund:

The former Civic Offices building had now been demolished and once the basement area had been filled in, would be handed over as a complete site at the end of the month. The site would be used for mixed use development.

The York Place building had now been purchased by the Council and redevelopment options were been looked at following the appointment of Wilmot Dixon.

Kidsgrove Town Deal:

The Chatterley Valley Scheme had been made possible through the use of Town Deal Funds and works were starting on site shortly. This would include a roundabout, a new entrance to the site and relocation of some utilities and would become an advanced ceramic campus.

There would be an upgrade to Kidsgrove Station, canal enhancements and a shared service hub.

Kidsgrove Sports Centre had now had the pool properly surfaced, tested and filled with water. It was hoped that it would reopen in the third or fourth week in July.

Newcastle Town Deal:

The Knutton Masterplan and Cross Street Chesterton Masterplans were being considered.

A training facility would be developed for training and research into circus skills alongside a Centre for Performing Arts in the town centre.

Also, enhancing key gateway sites and walking and cycling networks and a smart digital infrastructure.

The Midway car park would be demolished upon completion of the new car park on the Ryecroft site and would be replaced with whatever the market required at that time, be it residential or office use.

Resolved: That the information be received.

[Watch the debate here](#)

8. WORK PROGRAMME

The Chair asked Members to email any ideas for Scrutiny to himself which would then be incorporated into the Work Programme.

9. PUBLIC QUESTION TIME

There were no public questions.

10. URGENT BUSINESS

There was no urgent business.

**Councillor Gary White
Chair**

Economy & Place Scrutiny Committee - 15/06/22

Meeting concluded at 9.11 pm



NEWCASTLE-UNDER-LYME BOROUGH COUNCIL

EXECUTIVE MANAGEMENT TEAM'S REPORT TO

Economy and Place Scrutiny Committee 10 August 2022

Report Title: Local Plan Issues and Options – Call-in

Submitted by: Monitoring Officer

Portfolios: Strategic Planning

Ward(s) affected: All

Purpose of the Report

To outline the call-in process and options available to the committee

Recommendation

That the committee decides whether or not to offer Cabinet any advice in respect of the decision taken by Cabinet on this issue on 19 July 2022.

Reasons

To comply with the requirements of the Constitution.

1. **Background**

1.1 On 15 June 2022, the Economy and Place Scrutiny Committee received a presentation and report on the outcomes of the Borough Local Plan Issues and Strategic Options Consultation. Minutes of the deliberations of that committee are set out on the Council's website. The committee resolved:-

“That the feedback on the Newcastle under Lyme Local Plan Issues & Strategic Options consultation be noted, and following review, provide comments for further consideration at Cabinet.”

1.2 On 19 July 2022, Cabinet received a report providing feedback on the Local Plan Issues and Strategic Options Consultation. Cabinet resolved:-

“That:

- 1) The feedback on the Newcastle under Lyme Local Plan Issues & Strategic Options consultation be noted; and*

2) *The feedback received from the Economy and Place Scrutiny Committee be noted.*

1.3 On 20 July 2022, the Monitoring Officer received notification of a call-in of the 19 July Cabinet decision, supported by the requisite number of members to validate the call-in request in accordance with the Council's constitution.

2. **Issues**

2.1 Section D3 (Scrutiny Procedure Rules) of the Council's constitution sets out the process to be followed in respect of a scrutiny hearing of the call-in. Pages 182 to 185, in particular, set out the hearing procedure and are reproduced below:

(Extract from the constitution, Part D Scrutiny, section D3 Scrutiny Procedure Rules).

PROCEDURE FOR A CALL-IN TO A SCRUTINY COMMITTEE

"16.4 The Chair will retain full discretion to conduct a Call-In as s/he sees fit, however the following procedure will ordinarily apply (and shall be published in the meeting agenda).

(a) Call-in Members are requested to nominate a single spokesperson to outline the reasons for the call-in and the desired outcome. Any other Member calling in the decision who wishes to add any additional information may also address the meeting. However, Call-In Members will make every effort to avoid repetition. A maximum of five Call-In Members will be permitted to speak.

(b) The timings set out in the procedure are for guidance only and the Chair may at his or her discretion change the timings, depending on the subject matter of the Call-In and the level of public interest.

(c) Where questions are permitted within the procedure, they will be asked and answered succinctly and will not be used as an opportunity to deliver speeches. Officers may be invited to attend with the Respondent, who will usually be the Cabinet Member, and may also address the meeting on technical issues (if requested to do so by the Cabinet Member).

(d) Visiting Members:-

(i) may not vote on committee business;

(ii) will notify the Chair before the start of the meeting, if they wish to speak on a particular item;

(iii) will, at the discretion of the Chair, be invited to speak at the beginning of the Call-In and may be invited to sum up at the end of a debate, at the Chair's discretion.

(iv) will not, other than as provided for in paragraph 16.4(c) above or by the Chair, be permitted to participate in any debate at the meeting.

(e) The Call-In Members or the Respondent will confirm their attendance at the Call-In hearing and must notify the Chair at least 3 working days prior to the date scheduled for the Call-In hearing if they propose to call witnesses or introduce documentary or other evidence in support of their case, including details of the proposed format of the

evidence. The Chair will, in consultation with the Monitoring Officer consider the appropriateness of the proposals to the subject matter of the Call-In and the impact on arrangements for the hearing itself, including the indicative timescales set out in the procedure.

Hearings Procedure

16.5 Subject to the Chair's discretion, the procedure for hearings will be as follows:-

Opening statements

(a) The Lead Call-in Member will address the meeting outlining (a) the reasons for the call-in; and (b) the desired outcome from the call-in. The reasons given will be consistent with those set out in the Notice of call-in (or any changes agreed under Paragraph 16.3). The Call-in Members as a group to be allocated a maximum of 30 minutes speaking time in total.

(b) Visiting Members (who have provided notice) may address the Committee at this point. Visiting members to be allocated a maximum 15 minutes speaking time in total – up to 5 minutes per Member.

(c) Cabinet Member will respond to the Call-In. The Cabinet may call witnesses at this point. The Cabinet Member and any witnesses to be allocated a maximum of 30 minutes speaking time in total.

(d) The Call-In Members may ask questions of the Cabinet Member. A maximum 15 minutes in total to be allocated for this part of the meeting.

Questions and debate by the Committee.

(e) The Committee may ask questions of the Cabinet Member and Call-In Members and debate what it has heard. A maximum 30 minutes in total to be allocated for this part of the meeting.

Conclusion of the Debate

(f) Concluding remarks from the Lead Call-in Member. A maximum 15 minutes in total to be allocated.

(g) Concluding remarks from Cabinet Member(s). A maximum 15 minutes in total to be allocated.

(h) Committee to discuss what it has heard and may make any recommendations to the Cabinet Member or Cabinet. A maximum 15 minutes in total to be allocated.

Guidance on options available to the Committee;

(i) The Committee may decide that the original Cabinet/Cabinet Member decision stands.

(j) The Committee may wish to make a recommendation(s) which change the substantive decision which will be referred back to Cabinet or the Cabinet Member for consideration.

(k) The Committee may wish to offer advice or make any recommendations which do not change the substantive decision. (For example: establish a cross party working group; how the decision making process could have been improved on for the future and suggestion relating to consultation and engagement improvements). The Cabinet Member in attendance may agree to accept the advice or recommendation(s).

Action following a Hearing

16.6 As soon as is reasonably practicable following the hearing of a call-in, the Chair will give notice on the Monitoring officer either;

(a) that the Committee is not offering any advice or any advice that needs to be considered before a relevant decision(s) can be implemented; or

(b) that the Committee is offering advice in a report accompanying the notice that it requires the decision taker to consider before any further action is taken.

16.7 In the event of a notice under paragraph 16.6(a) above, any decision awaiting implementation may be implemented immediately, and any advice offered is to be noted.

16.8 In the event of a notice under paragraph 16.6(b) above the report will be submitted to the decision taker who will decide what action to take in respect of any decision awaiting implementation or to be taken and whether to adopt any or all of the advice contained in the report.

16.9 Any further call-in notices given in respect of a decision that has been considered under this process will not operate to defer the implementation of the decision in question.”

2.2 In the case of 16.6(a), no further action is required from Cabinet

2.3 In the case of 16.6(b), Cabinet shall meet to consider the recommendations and determine whether or not to amend its original decision in light of the same.

3. **Proposal**

3.1 That the committee decides whether or not to offer Cabinet any advice in respect of the decision taken by Cabinet on this issue on 19 July 2022.

4. **Reasons for Proposed Solution**

4.1 To comply with the requirements of the Constitution.

5. **Options Considered**

5.1 N/A

6. **Legal and Statutory Implications**

6.1 The legal and statutory implications in respect of the Local Plan process and Issues and Options Stage are dealt with in the two reports referred to. In respect of the scrutiny hearing itself, compliance with the relevant legal and statutory requirements is assured through compliance with the process set out above and in the Constitution.

7. **Equality Impact Assessment**

7.1 N/A

8. **Financial and Resource Implications**

8.1 In respect of the Local Plan process, these implications are addressed in the two reports referred to. Any implications flowing from any recommendations this committee may make will be considered as part of any report taken back to Cabinet in respect of the same.

8.2 There are no additional financial or resource implications associated with the scrutiny hearing itself, other than the internal resource required to support/administer the same.

9. **Major Risks**

9.1 None identified in respect of the scrutiny hearing process.

10. **UN Sustainable Development Goals (UNSDG)**

10.1 None identified in respect of the scrutiny hearing process.

11. **Key Decision Information**

11.1 This is not a key decision.

12. **Earlier Cabinet/Committee Resolutions**

12.1 Referred to in the text above.

13. **List of Appendices**

13.1 Call-in Notice 20 July 2022

13.2 Cabinet Report 19 July 2022

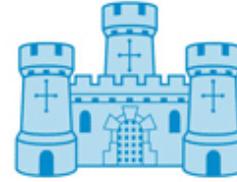
13.3 Letter from NuLBC CEX, dated 18th February 2022

14. **Background Papers**

14.1 The following reports and the background documents associated with the same:-

Report to Economy and Place Scrutiny Committee dated 15 June 2022:

<https://moderngov.newcastle-staffs.gov.uk/ieListDocuments.aspx?CId=467&MId=4163>



CALL-IN REQUEST FORM

Decision reference/minute no.	LOCAL PLAN ISSUES AND STRATEGIC OPTIONS - CONSULTATION FEEDBACK ref: 1130
Date of publication of decision:	20/07/2022
Decision taken by:	Cabinet
This form must be returned to the Chief Executive within 7 working days of the decision being published with at least 5 signatures	
Decision called-in:	
That:	
<ol style="list-style-type: none"> 1. The feedback on the Newcastle under Lyme Local Plan Issues & Strategic Options consultation be noted; and 2. The feedback received from the Economy and Place Scrutiny Committee be noted 	
A call-in should satisfy one or more of the following criteria.	
Which of the following criteria supports the call-in of this decision? (please tick)	
<input type="checkbox"/>	The decision may be contrary to the budget or policy framework set by the Council and the Monitoring Officer has advised accordingly
<input type="checkbox"/>	The decision is inconsistent with another Council policy
<input type="checkbox"/>	The decision is inconsistent with a previous Overview and Scrutiny recommendation, which has been accepted by the Council or the Cabinet
<input type="checkbox"/>	The decision maker has not taken into account relevant considerations and this can be demonstrated by reference to the documents supporting the decision
<input checked="" type="checkbox"/>	The decision maker has failed to consult relevant people or bodies in contravention of defined Council policies or procedures
<input checked="" type="checkbox"/>	The decision has or will demonstrate a significant adverse public reaction
<input type="checkbox"/>	The decision gives rise to significant legal, financial or propriety issues

Please explain how the relevant criteria above are met by this call-in:

Numerous residents have raised concerns over the consultation for the local plan, these include:

1. Late adoption of paper-based submissions, resulting in a reduced window of opportunity for residents who struggle with access, or literacy with online methods.
2. Lack of in-person consultation events in certain ward areas (Bradwell) despite requests from local councillors. Limiting residents' ability to access information or clarifications on the plan.

Both reasons above support the argument that the consultation has failed to reach certain groups of residents who lack appropriate IT facilities, or literacy to engage with online consultation processes. This group of residents are often isolated, and struggle to travel to other in person events.

We believe that the consultation conducted has prejudiced against this group of residents, therefore is contradictory to council policy in ensuring all residents have viable opportunity to access and engage with consultation. We would argue that this has contributed to the significantly low (289 people) response to the consultation.

**Suggested proposal you would like to be voted on at the call-in meeting
(this should be an evidence-based proposal and you should provide evidence to support the proposal)**

Re-opening of the consultation period, with an accompanying programme of in-person consultation events across those areas of the borough previously excluded; including the ability for residents to respond to the consultation via paper-based responses at the events.

Members requesting call-in of the decision:

	Name	Signature	Date
1.	Cllr Dave Jones	Please see email to Chief Exec	21/7/22
2.	Cllr Sue Moffat	Please see email to Chief Exec	21/7/22
3.	Cllr Andrew Fox-Hewitt	Please see email to Chief Exec	21/7/22
4.	Cllr Richard Gorton	Please see email to Chief Exec	21/7/22
5.	Cllr Steph Talbot	Please see email to Chief Exec	21/7/22
6.	Cllr Joel Edgington-Plunket	Please see email to Chief Exec	21/7/22

THIS PART OF THE FORM IS TO BE COMPLETED BY THE CHIEF EXECUTIVE OR HIS/HER REPRESENTATIVE

Date and time form received:	
Form processed by (name):	

Date of publication of decision:	
Was the call-in request received within 7 working days of publication?	YES/NO If no reject and inform relevant parties
Are there at least 5 appropriate Members' signatures on the call-in notice?	YES/NO If no reject and inform relevant parties
Which Overview and Scrutiny Committee will this call-in be referred to?	

Signature of Chair / Vice-Chair of relevant Overview and Scrutiny Committee		Date:
--	--	--------------

The appropriate decision making body, Members requesting call-in, the Monitoring Officer, the Licensing and Democratic Services Manager and the Scrutiny Officer need to be informed of receipt of call-in form.

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NEWCASTLE-UNDER-LYME BOROUGH COUNCIL

**EXECUTIVE MANAGEMENT TEAM'S
REPORT TO CABINET**

19 July 2022

Report Title: Local Plan Issues & Strategic Options – Consultation Feedback

Submitted by: Executive Director Commercial Development & Economic Growth

Portfolios: Strategic Planning

Ward(s) affected: All

Purpose of the Report

To provide feedback on the Newcastle-under-Lyme Local Plan Issues & Strategic Options consultation.

Recommendation

That Cabinet:-

1. notes the feedback on the Newcastle under Lyme Local Plan Issues & Strategic Options consultation
2. notes the feedback received from the Economy and Place Scrutiny Committee

Reasons

To comply with the legal and procedural requirements necessary to complete the preparation and adoption of a Local Plan for Newcastle-under-Lyme, in line with the National Planning Policy Framework (NPPF).

1. **Background**

- 1.1. Local Plans are a statutory requirement under the Planning and Compulsory Purchase Act 2004, requiring Local Authorities to set out a local development plan for their area.
- 1.2. The Council currently has a Local Plan in place that was adopted in 2003. This is supported by the Newcastle-under-Lyme and Stoke-on-Trent Core Spatial Strategy, which was adopted in 2009. Both of these documents were in place prior to the National Planning Policy Framework (NPPF) being issued in 2012. Depending on their conformity with the NPPF, the local policies in our plans now have varying degrees of weight that can be applied in planning decision making.
- 1.3. Work was previously undertaken to deliver a new Joint Local Plan (JLP) with Stoke. Due to an increasing desire to provide a plan more focused on the needs of the Borough, and in particular, the role of Neighbourhood Planning, the Council agreed to separate from the Joint Local Plan arrangements in January 2021 and commence work on a Borough Local Plan.
- 1.4. The new Local Plan sets the vision and framework for how Newcastle-under-Lyme will grow up to 2040. It sets out targets for the number of homes and jobs to be delivered in the Borough and a spatial strategy to guide development and infrastructure to the most sustainable locations.

- 1.5. Once adopted it will provide a strategic approach to the delivery of a range of development types including market and affordable housing, employment, and supporting hard and soft infrastructure. Such development requirements will be balanced against the need to protect the built and natural environment, whilst also furthering the Council's response to the climate emergency declaration.
- 1.6. Having an up to date local planning policy framework that reflects national policy will be more robust in determining planning applications and defending planning appeals. An up to date plan also gives more certainty to the development industry and local community on where development is likely to be supported.
- 1.7. A key element to the preparation of the Local Plan is the Council's approach to consulting and engaging the community. The Local Plan goes through a number of stages of preparation and it is important to clearly set out how and when people can be involved in the process. Significant consultation will be undertaken throughout all stages of preparing and producing the Local Plan. In undertaking consultation, the Council must comply with its adopted Statement of Community Involvement (SCI).
- 1.8. The Council's communications team was involved from the outset of the consultation process, as were officers with experience of consultation undertaken in other authorities, and previously when the Joint Local Plan with Stoke on Trent was being prepared.
- 1.9. The current Issues and Strategic Options version of the local plan forms part of the Regulation 18, issues consultation. This stage does not commit the Council to allocate land for development or include detailed land use policy wording. Rather its purpose is to highlight, and consult on, the planning issues across Newcastle under Lyme that need addressing and offer options to address the issues identified.
- 1.10. The Council has considered all responses received as part of the Issues and Strategic Options consultation process and will take them into account when preparing the Publication Draft Local Plan. The Publication Draft Local Plan will set out the details of aspects including how the Council proposes to meet the Borough's development needs and site allocations.
- 1.11. The consultation on the Issues & Strategic Options was also accompanied by a 'Call for Sites', inviting landowners and the development industry to submit potential development sites for assessment. A continued, proactive approach by the Council will further seek to identify opportunities for development, prioritising Brownfield sites.
- 1.12. Further evidence will be completed to support the preparation of the next stage of the Local Plan and discussions continue with our duty to cooperate partners to meet our legal obligations.
- 1.13. Following on from the now completed Issues & Strategic Options stage, there are also two further proposed rounds of consultation included within the project plan for the Local Plan, so by the end of the process the public will have had 3 distinct formal opportunities to engage with the plan and provide comments to the Council to express their views and ideas.
- 1.14. Economy & Place Scrutiny Committee considered this report and the Issues & Strategic Options consultation feedback at its meeting of 15 June 2022. No recommendations were made.

2. **Issues**

Consultation Process

- 2.1 Consultation on the Issues & Strategic Options took place between Monday 1st November 2021 and Monday 24 January 2022. This exceeded the statutory minimum both in duration, but also the mechanisms employed to engage. Given the public health situation at the time,

many Councils chose not to hold face to face events due to the additional burden of ensuring venues and interactions were Covid secure. However in NuLBC significant efforts were made by Officers to ensure that there was the opportunity for face to face dialogue which was considered to be integral to the overall consultation process.

2.2 The following paragraphs outline the organisations and other bodies that the Council is required to consult and involve in preparing our planning documents, in accordance with The Town and Country Planning (Local Planning) (England) Regulations 2012.

Specific & Duty to Cooperate:

- Stoke-on-Trent City Council
- Cheshire East Council
- Shropshire Council
- Stafford District Council
- Staffordshire Moorlands District Council
- Staffordshire County Council
- Historic England
- National Highways
- Environment Agency
- Natural England
- Coal Authority
- United Utilities
- Staffordshire Police

General:

2.3 Voluntary bodies whose activities benefit any part of the borough; bodies that represent the interests of different racial, ethnic, national or LGBTQ+ groups in the borough; bodies that represent the interests of different religious groups in the borough; bodies that represent the interests of disabled persons in the borough; bodies that represent the interests of businesses in the borough.

Additional Groups & Bodies:

2.4 In addition to the above groups, a wide range of other interest groups and organisations, developers and consultants, as well as local residents and businesses were involved and consult.

2.5 In addition, the following methods of publicity and engagement were used:-

2.6 Press release:

Published 26 October 2021 in the Sentinel. A copy of this can be found on the Council's website:-

<https://www.newcastle-staffs.gov.uk/news/article/14/council-launches-consultation-on-new-borough-local-plan>

Consultation events:

2.7 Having notified local residents, agents, stakeholders and the consultation bodies about the consultation period, the Council provided a number of drop-in sessions and appointments where interested parties could find out more about the Local Plan Issues and Strategic Options document and how to make comments on it.

2.8 A total 13 events (10 in-person & 3 virtual) were held across the borough:

- Newcastle Town Centre Guildhall, Tuesday 2nd November 2021
- Kidsgrove Town Hall, Wednesday 3rd November 2021
- Silverdale Library, Thursday 4th November 2021
- Chesterton Holy Trinity Church Hall, Tuesday 9th November 2021
- Loggerheads Oddfellow's Hall, Wednesday 10th November 2021
- The Madeley Centre, Monday 15th November 2021
- Audley Methodist Church, Wednesday 24th November 2021
- Virtual Consultation (Zoom or telephone), Wednesday 17th November 2021
- Virtual Consultation (Zoom or telephone), Tuesday 30th November 2021
- Newcastle-under-Lyme Borough Council Offices, Thursday 2nd December 2021
- Audley Methodist Church, Tuesday 11th January 2022
- Virtual Consultation (Zoom or telephone), Wednesday 12th January 2022
- Keele Village Hall, Thursday 13th January 2022

2.9 Officers from the Planning Policy team were available at these locations to assist members of the public to find out more about the Local Plan Issues and Strategic Options document, to answer questions and to provide advice on how to use the Consultation Portal to submit their comments.

2.10 In addition, presentations (via Zoom) were provided to two Parish Councils following direct requests. These took place on 11 November 2021 for Audley Parish Council & 1 December 2021 for Madeley Parish Council.

Social Media:

2.11 The Council used social media to advertise information about the Issues and Strategic Options document and to present information on the consultation events listed above. Social media posts were made on Facebook and Twitter.

Availability of the document:

2.12 The Issues and Options document was available online at:

<https://consult.newcastle-staffs.gov.uk/kse>

2.13 The Sustainability Appraisal Scoping Report and the Equality Impact Assessment were also available to view by using the above link.

2.14 The evidence base for the Local Plan was available to view at:

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

Hard Copies:

2.15 Hard copies of the Issues and Strategic Options document were made available, along with information posters, at all libraries across the borough. These were:

- Clayton Library
- Newcastle Library
- Silverdale Library
- Talke Library
- Kidsgrove Library
- Knutton Library
- Audley Library
- Loggerheads Library

2.16 The document could also be downloaded and printed from the consultation portal.

Response to Consultation

- 2.17 A total of 289 people made comments on the Issues and Strategic Options document by using the consultation portal. All comments which were sent to the Borough Council by post, which did not form part of the petitions referenced below, were scanned and uploaded to the consultation portal. In aggregate, recognising that many individuals provided multiple comments, a total of 3649 representations were incorporated within the consultation portal. Each of these comments were given individual, tailored responses by Planning Policy Officers for the consultees to be able to view once published.
- 2.18 Two petitions were submitted to the Borough Council; one containing 294 signatures, with the other containing 1376 signatures. Both of these petitions were in response to Question 18 of the Issues and Strategic Options document; *“should site AB2 – Land south east of Junction 16 be considered for Green Belt release?”* These petitions were scanned and uploaded to the consultation portal.
- 2.19 A further 757 identical letters with regard to the same issue were submitted to the Borough Council in response to the consultation. This has also been treated as a petition and all details of the consultees who submitted this letter have been collated into a spreadsheet and uploaded to the consultation portal.
- 2.20 All consultees have been added to our consultation database and will receive updates as we move towards the next and future stages of the plan making process.
- 2.21 The petitions & letters combined with the representations made via the consultation portal give a total of 6076 comments made on the Newcastle-under-Lyme Local Plan Issues and Strategic Options Consultation.
- 2.22 It is important to recognise that to allow for the expedient use of resources and the efficient progression of the Local Plan, the intention for subsequent rounds of consultation is to produce a summary of issues raised & the Council’s stance on a topic by topic basis, as opposed to responding directly to every representation.

Summary of Issues Raised in Response to the Consultation

2.23 The Summary table below presents summary of the key issues raised in response to each Section of the Issues & Strategic Options consultation document. A more detailed overview, including a quantitative breakdown of responses, where appropriate, is included as Appendix A attached to this report.

Key issues:

2.24 The following recurring themes were present in responses received to the consultation:

- Utilise brownfield opportunities
- Loss of green belt
- Impact on existing communities/settlements
- Infrastructure capacity
- Engagement with adjacent Local Authorities
- Climate Change
- Value of recreational & open spaces
- Alignment with Neighbourhood Plans

Section	Key Issues
Vision & Strategic Objectives (Q's 1-2)	<ul style="list-style-type: none"> ○ The Vision & Strategic Objectives do not align ○ Need to be more ambitious - considered in some cases to be too insular, too limited, parochial, lacking imagination & generic ○ Include a Vision Statement for individual settlements ○ Emphasis should be on environmental protection & climate change adaptation ○ Strategic Objectives contradict each other - climate change, environment & development ambitions ○ Lack of clarity in terminology e.g. aspirational housing, re-imagination of town centres, enabling balanced growth ○ Include a Strategic Objective on Historic Environment
Housing & Employment Need (Q3)	<ul style="list-style-type: none"> ○ The impact of Covid needs to be factored in ○ Take full account of 2021 Census ○ Justification for satisfying regional employment need ○ Past shortfalls in housing delivery should be addressed
Options for Growth (Q4)	<ul style="list-style-type: none"> ○ Majority support for option 1 – national minimum, standard methodology target ○ Representatives of landowners or the development industry agreed with the justification in the housing and economic needs assessment for targets above the standard methodology and put forward detailed reasons for support, for example to address past under delivery, to support economic growth, in line with modelling ○ Should focus more on town centre regeneration, housing mix not number, and the type of employment development needed ○ Bring empty homes back into use
Hierarchy of centres (Q5)	<ul style="list-style-type: none"> ○ Many respondents supported the hierarchy in principle ○ Concern over the link between position in the hierarchy and link to the level of development that could come forward ○ The hierarchy does not reflect proposals in the plan which focus on large scale rural development
Spatial Strategy (Q's 6 – 11)	<ul style="list-style-type: none"> ○ Examine all derelict land, vacant and commercial premises, brownfield land and surplus employment which could be converted to residential, empty homes ○ Protection of green belt, greenspace, agricultural land ○ Evidence and unique factors to each settlement including local need, history, infrastructure capacity, and character should be considered rather than an even distribution across the rural areas ○ There were several consultees that did not support any of the growth directions owing to perceived brownfield land availability, green belt loss impacting on rural character & countryside and infrastructure concerns ○ A greater proportion supported either growth directions 1, 2 and 6. Reasons for which include that it encourages a more even distribution of growth across the Borough and that Keele already has existing development and infrastructure in place to accommodate growth. ○ Growth directions 3, 4 and 5 were less favoured in comparison to the others ○ Proportionately, disagreement was evenly spread between the individual growth directions ○ Growth direction 1 would result in increasing car journeys which would then increase traffic, congestion and pollution ○ Growth direction 2 would result in the merging of Keele and Silverdale, losing their individual identities and undermining the function of the Green Belt ○ Growth direction 3 would bring the settlements of Talke, Chesterton and Audley closer together, which would diminish their individual character and identity

	<ul style="list-style-type: none"> ○ Growth direction 4 would lead to urban sprawl and the merging of Kidsgrove, Harseahead, Mow Cop and Stoke (i.e. Goldenhill) to the north-east, and Kidsgrove and Alsager to the north-west ○ There was concern about the cumulative impact of housing and employment development at Audley under growth direction 5. ○ Many of the alternative options suggested were made up of components already forming parts of the existing six growth directions. Other suggestions moved away from housing and employment growth entirely
Gypsy & Travellers (Q's 12 – 13)	<ul style="list-style-type: none"> ○ Very few site suggestions were put forward. Walleys Quarry, extension to the existing site at Cemetery Road was the most popular suggestion. The former municipal golf course at Keele and a couple of further observations of potential sites were put forward but there were no formal site submissions or sites put forward by landowners. ○ Many suggested talking to the Gypsy and Traveller community to identify sites including for transit provision
Other housing need (Q's 14 – 16)	<ul style="list-style-type: none"> ○ Broad consensus was that affordable housing levels should look to exceed the 10% figure ○ Viability & site specific circumstances could also be significant ○ Some considered first homes should be prioritised ○ Explore a tiered system based on varying land values across the Borough ○ Older people's accommodation should be located with good access to services and facilities ○ Consult those with other needs ○ Support a range of models of housing for elderly care, integrate with other housing and support people to stay in their own homes.
Strategic Employment Sites (Q's 17-19)	<ul style="list-style-type: none"> ○ Significant focus on the proposals at Junction 16, M6 in so far as they could impact on Audley and the surrounding localities ○ Development would result in the loss of agricultural land, recreational value and biodiversity (habitats and species). Furthermore, development would have a negative impact on the rural and landscape character of Audley ○ Existing employment development already located at Crewe and Alsager (i.e. Radway Green). The abundance of employment development will have cumulative impacts. ○ Rather than a single large site, the focus should be on a series of smaller sites potentially tied in with existing employment areas/more central locations ○ Focus should be on higher value industries ○ The Local Plan does not set out a clear rationale for a new strategic employment site and more cooperation is needed with the adjoining boroughs. ○ The Local Plan evidence base does not reflect the post-Covid economic environment ○ Staffordshire County Council highlight that Keele Science & Innovation Park remains one of their flagship employment sites and supports plans for its continued development. They also support the notion of the development of a site at M6 J16
Development boundaries (Q's 20 – 21)	<ul style="list-style-type: none"> ○ Majority considered that development boundaries should be reviewed with most supporting this to be undertaken through Neighbourhood Development Plans
Retail/town centre regeneration (Q's 22 – 24)	<ul style="list-style-type: none"> ○ Key themes emerging were shopping including a greater diversity of retail offer, competition posed by sources such as online retail and out-of-town retail parks, parking, issues related to feeling safe and residential accommodation

	<ul style="list-style-type: none"> ○ The general consensus was that it is futile to challenge these rivals to high-street shopping directly but rather an alternative needs to be presented by the high-street which online and out of town retail cannot provide ○ The kinds of shops some respondents said they would like to see include, bars, restaurants and eateries, coffee shops, book shops, craft shops, convenience stores, post offices, doctors, and dentists ○ The plan should prioritise the viability of existing retail centres. Providing a healthier balance of retailers, and improvements to the appearance of existing shop fronts, by encouraging market stalls, and offering business rates that are attractive to independent retailers. ○ Of those that responded, just over half the respondents had no opinion on changes to town centre boundaries ○ There were very few detailed comments on the boundaries overall ○ Some sought specific expansions; in Newcastle to expand the centre beyond the ring road and in Kidsgrove to incorporate the railway for regeneration purposes.
Pollution, water & environmental quality (Q's 25 -27)	<ul style="list-style-type: none"> ○ A strong majority indicated a policy on air pollution is required for the Local Plan ○ Walley's Quarry was a recurring theme ○ The Local Plan and relevant policies are expected to address the impacts of air quality on people and the environment
Development Management Policies (Q's 28-35)	<ul style="list-style-type: none"> ○ Strong majority in supports for inclusion of DM policies re: water & environmental quality including explicit reference to biodiversity net gain. Green infrastructure, flood risk, open space provision, enhanced active travel (walking, cycling) opportunities, renewable energy & sustainable urban drainage systems were also considered significant ○ Support was received for the principle of design codes to provide certainty to the development industry about design quality but also to improve the sustainability credentials of development ○ A number of sustainable construction standards were referenced and suggested that these should be required in new development such as BREEAM and Passivhaus ○ Staffordshire County Council strongly advises that a local policy on heritage is required. It advises that an up-to-date historic environment evidence base is needed ○ The key evidence should include the Newcastle-under-Lyme Borough Integrated Transport Strategy. New development should be located and designed to limit journeys by car. ○ Zero carbon targets should take account of Government ambitions and viability ○ Health was considered significant in terms of other issues to consider
Any other matters (Q36)	<ul style="list-style-type: none"> ○ There were a large number of individual letters which did not relate to any specific question but had general comments on the content of the plan ○ Points raised included concern that the plan will have a negative impact on climate change, population and statistical issues, potential green belt loss, infrastructure issues ○ Consultation & the structure/useability of the document were common themes

3. **Proposal**

- 5.1 That Cabinet notes the feedback on the Newcastle under Lyme Local Plan Issues & Strategic Options consultation.

4. **Reasons for Proposed Solution**

- 4.1 Consultation is a vital part of the preparation of the Local Plan. The Council needs to demonstrate how it has considered the representations and that the consultation was in conformity with its Statement of Community Involvement.
- 4.2 Consultation ensures local engagement and input to reflect local circumstances and ambitions for the Borough and this is taken further through collaboration with our partners and statutory undertakers. In this way, as the Local Plan evolves, the number and nature of representations to the Local Plan should be more focused and the later versions of the Local Plan should be more robust and justified. In turn, this will help focus a Local Plan examination and potentially reduce the number of hearing sessions and consequently reduce the time and cost of the examination in public.

5. **Options Considered**

- 5.1 The Local Plan Issues and Strategic Options included a range of land use issues and planning policy options that may exist to address them. An alternative option available to the report recommendation would be to request a multi-stage approach to consultation. This would result in a delay to the plan-making process and a risk of entering a repeating consultation loop, leading to a continued reliance on existing, dated local plans and policies. This would increase the risk of unplanned development and planning by way of planning appeal decisions. It could also result in the risk of intervention referenced in the third option referenced below. Alternatively, a fully drafted local plan could be published under Regulation 19 and submitted without further Issues and Options consultation, however this is not recommended as it will not enable feedback from the community to inform the policy approach.
- 5.2 A third option of not proceeding with the production of the Local Plan and cease work is not considered viable as it would directly conflict with the Government requirement for all Local Planning Authorities to have reached, or made good progress towards, having a Local Plan in place by the end of 2023. This option raises the risk of potential for Government intervention in the Council's Plan making process.

6. **Legal and Statutory Implications**

- 6.1 The Issues and Strategic Options consultation was undertaken in accordance with Regulation 18 of the Town and Country Planning Regulations (Local Planning) 2012. The production of a Local Plan has to comply various legislation including Strategic Environmental Assessment and Habitats Regulation Assessment provisions as well as having regard to a range of relevant government policy and guidance.

7. **Equality Impact Assessment**

- 7.1 An Equality Impact Assessment (EqIA) has been undertaken for the Issues and Strategic Options document. At this stage of plan preparation, it is considered there are no specific detrimental equality impacts arising as a result of this report. The EqIA has been published alongside the main report.
- 7.2 The EqIA has assessed how the Issues and Strategic Options document and the questions raised within it impact on the nine protected characteristics identified in the Equalities Act 2010.
- 7.3 It is anticipated that the Plan will bring about a number of positive impacts. These include securing a range of housing types, increased open space provision, improved health care provision and safer environments. These gains will be of benefit to people with disabilities and of different ages or those who are pregnant. People from different ethnic or racial

groups and those who experience hostility and are threatened in the environment for their sexuality or sexual orientation will also benefit from policies in the Plan.

7.4 When the Plan moves on to its next stage and sites are proposed and specific policies put forward which may affect individuals and groups, an Equality Impact Assessment will be carried out on the recommendations.

8. **Financial and Resource Implications**

8.1 There are no final implication as the costs of the public consultation exercise were provided for within set aside budgets and costs of making the consultation fully accessible (events and paper copies at libraries etc) were covered through this budget.

9. **Major Risks**

9.1 Failure to demonstrate transparency and inclusiveness in our engagement and consultation with stakeholders on strategy development.

9.2 If an aggrieved party e.g. a developer who's site hasn't be allocated or a resident group who are facing a major allocation near their houses feels the process has not been clear or biased to a certain site either through under or over promoting it may launch a challenge to the validity of the plan through the judicial review process.

9.3 Whilst these risks could result in either the plan being found unsound, delays through legal challenge or work proceeding too slowly such that more decisions on applications are made without the benefit of a local policy framework, it is felt appropriate mitigation is in place to reduce the possibility of these events occurring and in the unlikely event they do, any harm is minimised.

10. **UN Sustainable Development Goals**

10.1 As the Local Plan is primarily focused on the use of land and properties and how these relate to people's use of the environment a number of the UN Sustainable Development Goals will overlap with the aims of the Plan.

10.2 At this stage and as the draft plan is worked up, the following goals will be taken into account:



11. **Key Decision Information**

11.1 This is not a key decision.

12. **Earlier Cabinet/Committee Resolutions**

12.1 Cabinet - Wednesday, 9th December, 2020. Cabinet resolved to undertake a review on the viability of commencing work on a Borough Local Plan and ceasing work on the Joint Local Plan.

<https://moderngov.newcastlestaffs.gov.uk/ieListDocuments.aspx?CId=118&MId=3422&Ver=4>

12.2 Cabinet - Wednesday, 13th January, 2021. Following completion of the review agreed at the previous meeting, Cabinet resolved to cease work on the Joint Local Plan and commence work on the Borough Local Plan.

<https://moderngov.newcastlestaffs.gov.uk/ieListDocuments.aspx?CId=118&MId=3423&Ver=4>

12.3 Planning Committee - Tuesday, 31st August, 2021. Presentation of draft Issues and Strategic Options Paper to Planning Committee for consideration and for opportunity to pass comment on the plan to Cabinet

<https://moderngov.newcastlestaffs.gov.uk/ieListDocuments.aspx?CId=119&MId=3819&Ver=4>

12.4 Cabinet – Wednesday, 8th September 2021. Cabinet resolved that public consultation be approved on the draft Issues and Strategic Options Paper and the publication of the accompanying Sustainability Appraisal Scoping Report. It also resolved that a report be submitted to a future meeting summarising the findings of the consultation event.

<https://moderngov.newcastle-staffs.gov.uk/ieListDocuments.aspx?CId=118&MId=3429>

13. **List of Appendices**

13.1 Appendix A: Summary of responses to the Local Plan Issues & Strategic Options Consultation

14. **Background Papers**

14.1 Contact Author

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Question 1 Do you agree with the Vision for the Borough? If not, how could the Vision be improved?

- Considered by some including CPRE & developers to be too insular, too limited, parochial, lacking imagination
- The Local Plan does not seem to follow the Vision – does not set high enough targets for the Borough to achieve
- Place more emphasis on living in town centres
- Should contain Vision Statements for individual settlements
- Improving/maintaining existing roads & improving network of community transport e.g. mini metro using 'old' railway links
- Green Belt should not be seen as an opportunity nor should any development be to its detriment/loss
- More emphasis on walking & cycling (public transport/active travel in general)
- Climate change must be at the heart of the Vision, with environment the main focus, with the assertion that we cannot build out of climate catastrophe
- Remove the word 'endeavour' in creating more sustainable places to demonstrate how serious the Local Authority is
- Should include desire to protect wild & green spaces
- The term 'jobs' should be defined – variety of skilled jobs?
- Does not reflect the economic reality & changed public health circumstances post Covid

Question 2 Do you agree with the Strategic Objectives? If not, how could these be improved?

- Poorly drafted & contains weakened commitments, not specific enough, too generic
- Alignment to Vision is not absolute
- Include a Strategic Objective on historic environment
- Emphasis on brownfield sites & town centre development is not strong enough
- Lack of clarity in terminology e.g. aspirational housing, re-imagination of town centres, enabling balanced growth etc
- Terms such as where possible, subject to viability & deliverability should be removed, although some parties thought there were valuable
- Objectives contradict each other - climate change, environment & development ambitions
- Confusion as to whether the Strategic Objectives are in priority order
- Development on Green Belt concerns were a very common theme
- Lack of understanding re: what constitutes Exceptional Circumstances
- Distribution & Logistics should not form part of the sectors for growth
- Audley & Keele numerous site specific concerns including Strategic Employment & the Golf Course
- Relationship to Neighbourhood Planning
- Infrastructure capacity & environmental damage concerns
- Desire for preservation of all green spaces

Question 3 Do you have specific comments to make with regard to this chapter [housing and economy]?

- Challenges to population statistics, stagnated employment and impact of the pandemic which results in suggestions that no new housing is required
- Should only utilise brownfield sites and sites in the town centre/regeneration sites for new housing, and not Green Belt or green field land
- Calculations should be refreshed in light of the 2021 census and to reflect the impact of the pandemic
- Opposition to development on Green Belt land and at J16 and in Audley Parish
- No need for new warehouses when the calculations show we have surplus employment land. Some suggestions that this surplus should be used for housing. Some suggestions that warehousing will only provide low skilled jobs.
- Concern over the impact of housing on infrastructure, particularly the transport network
- Government targets are overestimates and should be challenged in line with a clause in the NPPF
- Some scepticism over the findings of the housing and economic needs assessment, particularly the case for higher growth scenarios
- Suggestions that the chapter could have been written more clearly, or that there were issues with the interpretation of data
- Some support for new home building to reflect the findings of the housing need assessment and to address past under delivery. Support also for maintaining a 5 year supply of housing

Question 4 Which option for growth is the most appropriate to use in the Local Plan?

- Majority support for option 1 – national minimum, standard methodology target. This option was considered to have a lesser impact on infrastructure and was more in line with past delivery
- A large number of respondents disagreed with any housing growth, some suggested challenging the government target on the basis of brexit, the pandemic, population, stagnant employment, the 2021 census or they disagreed with the need.
- Once all brownfield sites were developed there was no need for further development.
- Some suggested growth is at odds with mitigating against climate change.
- Some suggested higher growth scenarios were deliberate to justify Green Belt release
- Safeguard Green Belt land and build in town centres and brownfield first
- Some respondents, mainly representatives of landowners or the development industry agreed with the justification in the housing and economic needs assessment for targets above the standard methodology and put forward detailed reasons for support, for example to address past under delivery, to support economic growth, in line with modelling.
- Should focus more on town centre regeneration, housing mix not number, and the type of employment development needed
- Bring empty homes back into use

Question 5 Do you agree with the proposed hierarchy of centres? If answering no, why?

- Generally even response – slightly more than half the respondent's that answered the quantitative question do support the hierarchy
- Many respondents supported the hierarchy in principle but had one or two main points of disagreement which meant they couldn't overall mark support for the hierarchy – essentially a yes and no answer.
- The hierarchy does not reflect proposals in the plan which focus on large scale rural development.
- Prioritise development in urban centres, particularly town centres, protect the Green Belt and villages.
- Some disagreement with the District Centres identified and concern over further development of these.
- Some disagreement or issues associated with Baldwin's Gate and Betley and Wrinehills proposed classification of a rural centre from those Parish Council's and some other respondents.
- Concern over the link between position in the hierarchy and link to the level of development that could come forward. Some suggested infrastructure and capacity had not been given sufficient consideration
- Thistleberry missed from list of centres

Question 6 Do you have suggestions for new development sites within development boundaries? Please see the evidence base & topic papers webpages (link below) for maps of all existing development boundaries. <https://www.newcastle-staffs.gov.uk/all-services/planning/planning-policy>

- Some site suggestions were put forward for consideration either land/sites that had been observed or sites being promoted through the Local Plan process. Not all respondents were clear on whether the sites were in the development boundary or provided information about the ownership of land
- Many non-specific site suggestions were put forward seeking for the Council to examine all derelict land, vacant and commercial premises, brownfield land and surplus employment which could be converted to residential, empty homes
- The majority of comments objected to consideration of release of Green Belt land
- Some comments acknowledged the position that there is limited land supply remaining for development in the urban area
- General agreement with the process of exhausting land in development boundaries before consideration of other sources of sites
- suggestion that the land supply from within the existing urban area should be properly scrutinised through the Local Plan process to ensure that sites relied upon within the supply will come forward during the plan period, and that sufficient flexibility is built into the supply to deal with any potential non-delivery.
- Some criticism of the difficulty in viewing the current development boundary maps

Question 7 Are there any areas in Newcastle-under-Lyme, Kidsgrove and within the development boundaries of Rural Service Centres that should be protected from development?

- Some specific spaces were highlighted, mostly areas of nature reserves, open space or recreational land.
- Many highlighted the need to protect open space within built up areas and spaces such as conservation areas, locally designated green spaces, schools playing fields, allotments and recreation grounds
- Many highlighted land in the Green Belt to protect including specific suggestions including the former municipal golf course at Keele and land around Audley Parish
- Some mentioned agricultural land including specific landholdings
- Consider brownfield first
- The benefits of protecting green spaces were often highlighted to health, wellbeing, nature and climate change
- Existing boundaries should be protected and only allow development in line with Neighbourhood Development Plans
- Issues associated with loss of green space were highlighted including pressure on infrastructure and climate change

Question 8 Which option/s for expansion do you support?

- There were several consultees that did not support any of the growth directions. The reasons are as follows:
- There is a belief that brownfield sites are available in non-Green Belt locations to accommodate growth. Development should be in accordance with the Hierarchy of Centres, focusing on non-Green Belt locations within Urban Centres, Rural Centres, Neighbourhood Centres and Villages.
- There was concern Green Belt release would negatively impact the rural character and countryside. Furthermore, the rural area does not have the road / highway infrastructure to accommodate growth. Existing services and facilities are already constrained with capacity issues.

- A greater proportion supported either growth directions 1, 2 and 6. The reasons are stated below:
- Growth Directions 1 and 6 encourage development of brownfield sites, and within defined centres in accordance with the hierarchy. Suggested development opportunities exist at Ryecroft, Roebuck Centre, Mid Way and numerous units above retail shops within the town Centre.
- Growth directions 1 and 6 encourages a more even distribution of growth across the Borough, and impacts of development would be minimized in comparison to larger and fewer sites at a specific location. This approach would help to maintain a housing supply in the medium and long term.
- The countryside and agricultural land should be protected.
- Some considered growth direction 2 as a suitable option because Keele has existing development and infrastructure to accommodate future growth (i.e. university, employment, and transport connections to Newcastle Town Centre).
- An urban extension at Keele would attract workers at the university and Science and Business Park to live within the area. This would encourage more sustainable modes of transport and less vehicle usage. Furthermore, development would support the growth of the University.
- An extension at Keele would provide the opportunity to deliver affordable housing.

- Growth directions 3, 4 and 5 were less favoured in comparison to the others. However, some supporting comments were made:
- Growth direction 3 was considered suitable because Talke and Chesterton has existing infrastructure (retail, employment provision, transport connections) to accommodate growth. The proximity of housing and employment would encourage sustainable modes of transport and less vehicle usage.
- Growth direction 3 provides opportunities to enhance access and extend public transport routes between proposed development, Newcastle and Kidsgrove Town Centre, and Kidsgrove Railway Station.
- Growth Direction 4 was considered suitable as Kidsgrove has existing infrastructure, services and facilities (i.e. shops, schools, community centres etc). This growth option provides the opportunity to expand and upgrade Kidsgrove Railway Station, and to enhance transport connections associated with it.
- Growth at Kidsgrove would support neighbouring rural settlements such as Mow Cop.
- There are development opportunities at Slacken Road, Kidsgrove.
- Growth direction 5 was least supported. However, it was highlighted Audley has minimal retail and employment offer. Previous industries such as coal mining have disappeared, and opportunities in agriculture are limited. Growth at Audley would help to address this and provide greater employment opportunities.

Question 9 Which option/s for expansion do you disagree with?

- There were several consultees that disagreed with all six growth directions for the following reasons:
- Growth in the Green Belt would result in the loss of agricultural land, open / green space, biodiversity, and amenity.
- The loss of Green Belt would impact the environment's ability to mitigate climate change through carbon sequestration.
- It is believed there are plenty of development opportunities on brownfield sites (e.g. warehousing / industrial sites) in non-Green Belt locations. Empty and vacant properties should be prioritised, especially within Town Centres before considering new development.
- Development in the Green Belt would result in a greater reliance of vehicle travel, and not encourage sustainable modes of travel across the Borough. Increases in traffic, congestion and pollution would occur.

- Proportionately, disagreement was evenly spread between the individual growth directions. For each growth direction, the reasons for were as follows:
- Growth Direction 1 would result in increasing car journeys which would then increase traffic, congestion and pollution.
- Large scale rural extensions would encourage urban sprawl into rural areas across the Borough.
- Growth direction 2 would result in the merging of Keele and Silverdale, losing their individual identities and undermining the function of the Green Belt.
- Growth at Keele would impact on the historic, heritage and natural environment. Development at Keele Golf Course would impact the ability to mitigate climate change and increase carbon sequestration on Council owned sites as suggested in the AECOM report.
- Keele has already witnessed growth at the Hawthorns and Hamptons sites. The existing road / highway network cannot accommodate further growth. Parking provision is an existing problem.
- The university's growth aspirations were questioned due to the pandemic. Suggestions were made that the pandemic has altered the demand for student accommodation and housing around Keele. The lack of demand for student housing could also free up units for the housing market.
- Growth direction 2 contradicts the local plan objectives SO-II and SO-X.
- It is viewed that improvements are required to the existing road / highway network including the A500 and A34 to accommodate development at Talke and Chesterton under growth direction 3. Currently, there are limited pathways, cycleways and public transport connections across the area.
- Growth direction 3 would bring the settlements of Talke, Chesterton and Audley closer together, and would diminish their individual character and identities.
- Further development at Talke and Chesterton would place greater existing pressures on services and facilities including schools and healthcare.
- There is a variety of open and green spaces hosting an abundance of wildlife and biodiversity. Sites include Parrots Drumble Nature Reserve, Bathpool Woods and Bradwell Woods. Development would have an adverse impact on these sites.
- Growth direction 4 would lead to urban sprawl and the merging of Kidsgrove, Harseahead, Mow Cop and Stoke (i.e. Goldenhill) to the north-east, and Kidsgrove and Alsager to the north-west. This undermines the purpose of the Green Belt.
- Growth direction 5 was of particular interest with more detailed comments in comparison to others. There were concern about the cumulative impact of housing and employment development at Audley under growth direction 5.
- Growth at Audley would severely impact the open and rural character of the parish and the settlements within it. Urban sprawl would result in the merging of settlements

within Audley, thereby losing their individuality and identities. Furthermore, growth would impact on the historic (Conservation Area) and natural environment (loss of biodiversity).

- The existing road / highway network does not have the capacity to accommodate further housing and employment development. Roads within Audley are narrow and would increase traffic, congestion and pollution (air and light). Parking provision is an existing problem.
- Proposed growth would undermine Audley's status and a Rural Service Centre, and the aims and objectives of the emerging Neighbourhood Development Plan. It contradicts local plan objective SO-IV, and would not be compliant with part 2.8 of the NPPF.
- It was suggested that Audley is already a sustainable location given its status as a Rural Service Centre, and therefore growth is not required. Church Street hosts a variety of retail services (e.g. hairdressers, supermarket, restaurants, library, doctors (latter oversubscribed) etc).
- Numerous consultees expressed their disapproval for the allocation of strategic employment site (AB2) stating it was not in keeping with Audley in terms of density, type and design of development. The site is viewed as open space used for leisure and recreational purposes (i.e. walking, horse riding etc).
- Site AB2 currently has no public transport connections (e.g. bus travel), and the surrounding road / highway infrastructure is not HGV compatible.
- It is perceived that jobs created will be low skilled and low paid, and would not benefit the residents of Newcastle-under-Lyme due to the site's location bordering Cheshire East. Neighbouring employment developments in Crewe and Alsager (e.g. Radway Green) was often highlighted as a reason to not allocate site AB2.

Question 10 Are there any alternative options which require consideration?

- Many of the alternative options suggested were made up of components already forming parts of the existing six growth directions. Other suggestions moved away from housing and employment growth entirely. The following suggestions were made:
- No Green Belt release at all, and to build in non-Green Belt locations and on brownfield sites. Development should be considered on surplus commercial and industrial land. Redevelopment opportunities at Ryecroft and Roebuck Centre are examples. Refurbishment of empty, derelict and abandoned building (i.e. retail units and residential properties) should be considered. Bring back the 1000+ empty properties into use within the Borough.
- Development should be focused in accordance with the Hierarchy of Centres, with the Urban Centres (Newcastle and Kidsgrove) being the first point of call, followed by the District Centres, Neighbourhood Centres and then villages. Priority should be made to improve the health of the town centres. Reduce business rates and rents and ensure completion of unfinished developments (e.g. Nelson roundabout – Sky Building) before building elsewhere.
- Equal amounts of growth across the Rural Service Centres and other rural settlements – Madeley, Betley, Keele, Baldwins Gate, Loggerheads and Audley. Greater dispersion of development would have less impact in comparison to a large single strategic site.
- A combination of smaller sites adjacent to existing settlements and strategic sites. This would help to maintain a housing supply within the Borough in the medium / long term. Another suggestion was strategic sites only within sustainable rural areas.
- To continue development to fulfil Policy ASP5 which seeks to address the failing housing market through focusing development in Newcastle and Kidsgrove Town Centre, Silverdale, Thistleberry, Knutton, Cross Heath, Chesterton, Clayton, Westlands, Seabridge, May Bank, Wolstanton, Porthill and Bradwell.
- Focus development along the A500 and A34 corridors. Development opportunity at land east of the A34 between High Carr and the A500.
- Optimise and uplifting the density of development within the urban area and town centres. Consider building upwards rather than outwards to use less land.
- If Green Belt was to be released, the weaker performing sites should be developed on.
- Focus on a long-term sustainable approach rather than development alone. The climate emergency and environmental protection should be the priority.
- Growth should be target where identified within Neighbourhood Development Plans.
- Fulfil the development needs and growth through Duty to Co-operate – Stafford, Stoke-onTrent, Shropshire, Cheshire East, Staffordshire Moorlands.
- Central Government should be challenged in terms of their national growth targets.

Question 11 Should development in the rural area be spread equally across the Rural Centres? If not, how should growth be distributed in the rural area?

- The majority that responded quantitatively (66%) suggested that development should not be spread equally
- A high number of respondents suggested that evidence and unique factors to each settlement including local need, history, infrastructure capacity, and character should be considered
- Development should be balanced and proportionate to reflect the character and identity of settlements
- Some mentioned planning gains should be taken into consideration which align with economies of scale in terms of housing numbers
- Comments supporting an urban first approach, protecting the rural area from over development
- Support for small scale and infill development
- Concern about impact on the rural road network and additional commuting
- For those that did support equally spreading growth this was often in the context of fairness and only after other options had been exhausted
- Should be in line with Neighbourhood Development Plans.

Question 12 Do you have suggestions for potential Gypsy & Traveller sites which are deliverable?

- Very few site suggestions were put forward. Walleys Quarry, extension to the existing site at Cemetery Road was the most popular suggestion. The former municipal golf course at Keele and a couple of further observations of potential sites were put forward but there was no formal site submissions or sites put forward by landowners.
- Many suggested talking to the Gypsy and Traveller community to identify sites
- Some supported addressing the needs of this community, some expressed concerns or suggested there was no need or the need should not be differentiated from general housing need.

Question 13 Which option should the Council use to address the need for transit provision?

- There was a limited response to this question. Of those that responded, the most supported options were for a negotiated stopping policy or a transit pitch with 3-13 pitches.
- Most responded 'other' and suggested talking to the Gypsy and Traveller community to determine what the best solution was, or suggested a mix of the options to address transit provision, as opposed to one solution.
- There were some suggestions that any transit site required defined rules, there was a suggestion that sites on Council owned land could be better controlled.
- One suggested the need was underestimated, whilst another suggested there was no need

Question 14 Should the Local Plan set an alternative target for affordable housing to the national minimum (10%)?

- Some were content with the national minimum of 10% affordable housing. However, there was greater support for setting an alternative target above the 10% requirement.
- The West Midlands Housing Association Planning Consortium provided detailed justification for a higher affordable housing target.
- Suggestions of 15% and 25% affordable housing was made. A tiered approach was also suggested starting with a minimum of 15%.
- Many discussed low income households and first time buyers cannot afford to get onto the property ladder, and this is a reason for increasing the affordable housing requirement.
- There was the view that the affordable housing target should reflect the local needs of the settlements and Borough as a whole.
- Developers should develop not just for financial gain. They should comply with the affordable housing triggers and requirements associated with new housing development.
- From a developer's perspective, the affordable housing contributions should not render development schemes unviable.

Question 15 Do you agree with the general ratio of 5% social rented, 2.5% first homes and 2.5% flexibility to make up the composition of affordable homes on qualifying sites?

- Some considered first homes should be prioritised
- Some felt the ratio for affordable housing should be higher than 10% to help people to access the housing market and to reduce poverty. Suggestions for 30% and 50% put forward.
- Suggestion for more local housing need surveys to inform policy
- Some support from the development industry for 10% affordable ratio. The level should only be based on what the market can sustain.
- Tiered system suggested based on the land value as this differs across the borough.
- Some support for models which enable eventual full private home ownership
- Some concern on the social rented element, how this will be delivered
- The West Midlands Housing Association Planning Consortium highlighted that the ratio of tenures is not compatible with national policy
- A detailed late representation was received from Aspire

Question 16 How should the Local Plan help to deliver accommodation for older and disabled people and the specific needs of other groups?

- Several observations were made that older people's accommodation should be located with good access to services and facilities. This included healthcare and retail shops.
- More evidence and community consultation required with carers and elderly required to understand housing solutions
- Help older people remain in their homes and to be independent
- Encourage private providers to develop buildings and offer high quality care
- Increase social renting
- Schemes such as extra care, retirement villages, co-housing sites, lifetime homes standards
- Encourage community led development
- Promote integration of different groups and avoid creating ghettos
- No further student accommodation is required
- Specific need and allocations for C2 uses required
- Need for larger family housing

Question 17 Do you think a strategic employment site should be allocated in the Local Plan?

- Significant focus on the proposals at Junction 16, M6 in so far as they could impact on Audley and the surrounding localities
- Extensive submission from promoters of Junction 16, M6 detailing its merits & supporting evidence
- Capacity of infrastructure would be far exceeded
- Major negative impacts on biodiversity & green belt loss
- Such proposals contradict climate change objectives & settlement hierarchy
- Rather than a single large site, the focus should be on a series of smaller sites potentially tied in with existing employment areas/more central locations
- Existing empty units should be utilised first
- Air, noise & light pollution consequences
- Enough sites need to be allocated to flexibly support employment opportunities
- Schemes within adjacent Local Authorities offer similar development types as well as alternative, more sustainable, transport methods such as rail hubs. Further expansion at Chatterley Valley also advocated.
- Focus should be on higher value industries
- Detrimental to the identity of settlements & the Parish would not directly benefit
- Extensive car borne in-commuting
- The benefits to the affected areas would be very limited/non-existent
- Such schemes should be focussed on areas of higher unemployment than within Newcastle under Lyme
- Areas should be retained for agriculture and leisure pursuits
- Enhanced graduate retention benefits potentially accrued from further development at Keele
- There remains areas undeveloped within the University that should be exploited first, with considerable capacity remaining for growth
- Hub for technological business growth at Keele seen as having value & potential
- The Local Plan does not set out a clear rationale for a new strategic employment site and more cooperation is needed with the adjoining boroughs.
- The Local Plan evidence base does not reflect the post-Covid economic environment
- Staffordshire County Council highlight that Keele Science & Innovation Park remains one of their flagship employment sites and supports plans for its continued development. They also support the notion of the development of a site at M6 J16.

Question 18 Should Site AB2 – Land south east of Junction 16 be considered for Green Belt release?

- A strong majority were not in favour of site AB2 being released from the Green Belt. The reasons are stated below:
- Existing employment development already located at Crewe and Alsager (i.e. Radway Green). The abundance of employment development will have cumulative impacts.
- Concerns were made that the existing road and highway network cannot accommodate the proposed growth for housing and employment. Roads are narrow within the settlement of Audley which would cause traffic and congestion. Local roads are not suitable for HGV traffic.
- Growth would result in increasing vehicle usage, which turn would cause greater noise and air pollution.
- Site AB2 is viewed as a valuable green space and is used for recreational purposes, i.e. walking, cycling, horse riding.
- Development would result in the loss of agricultural land and biodiversity (habitats and species). Furthermore, development would have a negative impact on the rural and landscape character of Audley.
- The development of site AB2 would contradict the Local Plan objectives SO-I, SO-II, SO-IV, SO-VI, SO-XI and SO-XIII.
- Part of the site falls within Flood Zones 2 and 3. Development would cause further flooding.
- Employment development on site is associated with lower waged and lower skilled jobs (i.e warehousing). This is not aspirational for the Local Plan.

Question 19 Should site KL15 -Land to the south and east of new development site, Keele University be considered for Green Belt release?

- Emphasis should be more on climate change than economic growth
- Presents a positive opportunity if sustainable building techniques were employed and the site was developed sensitively e.g. green roofing with full consideration of biodiversity aspects
- Flora & fauna and significant recreational value of the site is significant. Geology may also be an issue
- Opportunity to build upon the existing infrastructure owing to its proximity to the town centre & symbiosis with the higher education facility
- Serve to encourage high skilled, well-paid roles to the area and this aligns with SSLEP evidence base
- Ongoing dialogue between the University & the Local Authority should be maintained
- Full justification should be provided to establish the need for the expansion
- Absence of detail, such as Keele Masterplan not being publicly available, makes forming a view difficult. Environmental impacts also need to be fully evaluated.
- The University has ample land to the south toward Newcastle that is developed in readiness for buildings
- Infrastructure pressures for existing community which are already exacerbated by Walley's Quarry
- Flood risk concerns
- Alternative sites such as Ryecroft would present better options for expansion of the University
- Any loss of green belt should be accompanied by opportunities for improvement being maximised, with impacts minimised and mitigated as far as possible
- Will serve to coalesce Keele Village with other areas such as Seabridge & Westlands. This is challenged by the University itself who also contest that it's not a valued landscape and would involve a limited release of countryside
- Historic England have concerns as to heritage impacts
- Presence of a high voltage cable would be expensive to re-route underground
- Existing congestion problems would be exacerbated. Add to pollutant levels in Newcastle under Lyme town centre.
- The site is not of strategic scale & should not in any way be considered as an alternative to the proposals for J16, M6
- Additional sites are promoted for residential purposes that it is argued would complement the expansion of the University.
- Release of further land in the University Growth Corridor advocated for high quality and accessible new residential development, to support the attraction and retention of employees, academics and future graduates as part of a mixed sustainable settlement for the Borough.

Question 20 Do you agree with the key principles of development boundaries?

- Of those that responded, most (62%) supported the key principles of development boundaries
- Support for boundaries that prevent settlement expansion or building on green spaces and the Green Belt
- Boundary maps need to be provided as there isn't clarity on the boundaries
- Boundaries are not appropriate for every settlement – for example where a boundary would be ill defined
- Support for boundaries which protect Audley and Keele
- Some suggested boundaries need to change to reflect new allocations in the Local Plan, others did not want to see boundaries change to accommodate growth
- Some disagreed with the list of areas which should be excluded from the development boundary
- Suggestion that the term built up area boundaries is more appropriate
- Suggestion that any adjustment should be overseen by Neighbourhood Plan groups
- Make use of sites temporarily built on rather than exclude them
- Support for an alternative criteria based approach which would enable more flexibility

Question 21 Do you think the development boundaries should be reviewed? If so, through the Local Plan or through Neighbourhood Plans?

- Of those that responded, 62% considered that development boundaries should be reviewed with most supporting this to be undertaken through the Neighbourhood Development Plans
- The boundaries are not currently clear so review is welcomed
- Some supported maintaining the boundaries as they are
- For those that supported review through Neighbourhood Plans it was felt local people are better placed to draw appropriate boundaries
- For those that supported boundary review through the Local Plan, many suggested that boundary reviews had not taken place for some time and would align with new site allocations through the Local Plan. It was also said that reviewing boundaries through Neighbourhood plans could result in delays to the Local Plan
- Review of boundaries should be an open and transparent process subject to consultation
- Any boundary review should benefit local people not developers

Question 22 What would you like to see on your local high street?

- Key themes in the responses to this question were shopping, competition posed by sources such as online retail and out-of-town retail parks, parking, issues related to feeling safe and residential accommodation.
- Of 87 responses to this question, 44 respondents used the word 'shop', a smaller proportion of responses used alternative words with similar meanings such as 'retail' and 'retailer' instead. 25 responses used the word 'market'.
- Multiple respondents acknowledge changes in the average person's shopping habits, with shoppers preferring to spend their money either with online retailers, or at out-of-town retail parks, and that this is syphoning business away from the high street. The general consensus was that it is futile to challenge these rivals to high-street shopping directly but rather an alternative needs to be presented by the high-street which online and out of town retail cannot provide. 14 respondents expressed the view that Newcastle-under-Lyme should return to its roots as a market town.
- Respondents expressed that they would like to see a greater diversity of high street shops, a significant proportion stated a desire to see independent shops, specialist shops, and artisans; the word 'independent' or a misspelling of it appears some 26 times.
- In contrast to this, some other respondents stated a desire for more well-known, high-end, high-class, upmarket, boutique, or quality shops and brands, the phrases used varied so it's harder to count these, but there were fewer people asking for this than those asking independent shops.
- Several respondents note the difficulty posed in making up-market or independent high street shops sustainable, so that the people who live here can afford what is being sold, and the retailers themselves can afford rent. A reassessment of/ reduction in business rates was suggested, as was the offering of 'incentives'.
- The kinds of shops some respondents said they would like to see include, bars, restaurants and eateries, coffee shops, book shops, craft shops, convenience stores, post offices, doctors, and dentists. Out of 87 respondents, 12 said they would like to see more 'leisure.'
- 'Charity shops', 'bargain shops', or 'pound shops' are mentioned 14 times, in all but 1 of these instances they were being described as a negative aspect of local high streets as they exist currently.
- There are 11 separate respondents who were unhappy with and mentioned specifically the number of empty or derelict shops and premises.
- More than once respondent suggest that other high streets such as Leek, Congleton, Nantwich, Sandbach, and 'towns in Cheshire' should be looked to as successes, and as examples of what to do with our own high street.
- Of 87 responses, the word 'parking' is used in 12 responses. Of those 12, 3 respondents expressed wanting 'free parking. Some respondents felt that easier, and reduced or free parking would encourage shoppers to stay longer in the town
- Of 87 responses, 4 respondents desired an increase in 'police' or 'policing', 6 used the word 'safe', still others did not use these exact words but expressed concern for their safety in terms of homelessness and vagrancy, and of gatherings of teenagers with nothing to do and nowhere to go, and of anti-social behaviour. Still others expressed a simpler desire for the high street to be clean and tidy.
- 11 respondents suggested that they would like to see more dwellings alongside or above high street shops.

Question 23 What should the Local Plan do to enhance the vitality & vibrancy of the Borough's retail centres?

- Many of the same themes appeared in this question as appeared in the previous one, question 22. In brief, a majority of respondents stated that the plan should prioritise the viability of existing retail centres. Providing a healthier balance of retailers, and improvements to the appearance of existing shop fronts, by encouraging market stalls, and offering business rates that are attractive to independent retailers. Uses should be found for vacant units E.g., flea markets and pop-up shops. More dwellings should be provided around the in and around the town. Mix in housing with retail developments. More accommodation for the elderly/retired close to town. Areas above shops should be converted into accommodation if viable. Neighbouring retail centres should be looked to for inspiration and support should be given to rural areas for their own retail growth.
- Transport and access to retail centres was a new key theme. Again, respondents expressed desire for cheaper/ easier or free parking which it was felt by several respondents would increase footfall. More should be done to encourage cycling and walking, creating cycle routes, improving public transport for example by having more evening buses. A respondent suggested the introduction of 'smart crossings' to manage traffic. Further pedestrianisation of the High Street, reducing speed limits in these areas, allowing for a café culture to develop/ outside eating in the summer.
- Linked to the matter of access to the retail centres, public safety was a recurring theme; respondents wanted the council to tackle the problems of homelessness/ vagrancy, and increase visible police presence in retail centres, as well as to provide convenient pedestrian access to and through the town for people who don't wish to use the underpasses or alleyways, or at least to make them safer.
- More events should be put on which will encourage people to come to the town centre, the Council should make sure that they are publicised so that people know about them.
- Many suggestions touched upon the promotion of urban green spaces and open spaces; more should be done to maintain and enhance existing gardens, and consideration should be given to the creation of 'linear parks', creating and connecting smaller scale wildlife habitats to each other, green walls and roofs, wildflower areas, community growing spaces, more trees in streets. We should add more colour and greenery to the town.
- One respondent suggested that incentives should be offered which attract skilled and green businesses to the area. That Newcastle could become known for eco-friendly/ carbon neutral business.

Question 24 Do you agree with the recommended changes to the town centre boundaries? If you don't agree, why?

- Of those that responded, just over half the respondents had no opinion on changes to town centre boundaries
- Just over a quarter agreed with the changes
- There were very few detailed comments on the boundaries overall
- A few mentioned that the community should be consulted and should agree
- More detail on the proposals and rationale were sought by some
- Some sought specific expansions; in Newcastle to expand the centre beyond the ring road and in Kidsgrove to incorporate the railway for regeneration purposes.
- One noted there was an anomaly between the text in table 12 and the map of Newcastle boundary

Question 25 Is a Local Plan policy on air pollution required? If so, what should a policy on air pollution contain?

- A strong majority indicated a policy on air pollution is required for the Local Plan.
- Whalley's Quarry was a popular theme for this question. We should learn from the mistakes of Whalley's Quarry and ensure future air quality issues are avoided from new and existing development.
- The Local Plan and relevant policies are expected to address the impacts of air quality on people and the environment.
- It is recommended to monitor air pollutants and particulates, ensuring they do not reach thresholds above national standards from existing and new development.
- Growth in Audley was raised several times, with concerns of the cumulative impacts of housing and employment development on air quality.
- It is observed that growth would lead to increasing vehicle usage, which in turn would result in increasing traffic, congestion and air pollution. These impacts should be avoided or mitigated as a result of development.

Question 26 Is a Local Plan policy on water quality required? If so, what would it contain?

- A strong majority stipulated a policy on water quality is required for the Local Plan.
- It is observed the Issues and Strategic Options Consultation Document provided little detail about water quality and relevant issues within the Borough.
- It is recommended water quality should be monitored to ensure the highest possible standards, and it is not impacted by existing and future developments.
- Whalley's Quarry was mentioned several times with the suggestion of monitoring the effects of landfill sites on water quality. Again, we should learn from the mistakes from Whalley's Quarry.
- Growth in Audley is mentioned on numerous occasions with reference to the Water Cycle Study on page 55. It states Audley does not have the capacity at the treatment works the proposed growth in the Local Plan.
- A policy on water quality should protect all existing waterbodies, watercourses and habitats, and ensure the control of discharge and wastewater from new and existing development.
- The implementation of Sustainable Urban Drainage Systems (SUDs) should be strongly encouraged, and policies on Green Infrastructure should be adopted to reduce or prevent flood risk and water related impacts.
- The Local Plan should address water quality and flood risk management in line with paragraphs 159-169 of the NPPF.
- Up to date and relevant evidence should inform the Local Plan on water quality and flooding issues (e.g. River Basin Management Plans).

Question 27 Is a Local Plan policy on environmental quality required? If so, what should a policy on environmental quality contain?

- A strong percentage stated a policy on environmental quality is required for the Local Plan. Development proposals should not pose a threat to environmental quality.
- It is perceived that Green Belt release and development would compromise the quality of the environment within the rural areas.
- Efforts must be made to prevent fly-tipping.
- Environmental quality covers a broad spectrum of themes which was reflected in the responses. However, many comments were focused around the protection of the natural environment.
- Policies in the Local Plan should ensure new and existing development does not negatively impact on habitats and species, biodiversity (including international, national and local designated sites for nature conservation), air quality, water quality and amenity.
- Planning policies and decisions should protect and enhance the natural environment in accordance with paragraph 175 and 180a of the NPPF.
- The Local Plan should set out an approach to deliver biodiversity net gains from developments. This includes transport proposals, housing and community infrastructure etc.
- Policies should be in place to ensure the protection of irreplaceable habitats such as ancient woodlands, and ancient and veteran trees.
- The Local Plan should safeguard soils and versatile agricultural land as they play a role in carbon storage and sequestration – climate change mitigation.

Question 28 Do we need additional measures in the Local Plan to support national policies and guidance including the National Model Design Code on the design of development?

- Some confusion over what the National Model Design Code is and whether this was an appropriate discussion point
- A fair level of support was received for the principle of design codes to provide certainty to the development industry about design quality but also to improve the sustainability credentials of development
- A number of sustainable construction standards were referenced and suggested that these should be required in new development such as BREEAM and Passivhaus.
- Support from Sport England for using Sport England Active Design principles and from the County Council for reflecting cycle infrastructure design transport notes
- Some felt this was already clearly covered at a national level and that any change should be set through building regulations rather than the Local Plan
- Suggestions that officers and members should receive additional training on design
- Where appropriate, Neighbourhood Plans should feed into design codes.
- Public realm, Sustainable urban drainage, co-housing, affordable housing, renewable energy, adequate on and off road parking and heritage were also frequently referenced themes
- Mix of high level design framework in the Local Plan and more detailed codes in the Neighbourhood Plan could be used.
- Beautiful design is subjective, who decides?

Question 29 Do you agree that the Local Plan should set out identified areas for ecological recovery?

- The majority were in support of the Local Plan identifying areas for ecological recovery.
- The Local Plan should aim to achieve 10% biodiversity net gain as stated within the Environment Act. Any approach should be in line with paragraph 73, 104, 120, 174, 175 and 180a of the NPPF.
- Policies on ecological recovery should be informed by relevant evidence base work and should complement Nature Recovery Strategies at County level.
- Observations were made that the local plan evidence on ecology and biodiversity needs to be updated. Current evidence includes the Biodiversity Opportunities Mapping Report produced in 2014. Engagement with statutory and non-statutory stakeholders is encouraged when updating evidence and identifying sites for ecological recovery.
- Development plan policies should promote and encourage the use of the Biodiversity Metric 3.0 to calculate net gains and losses of biodiversity resulting from development.
- A Habitats Bank and offsetting sites register should be established to enable developer compliance, and resources to be directed towards important areas for nature recovery.
- Natural England and Chartered Institute of Ecology and Environmental Management provide good practice guidance for biodiversity net gain which could inform the Local Plan.
- As well as ecological recovery, the Local Plan should identify opportunities for new multi-functional green and blue infrastructure, and recognize the functions and benefits they provide (i.e. climate change mitigation, reduce flood risk, physical and mental well-being, education, amenity etc).
- It is perceived that all Green Belt sites are rich in biodiversity and should be protected. Development should not take place in the Green Belt. The former Keele Golf Course site and Chorlton Moss were highlighted as examples.

Question 30 Is a local policy on heritage required? If so, what should a local policy on heritage contain?

- Respondents overwhelmingly stated that they would like to see a local policy on heritage, with 97.5% of respondents answering in the affirmative. Of the 2 respondents who answered 'no', they stated that they did not think it would be required if it was simply a duplication of national policies. While all of the 78 respondents who answered 'yes' felt a policy should be in place to preserve, enhance, and promote local heritage, thoughts, suggestions and priorities concerning how this should be done varied.
- New developments should only be undertaken well away from places of historic interest. Designs should be sympathetic to the area and in keeping with other local buildings. Requirements that developments do not obstruct long-standing views.
- Measures should be in place to protect heritage assets from theft or damage. Every heritage asset should have its heritage status reviewed and changed if needed, each should have a protection management plan to examine what is being retained, and what must be done to protect it.
- Some felt that this should not be left in the hands of a lay person, and that skilled people with local knowledge should be making these assessments. An alternative approach was voiced by another respondent who felt that there is too much reliance placed on communities having the knowledge to designate heritage assets for the local list and more resources should be made available to help them do this. The importance of local knowledge was touched upon in many responses, with one respondent writing that this is a key reason why neighbourhood plans are so important, saying they should be used to inform local plans, because that community knowledge base is vital to recognising heritage significance.
- Among the responses we had, some took a broader view of heritage, they stressed that preserving heritage is not just about assets in the sense of buildings but can mean the protection of the countryside, lanes and footpaths. These are an important part of the borough's heritage and should be maintained at all times as part of any heritage policy.
- Multiple respondents felt that special consideration should be given in the Local Plan to protecting the Borough's industrial heritage. 6 responses used the word 'mining', 4 used 'industry', 2 used 'mine.' 2 used 'industrial.'
- Visitor centres, information boards, and monuments could be erected at sites of historic interest, work should be undertaken to offer tours to school parties and other groups, educational videos could be produced for online viewing, social media accounts dedicated to promoting local heritage could be set up. One respondent suggested that to further promote the history of the borough, consideration could be given to employing a small touring theatre group to visit schools and enact short plays about the history of the area.
- Another respondent suggested that Apedale could still be further developed; we could build an outdoor activities centre and encourage much more use of the heritage centre to attract paying visitors.
- Staffordshire County Council strongly advises that a local policy on heritage is required. It advises that an up-to-date historic environment evidence base is needed, the evidence base we have is not as robust as elsewhere. Our baseline understanding of the historic character and sensitivities of the borough is not where it needs to be, and that this is leaving us blind to the impact which medium to large scale development may be having. The County Council makes a number of detailed recommendations to remedy this in their representation.

Question 31 What are your perspectives on the policy approach advocated in the 2019 Strategic Flood Risk Assessment?

- The majority of comments were focused around content and why a policy on flood risk is required in the Local Plan, rather than specifically referring to the SFRA 2019. They are as follows:
- The natural environment is already at risk of flooding which impacts on habitats and species (biodiversity).
- Policies on flood risk should ensure landowners better manage their land to prevent or reduce water run-off, whether it is a result of agriculture practices or new and existing development. Development will result in an increase of surface run-off.
- A flood risk assessment should be required prior to any development. Upgrades to property and highway drains should be implemented to accommodate proposed growth.
- There is a general assumption that developing in the Green Belt would result in increasing flood risks.
- The local plan needs to acknowledge climate change, with the evidence indicating an increase in rainfall events, which in turn will increase flood risk.
- The Local Plan should actively promote the use of Sustainable Urban Drainage Systems (SuDS), and areas of natural drainage should be preserved to reduce flood risk.

Question 32 Do you agree that an open space policy should set out open space provision requirements in new developments?

- The majority were supportive of an open space policy establishing open space provision requirements from new developments.
- It is suggested that the quantum of open space provision should be in accordance with national policy and relevant evidence base work such as the Open Space Strategy.
- A Local Plan policy should make new and existing open space publicly accessible by foot and bike. This will encourage active lifestyles and offer travel alternatives to vehicles. It would promote sustainable modes of travel.
- New open spaces, walkways and cycle paths should be created to increase accessibility and connectivity across the Borough.
- The plan should recognise the benefits of open space provision. Open space provides health benefits both physically and mentally such as reducing obesity. Open space also provides environmental benefits such reducing flood risk and hosting wildlife.

Question 33 Is a Local Plan policy on transport required? If so, what should a policy on transport contain?

- Responses to this question answered overwhelmingly in the affirmative, with 96.34% of people saying 'yes'.
- A key theme in 'yes' answers was that more should be done by the local authority to ensure to promote alternatives to driving in a private vehicle which uses fossil fuel, and that a policy on transport in the local plan could enshrine this, and any such policy should be linked closely with policies concerning the environment, e.g. green infrastructure, air quality, ecological networks, and supporting resident's access to nature.
- Public transport should be cheaper and more reliable. There should be better co-ordination across the borough between bus, coach, and rail. More environmentally friendly public transport vehicles should be introduced for example electric or hybrid buses. It should be ensured that developments and expansions give greater consideration to walking, cycling, public transport and links to bus stops and stations, routes and service frequency. E.g. Any development north of Audley will need to include cycle/footway to Alsager station.
- Developers should also give greater consideration to the safety and usability of existing roads which can be affected by new developments.
- The network of walking and cycling routes across the Borough should be expanded, existing routes should be consolidated and improved. One respondent suggested that whenever possible cycling infrastructure should be segregated from the highway to increase safety and uptake of active travel.
- Respondents want the council to consider measures such as increased provision of electric vehicle charging points (EVCPs), at car parks and on all new developments (some adding the caveat; so long as they don't jeopardise the viability of the development).
- The County Council states their opinion that a policy on transport is required. The County Council considers walking, cycling and public transport as the key to sustainable transport and meeting the climate change declaration. The Staffordshire Local Transport Plan 2011 is outdated and does not reflect current policy. The policy will need to reflect Staffordshire's Local Cycling and Walking Infrastructure Plan (LCWIP) 2021 and Bus Service Improvement Plan 2021. The key evidence should include the Newcastle-under-Lyme Borough Integrated Transport Strategy. New development should be located and designed to limit journeys by car and should contribute to a step change in accessibility by active travel modes and public transport. The residual impact of traffic generation from new developments should be considered. Junction improvements, access roads and highway widening if deemed necessary should meet design standards.

Question 34 What measures would you like to see in a Local Plan policy on renewable energy?

- All consultees approved of a renewable energy policy for the Local Plan.
- The 'fabric first' approach was referenced on several occasions which has implications for building design. New buildings should be designed maximising the performance of components and materials they are made up of, ensuring buildings are energy efficient and eco-friendly.
- The installation of solar panels and sustainable heating systems (or pumps) should be a mandatory requirement for new build developments.
- Employment allocations or proposed development, specifically in relation to industrial and warehousing should be in proximity to the rail network. This would offer sustainable modes of transport for the transfer of goods.
- A design policy for new builds should establish design standards that go beyond the requirements of Building Regulations.
- There was confusion with carbon zero targets. The Council / Local Plan has set a carbon zero target for the Borough by 2030. The Government has set a carbon zero target for Britain by 2050. Is the Borough target realistic, and should it be more aligned with the Government's target?
- There was also the view that the Local Plan should not deviate away from Government targets for reducing carbon emissions. Higher targets may affect the viability of development schemes.
- Policies on renewable energy and climate change matters should be informed by the AECOM Climate Change Study. Several policy options and strategies from the evidence could be implemented through the Local Plan.

Question 35 Are there any other topics that the Local Plan should address?

- The environment and health were at the forefront of people's minds in answering this question.
- The word 'green' appeared in 13 out of 62 responses to this question, the word 'development' appeared 9 times. The majority of respondents who answered this question and who used these key words in their comments were against green belt loss/ release, though one respondent advocated a review of the existing green belt boundaries which they called out of date. Other comments expressed; that communities should be consulted on any developments in their areas, that the Local plan should give greater consideration to the climate emergency and the National Government's stated target of net zero by 2050, and that the Local Plan should give more consideration the impact which new developments have on local services and amenities like healthcare and schools.
- 2 respondents stated that the Local Plan should recognise the impacts which the HS2 project and the COVID-19 pandemic would have upon the Borough; as it relates to any housing site proposals, land charges, transport, environment, ecological recovery policies that may form part of the Local Plan.
- Related to COVID-19, the health of the Boroughs residents both in terms of mental and physical health and wellbeing was a key issue. 10 out of 62 responses to this question used the word 'health.' Within this context of the Local Plan promoting good health and wellbeing, respondents comments touched upon encouraging healthier lifestyles, safeguarding and improving open spaces and making sure residents have access to it, reducing pollution and introducing cleaner public transport, the creation of more cycle routes and footpaths for recreation and to enable active methods of commuting, developers needing to consider the health and wellbeing of residents in their proposals, and making activities and resources available to communities, especially the elderly, after what may have amounted to years spent in isolation.
- Two respondents referenced Walley's Quarry stating that greater consideration should be given to waste and minerals in the Plan, and that thought should be given to the perceived negative health impacts which the site could cause those living nearby.
- The suggestion that a Local Nature Recovery Strategy should be introduced, which would address concerns such as restoring degraded peatland, preventing large scale tree loss and replacing any lost trees, implementing root protection zones, and the creation and sequestering of habitats for carbon storage such as wetlands, woodlands, and diverse grasslands was made.
- There were some comments which touched upon communication about the progress of the Local Plan to residents of the Borough, and that this needed to improve. A small number of complaints were voiced here about the website. Several respondents also took this opportunity to re-iterate their feelings about previous consultation points.

Question 36 Are there any other matters you would like to make a comment on?

- There were a large number of individual letters which did not relate to any specific question but had general comments on the content of the plan
- Points raised included concern that the plan will have a negative impact on climate change, population and statistical issues, potential green belt loss, infrastructure issues.
- In addition to the template letter which made a number of detailed points of concern including the potential for development in Audley Parish including at J16 of the M6, there were further unique letters that raised similar issues particularly in terms of infrastructure in Audley Parish, impact on the transport network, disagreement with the rationale for more housing or large scale employment sites, concern over impact on land holdings, agriculture, the countryside, wildlife and the environment
- Some noted issues with the consultation such as that it was not transparent, not advertised well enough or that technical issues with consultation portal / objective made it difficult to submit comments. Some also suggested there were too many questions or that these were leading questions
- Some noted issues with the content of the document suggesting it was too long or language within the consultation document was difficult to understand and that the consultation period should have been extended to be able to read, digest, interpret and respond to the consultation material

Question 37 Do you have any files to upload?

- The majority of submissions to this question were more detailed and lengthily representations to the questions in the general consultation, often by organisations including statutory consultees or agents on behalf of landowners. Note: these have been summarised under the relevant questions
- There were a few detailed submissions which promoted specific sites with development potential seeking allocation through the Local Plan
- Some of the letters submitted as attachments addressed very similar to issues for those raised for question 36 including issues with the consultation and concern about potential development in Audley Parish

Report Settings Summary

Table 1

Event	Local Plan Issues and Options
Total Responses	3,604
Total Respondents	290
Questions	<i>Custom selection (see Table Of Contents)</i>
Filter	<i>(none)</i>
Pivot	<i>(none)</i>
Document Name	
Created on	2022-04-14 10:03:06
Created by	Jacob Wood

Question 1	4
Question 2	5
Question 4	6
Question 5	7
Question 8	8
Question 9	10
Question 11	12
Question 13	13
Question 14	14
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Question 21b	21
Question 24	22
Question 25	23
Question 26	24
Question 27	25
Question 30	26

Question 32	27
Question 33	28
Question 34	29

Question 1

Question responses: 138 (3.83%)

Do you agree with the Vision for the Borough?

Table 2

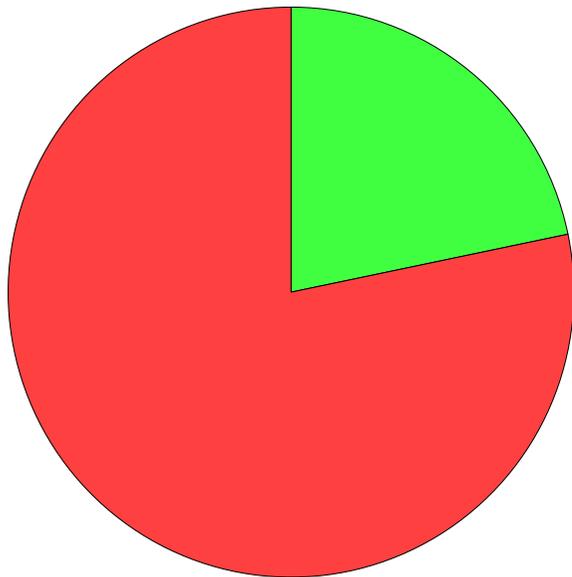


Table 3

	% Total	% Answer	Count
Yes	0.83%	21.74%	30
No	3.00%	78.26%	108
[No Response]	96.17%	--	3,466
Total	100.00%	100.00%	3,604

Question 2

Question responses: 134 (3.72%)

Do you agree with the Strategic Objectives?

Table 4

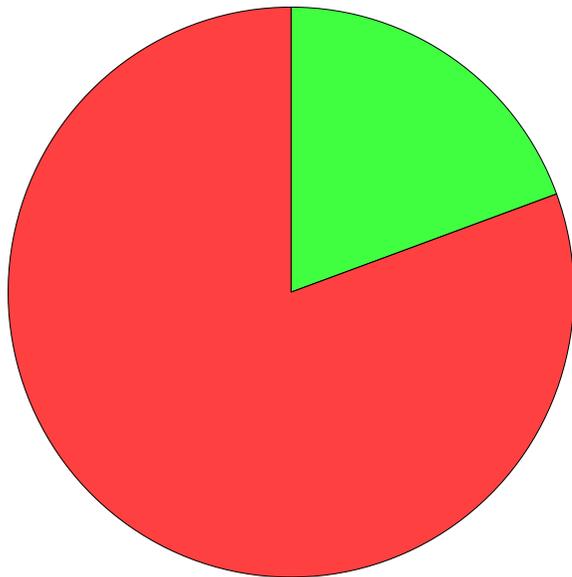


Table 5

	% Total	% Answer	Count
■ Yes	0.72%	19.40%	26
■ No	3.00%	80.60%	108
■ [No Response]	96.28%	--	3,470
Total	100.00%	100.00%	3,604

Question 4

Question responses: **101 (2.80%)**

Which option for growth is the most appropriate to use in the Local Plan?

Table 6

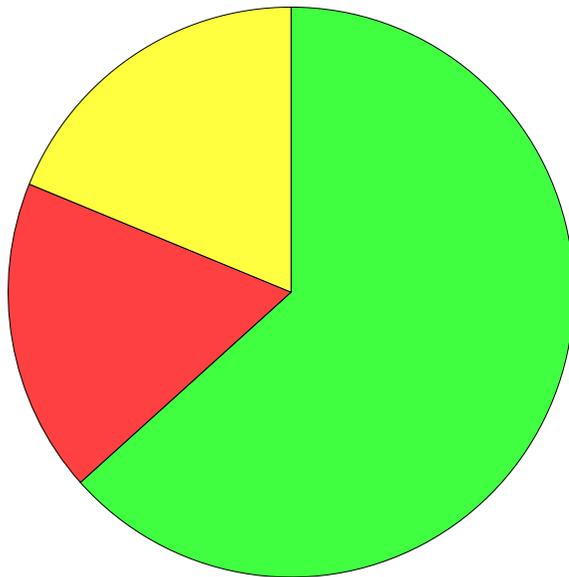


Table 7

	% Total	% Answer	Count
Option 1 - Nationally set growth target (Standard Methodology)	1.78%	63.37%	64
Option 2 - Sustainable growth target (Experian Baseline)	0.50%	17.82%	18
Option 3 - Greater job growth target (Experian Plus)	0.53%	18.81%	19
[No Response]	97.20%	--	3,503
Total	100.00%	100.00%	3,604

Question 5

Question responses: 100 (2.77%)

Do you agree with the proposed hierarchy of centres?

Table 8

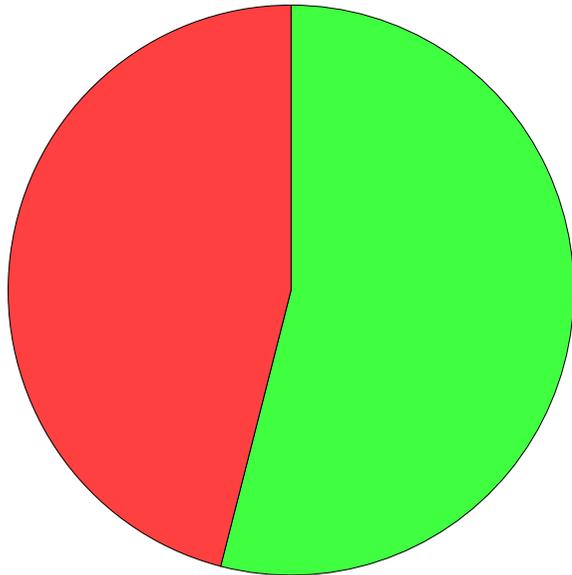


Table 9

	% Total	% Answer	Count
■ Yes	1.50%	54.00%	54
■ No	1.28%	46.00%	46
■ [No Response]	97.23%	--	3,504
Total	100.00%	100.00%	3,604

Question 8

Question responses: **78 (2.16%)**

Which option/s for expansion do you support?

Table 10

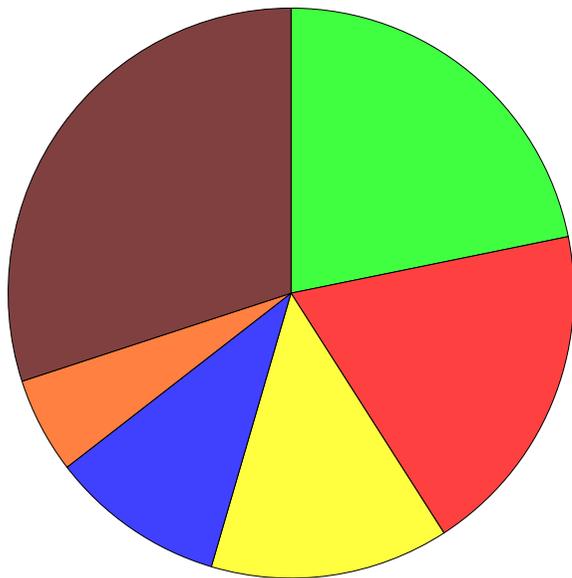


Table 11

	% Total	% Answer	Frequency	Count
■ Growth direction 1: Development on strategic sites outside the Green Belt - Large scale rural extensions	0.66%	21.82%	0.67%	24
■ Growth direction 2: Strategic green belt release for an urban extension - University Growth Corridor	0.58%	19.09%	0.58%	21
■ Growth direction 3: Green belt release for development of strategic sites - Talke and Chesterton expansion	0.41%	13.64%	0.42%	15
■ Growth direction 4: Green belt release for development of strategic sites - Kidsgrove expansion	0.30%	10.00%	0.31%	11
■ Growth direction 5: Green belt release for development of strategic sites - Audley Rural Expansion	0.17%	5.45%	0.17%	6
■ Growth direction 6: Combination of strategic sites across the Borough comprising both sites outside the green	0.91%	30.00%	0.92%	33

	% Total	% Answer	Frequency	Count
belt and sites which require green belt release				
<input type="checkbox"/> [No Response]	96.97%	--	97.84%	3,526
Total	100.00%	100.00%	0%	3,636

Question 9

Question responses: **123 (3.41%)**

Which option/s for expansion do you disagree with?

Table 12

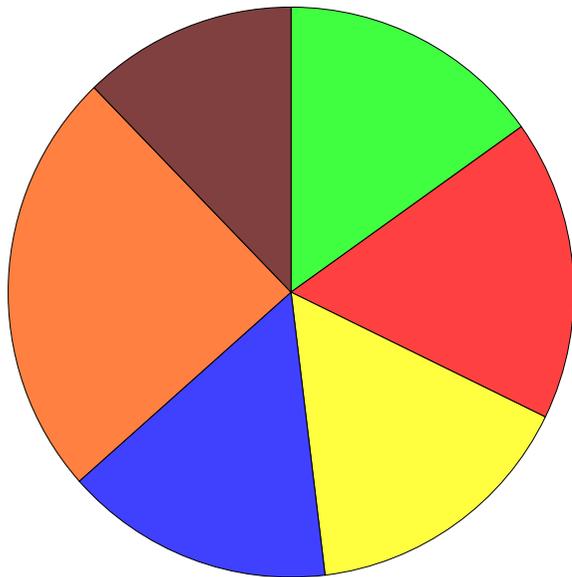


Table 13

	% Total	% Answer	Frequency	Count
■ Growth direction 1: Development on strategic sites outside the Green Belt - Large scale rural extensions	1.62%	15.14%	1.75%	63
■ Growth direction 2: Strategic green belt release for an urban extension - University Growth Corridor	1.82%	17.07%	1.97%	71
■ Growth direction 3: Green belt release for development of strategic sites - Talke and Chesterton expansion	1.69%	15.87%	1.83%	66
■ Growth direction 4: Green belt release for development of strategic sites - Kidsgrove expansion	1.64%	15.38%	1.78%	64
■ Growth direction 5: Green belt release for development of strategic sites - Audley Rural Expansion	2.59%	24.28%	2.80%	101
■ Growth direction 6: Combination of strategic sites across the Borough comprising both sites outside the green	1.31%	12.26%	1.42%	51

	% Total	% Answer	Frequency	Count
belt and sites which require green belt release				
<input type="checkbox"/> [No Response]	89.33%	--	96.59%	3,481
Total	100.00%	100.00%	0%	3,897

Question 11

Question responses: **91 (2.52%)**

Should development in the rural area be spread equally across the Rural Centres?

Table 14

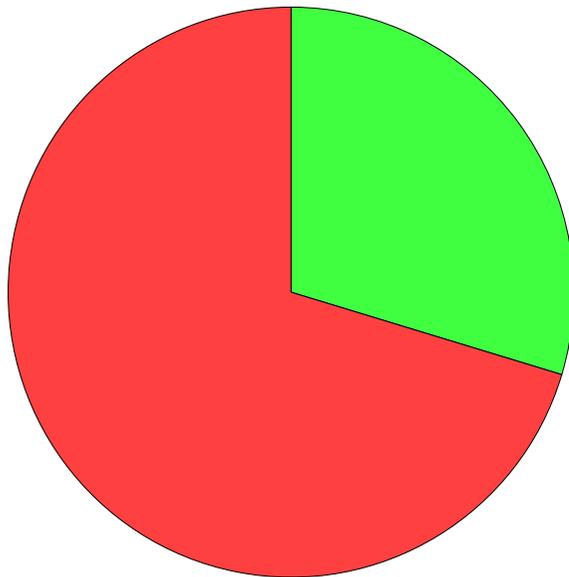


Table 15

	% Total	% Answer	Count
<input type="checkbox"/> Yes	0.75%	29.67%	27
<input type="checkbox"/> No	1.78%	70.33%	64
<input type="checkbox"/> [No Response]	97.48%	--	3,513
Total	100.00%	100.00%	3,604

Question 13

Question responses: 48 (1.33%)

Which option should the Council use to address the need for transit provision?

Table 16

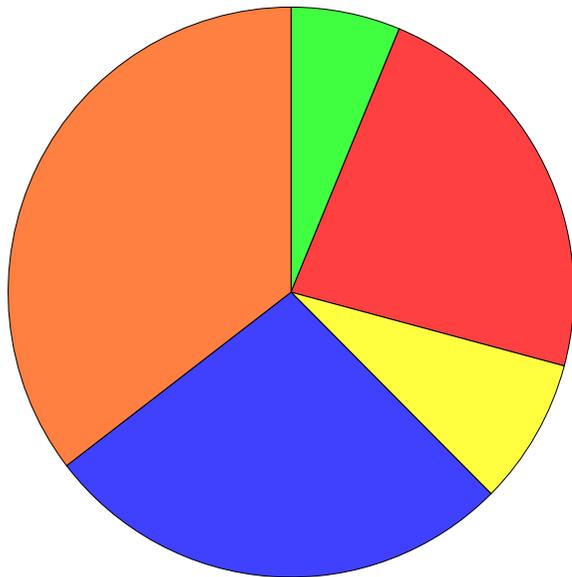


Table 17

	% Total	% Answer	Count
I. Transit Site with 3 pitches	0.08%	6.25%	3
II. Transit Site with 3-13 pitches	0.31%	22.92%	11
III. Temporary stopover site	0.11%	8.33%	4
IV. Negotiated stopping policy	0.36%	27.08%	13
Other	0.47%	35.42%	17
[No Response]	98.67%	--	3,556
Total	100.00%	100.00%	3,604

Question 14

Question responses: **87 (2.41%)**

Should the Local Plan set an alternative target for affordable housing to the national minimum (10%)?

Table 18

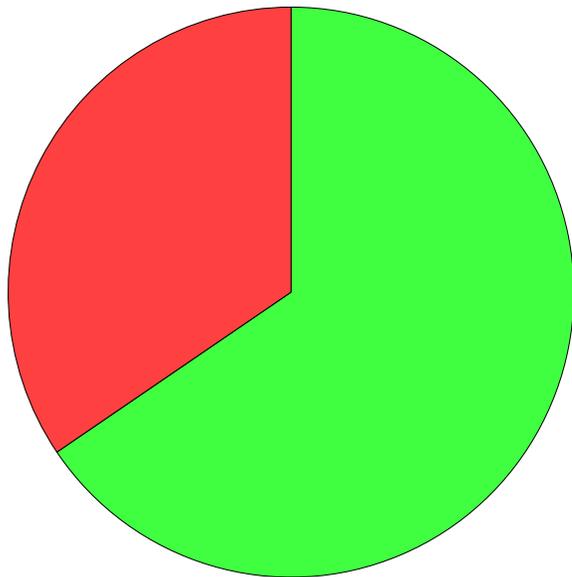


Table 19

	% Total	% Answer	Count
■ Yes	1.58%	65.52%	57
■ No	0.83%	34.48%	30
■ [No Response]	97.59%	--	3,517
Total	100.00%	100.00%	3,604

Question 15

Question responses: **72 (2.00%)**

Do you agree with the general ratio of 5% social rented, 2.5% first homes and 2.5% flexibility to make up the composition of affordable homes on qualifying sites?

Table 20

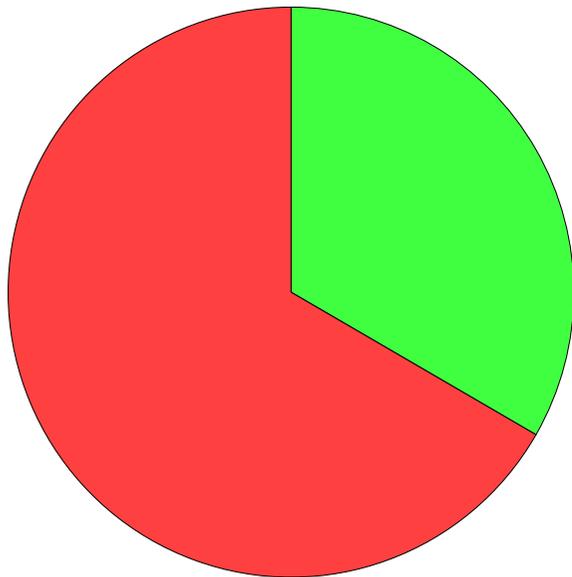


Table 21

	% Total	% Answer	Count
■ Yes	0.67%	33.33%	24
■ No	1.33%	66.67%	48
■ [No Response]	98.00%	--	3,532
Total	100.00%	100.00%	3,604

Question 17

Question responses: **94 (2.61%)**

Do you think a strategic employment site should be allocated in the Local Plan?

Table 22

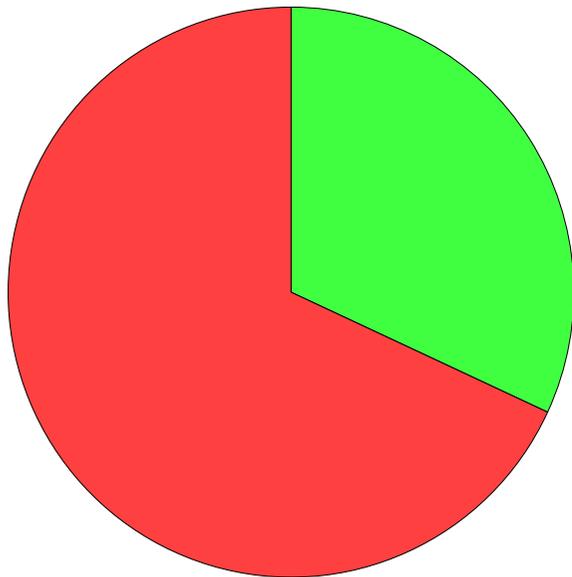


Table 23

	% Total	% Answer	Count
■ Yes	0.83%	31.91%	30
■ No	1.78%	68.09%	64
■ [No Response]	97.39%	--	3,510
Total	100.00%	100.00%	3,604

Question 18

Question responses: **126 (3.50%)**

Should site AB2 - Land south east of Junction 16 - be considered for green belt release?

Table 24

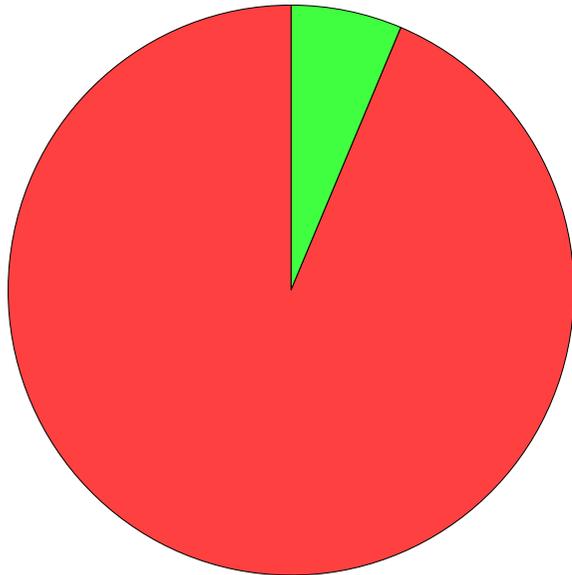


Table 25

	% Total	% Answer	Count
■ Yes	0.22%	6.35%	8
■ No	3.27%	93.65%	118
■ [No Response]	96.50%	--	3,478
Total	100.00%	100.00%	3,604

Question 19

Question responses: **96 (2.66%)**

Should Site KL15 - Land to the south and east of new development site, Keele University - be considered for green belt release?

Table 26

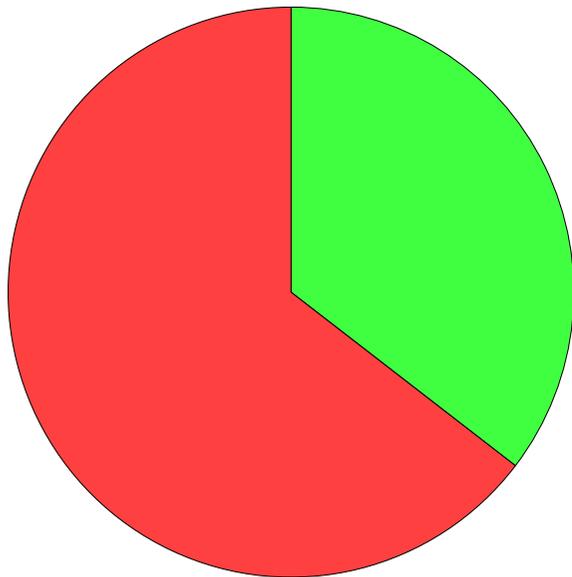


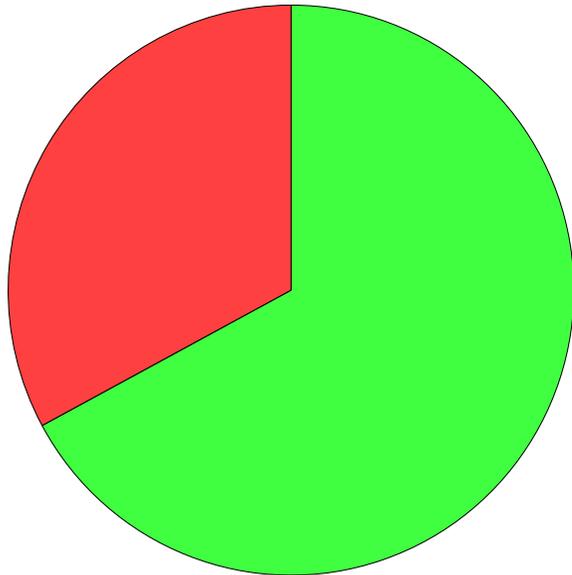
Table 27

	% Total	% Answer	Count
■ Yes	0.94%	35.42%	34
■ No	1.72%	64.58%	62
■ [No Response]	97.34%	--	3,508
Total	100.00%	100.00%	3,604

Question 20

Do you agree with the key principles of development boundaries?

Table 28



Question responses: **73 (2.03%)**

Table 29

	% Total	% Answer	Count
■ Yes	1.36%	67.12%	49
■ No	0.67%	32.88%	24
■ [No Response]	97.97%	--	3,531
Total	100.00%	100.00%	3,604

Question 21

Question responses: **72 (2.00%)**

Do you think the development boundaries should be reviewed?

Table 30

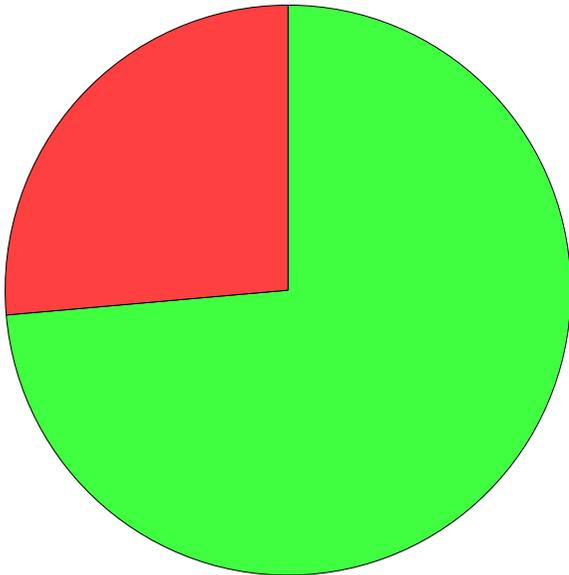


Table 31

	% Total	% Answer	Count
Yes	1.47%	73.61%	53
No	0.53%	26.39%	19
[No Response]	98.00%	--	3,532
Total	100.00%	100.00%	3,604

Question 21b

Question responses: **51 (1.42%)**

If so, through the Local Plan or through Neighbourhood Plans?

Table 32

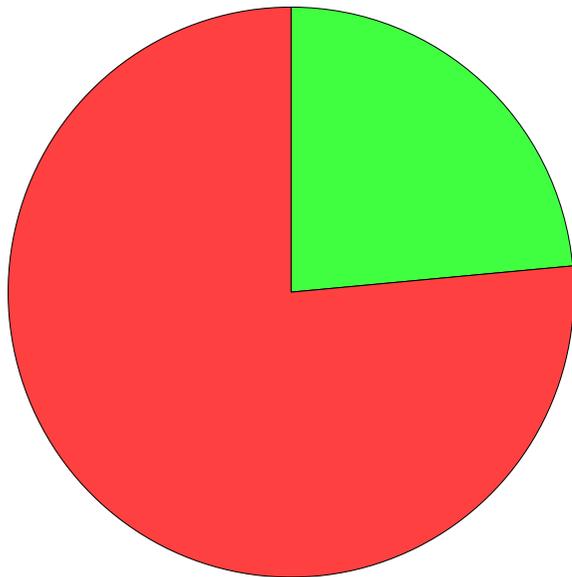


Table 33

	% Total	% Answer	Count
■ Local Plan	0.33%	23.53%	12
■ Neighbourhood Plans	1.08%	76.47%	39
■ [No Response]	98.58%	--	3,553
Total	100.00%	100.00%	3,604

Question 24

Question responses: **65 (1.80%)**

Do you agree with the recommended changes to the town centre boundaries?

Table 34

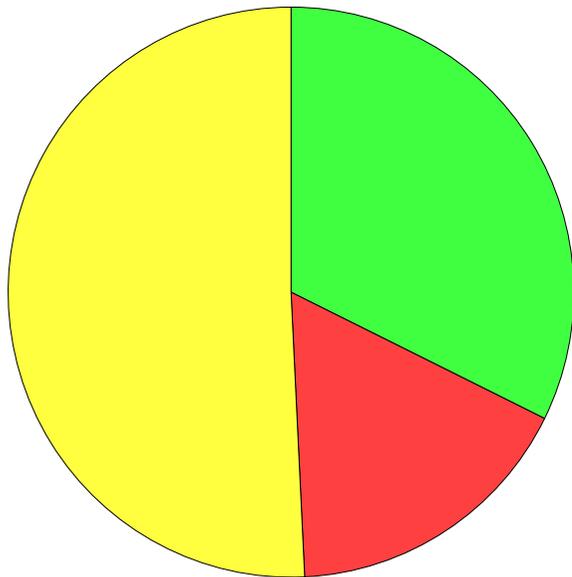


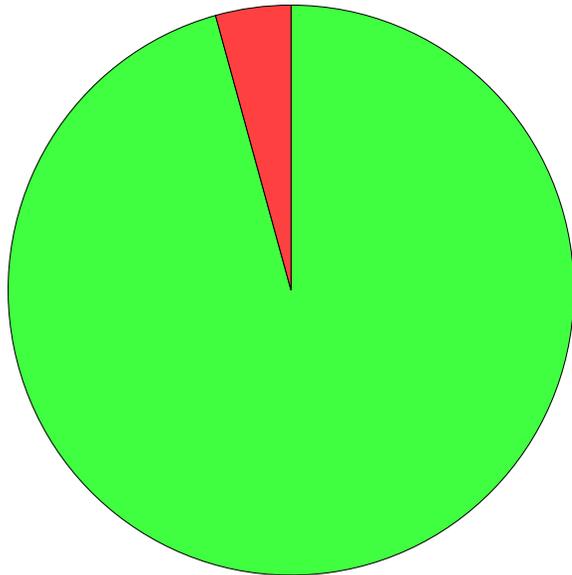
Table 35

	% Total	% Answer	Count
■ Yes	0.58%	32.31%	21
■ No	0.31%	16.92%	11
■ No opinion	0.92%	50.77%	33
■ [No Response]	98.20%	--	3,539
Total	100.00%	100.00%	3,604

Question 25

Is the Local Plan policy on air pollution required?

Table 36



Question responses: **93 (2.58%)**

Table 37

	% Total	% Answer	Count
■ Yes	2.47%	95.70%	89
■ No	0.11%	4.30%	4
■ [No Response]	97.42%	--	3,511
Total	100.00%	100.00%	3,604

Question 26

Question responses: **84 (2.33%)**

Is a Local Plan policy on water quality required?

Table 38

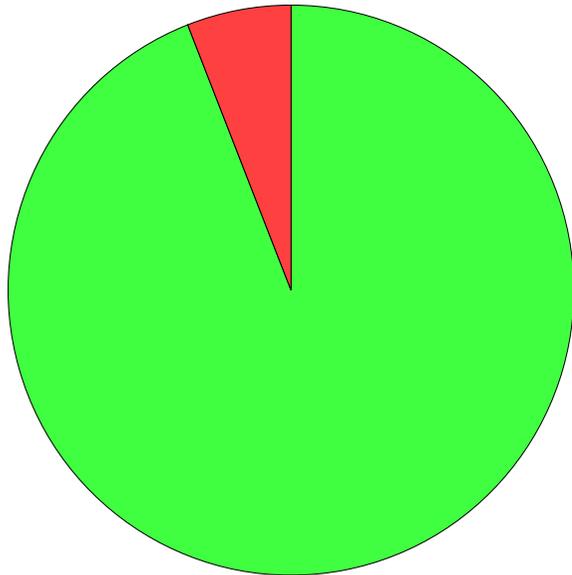


Table 39

	% Total	% Answer	Count
■ Yes	2.19%	94.05%	79
■ No	0.14%	5.95%	5
■ [No Response]	97.67%	--	3,520
Total	100.00%	100.00%	3,604

Question 27

Question responses: **84 (2.33%)**

Is a Local Plan policy on environmental quality required?

Table 40

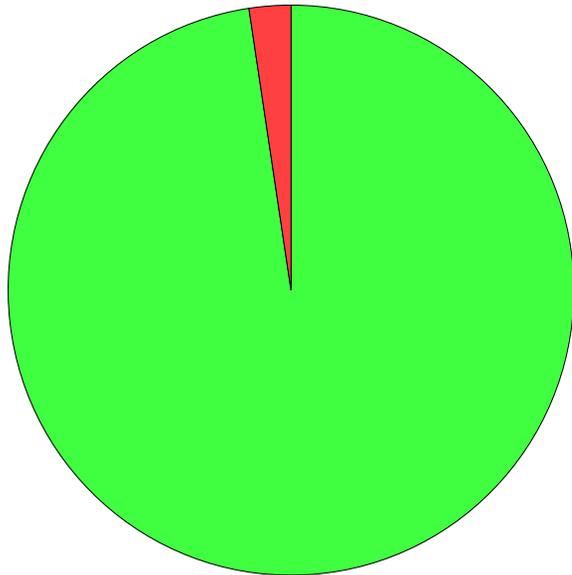


Table 41

	% Total	% Answer	Count
■ Yes	2.28%	97.62%	82
■ No	0.06%	2.38%	2
■ [No Response]	97.67%	--	3,520
Total	100.00%	100.00%	3,604

Question 30

Question responses: **80 (2.22%)**

Is a local policy on heritage required?

Table 42

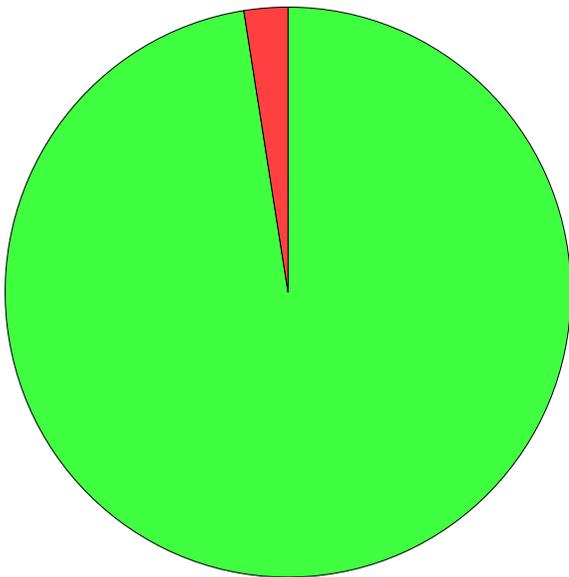


Table 43

	% Total	% Answer	Count
Yes	2.16%	97.50%	78
No	0.06%	2.50%	2
[No Response]	97.78%	--	3,524
Total	100.00%	100.00%	3,604

Question 32

Question responses: 79 (2.19%)

Do you agree that an open space policy should set out open space provision requirements in new development?

Table 44

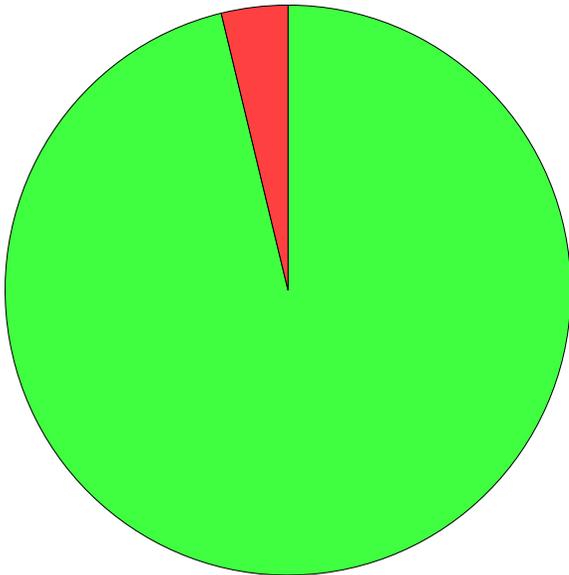


Table 45

	% Total	% Answer	Count
Yes	2.11%	96.20%	76
No	0.08%	3.80%	3
[No Response]	97.81%	--	3,525
Total	100.00%	100.00%	3,604

Question 33

Question responses: **82 (2.28%)**

Is a Local Plan policy on transport required?

Table 46

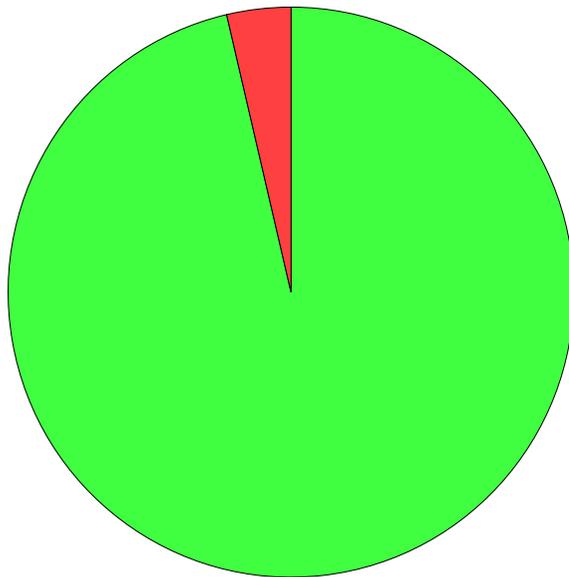


Table 47

	% Total	% Answer	Count
■ Yes	2.19%	96.34%	79
■ No	0.08%	3.66%	3
■ [No Response]	97.72%	--	3,522
Total	100.00%	100.00%	3,604

Question 34

Question responses: **79 (2.19%)**

What measures would you like to see in a Local Plan policy on renewable energy?

Table 48

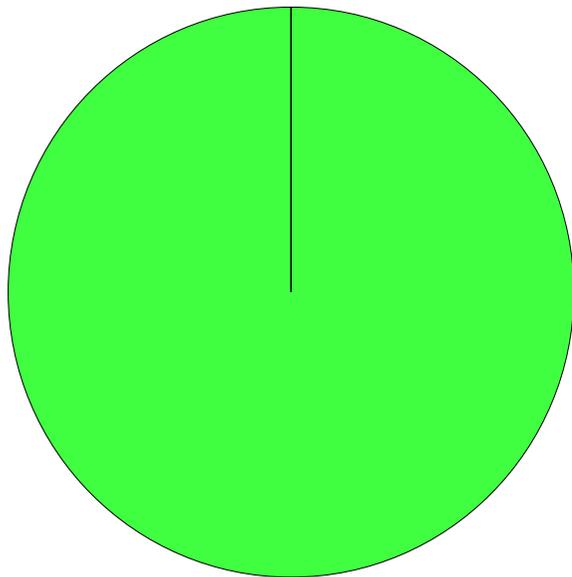


Table 49

	% Total	% Answer	Count
■ [Responses]	2.19%	100.00%	79
■ [No Response]	97.81%	--	3,525
Total	100.00%	100.00%	3,604

Our ref:

Your ref:

Date: 18 February 2022



Councillor Mike Stubbs

By e-mail only: mike.stubbs@newcastle-staffs.gov.uk

Castle House
Barracks Road
Newcastle-under-Lyme
Staffordshire
ST5 1BL

Dear Cllr Stubbs

Thank you for raising the concerns directly with me regarding the recent consultation undertaken at the Issues and Strategic Options stage of the local plan process. The specific complaints that you have articulated on behalf of the Labour Group are:

- The consultation was overly reliant on the online portal, and targeted at “Highly competent, computer literate regular laptop users who could cross reference up to 200 public documents to answer 37 planning specific questions”
- At the physical consultation events, response forms were not available, and that this was inconsistent with the Council’s Statement of Community Involvement”, and at events where provision was made for hard copy responses, staff support was not consistently provided.
- The local plan gives little regard to the preservation of the green belt.

In addition to these complaints, you have asked three specific questions relating to:

- Assessment of the communications and delivery strategy;
- Monitored feedback day on day and based on the numbers, and the interventions made because of the feedback;
- Taking account of different learning styles and neuro diversity of residents for example differing literacy abilities, visual impairments, dyslexia, and those with a registered disability, in addition to those whose primary language is not English;

These issues are addressed in the body of my response.

To ensure the points raised in your complaint are fully addressed, I have explored and challenged the design and execution of the consultation process in some detail with colleagues involved, and used your criticisms of the process as a lens through which to challenge assumptions and practice. In addition, I have tested our approach against that in other authorities.

Before setting out my detailed response I must make clear that the plan is at an early stage in its development and there are further rounds of public consultation to be undertaken. These further rounds will provide a focus on more detailed proposals that need to come forward in the draft and final versions of the local plan. This will give the community further opportunities to engage on the detail of the plan and the Council the opportunity to ensure that any consultation processes used,

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remain robust and accessible and in line with appropriate policy and practice.

Content of the plan

The “development plan”, of which the local plan has a lead role for the Borough, is at the heart of the planning system with a requirement set in law that planning decisions must be taken in line with the development plan unless material considerations indicate otherwise. Local Plans set out a vision and a framework for the future development of the area, addressing needs and opportunities in relation to housing, the economy, community facilities and infrastructure – as well as a basis for conserving and enhancing the natural and historic environment, mitigating and adapting to climate change, and achieving well designed places.

The broad content of plans is set at the national level and whilst the public may not be interested in every topic, it is important that the plan covers all aspects of development and that the Council encourages consideration of every aspect by asking questions as it did through this recent consultation on the Issues and Strategic Options. With a Local Plan, where there are a wide range of issues to consider, some elements of the plan may be of greater interest to key stakeholders, including the local community, than others. None of the 37 questions posed by the consultation were mandatory, meaning people only had to respond to the part or parts they were interested in.

There is a difficult balance to be struck between making the Local Plan simple enough for a wide range of individuals and stakeholders to understand whilst providing sufficient detail to allow an understanding of the justification for the issues and options being presented. The evidence which underpins the plan is set out in a series of documents and is provided as background for the interested reader – it is not information which is the subject of the consultation. The approach we have taken is compatible with the approach taken by other Councils at this “issues and options” stage.

Consultation Process

The consultation was carried out in accordance with the Statement of Community Involvement (SCI) which sets out how the Council will engage with the public on planning matters: <https://www.newcastle-staffs.gov.uk/planning-policy/statement-community-involvement-sci>.

The SCI describes how the public, businesses, parish and town councils and interest groups within a local authority area can get involved in the creation of local planning policy and the decision making process aimed at shaping where we live, work and trade. The SCI for the Borough was updated and published in September 2021.

The officers involved in developing the consultation have brought with them experience of consultation undertaken in other authorities, and also from when the Joint Local Plan with Stoke on Trent was being prepared.

Local Plans are required to be supported by evidence. It is not anticipated that members of the public will ordinarily want to read technical reports but the evidence is made available for public scrutiny and transparency and the key points linking proposals to the evidence base

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will be highlighted in the supporting text for the various topic areas in the Local Plan as it progresses. The independent Inspector will test the Plan and consider the evidence supporting proposed policies in detail, once the plan is submitted for public examination.

Consultation Advertising and Publicity

I have reviewed your comments regarding the advertisement and actual consultation that has been carried out by the Council. This was both extensive and appropriate and compliant with the Council's Statement of Community Involvement. In total we facilitated 13 public consultation events (including 3 virtual events) which were advertised as follows:

- Press Notices
- Press coverage in the Sentinel;
- Parish Councils were sent posters to put up around their parishes (electronic or physical copies on request);
- Officers took leaflets and posters to a variety of venues around the town centre including local supermarkets; and
- Targeted mailing of the statutory consultees, Parish and Town Councils, organisations, developers and the public from relevant contact information available on the Local Plan database over the course of the consultation;
- Through content on the front page of the Council's website;
- Through the Council's social media;
- Copies of the plan and posters were put up in all libraries across the borough and at Castle House

There were therefore many appropriate channels of communication considered and provided to advertise and publicise the consultation both before and during the event, in accordance with the Council's Statement of Community Involvement.

Duration of Consultation

The duration of the consultation is outlined in the Statement of Community Involvement and is in accordance with legislation being a minimum of 6 weeks. The length of the consultation is common to most authorities because it allows for the progression of the plan to Examination in the most efficient and reasonable timeframe. As you will be aware, the Government is seeking all authorities to have up to date local plans in place by the end of 2023.

In this instance, the consultation was extended due to a drafting error in one particular section of the consultation document. Therefore the corrected version of the plan was subject to a further consultation period. This was actually set to a further 8 weeks, rather than the minimum 6 weeks, to add extra time over the Christmas period to account for office closure during that time. This meant that the consultation actually took place over 14 weeks in total, over double the length set in the Statement of Community Involvement. Whilst this was not originally planned, it did provide additional time for people to get accustomed to the online portal or view the document in libraries and the Council's office, and to submit any comments they wished to by 24th January.

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There are also two further proposed rounds of consultation included within the project plan for the document, so by the end of the process the public will have had 3 distinct formal opportunities to engage with the plan and provide comments to the Council to express their views and ideas.

Accessibility

The document was available online and in person in accordance with legislation and the SCI. The document was physically available at venues where events were held, in libraries across the Borough and at the Councils offices. PDF copies could be downloaded from the website to read or to print out. This is a proportionate approach to making the document available and is an established and acceptable way in which Local Plans have been shared and no suggestions have been made on other approaches to make the document available.

From the outset of the consultation it was made clear that the Council would accept responses either through the online portal or by letter to the Council's address. Unfortunately some external social media content misrepresented this aspect of the consultation. Officers have taken the opportunity to correct assumptions about the validity of written representations. These corrections have been provided by officers in person at the events, in newsletters and on the Council's website. For the next stage of plan production and consultation we will also produce a Frequently Asked Questions (FAQ) page. This will direct people who may be confused about how they can make their representations, as well as providing additional clarity on all reference material.

Anyone whose first language is not English can make contact with the Council, where they would be directed to translation services. Any other accessibility request, such as braille services, could also be addressed in the same manner. It is considered proportionate to only produce different versions of the plan if specific requests are made, but importantly the main PDF document is an accessible version.

Consultation Events

As you are aware, the Council held 10 public consultation events at 9 venues around the Borough, plus 3 borough-wide virtual events where people could either use Zoom or have a phone call with an officer. Two events were held at Castle House which would serve the unparished areas, as well as at the Guildhall and at Chesterton. The geographical spread of events was selected to target populations likely to be concerned at proposed growth options whereas, in contrast, there is little undeveloped land available in the unparished area of the Borough. It is considered that the number and spread of events at this Issues and Strategic Options stage was not only proportionate but also would compare favourably to approaches taken by other local authorities, where some Councils have chosen either not to have physical events, due to the difficulties with making events 'Covid-safe' or hold them only in their central offices to reduce the administrative burden.

Regarding hard copy feedback at the events, the Statement of Community Involvement does

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refer to response forms being provided alongside hard copy reference documents during public consultation periods. The view was taken that the availability of a Consultation Summary Guide and accepting freeform written responses was a more inclusive approach to take. The guide provides both a summary of the content of the plan and information on submitting comments and contact details for the team if there were any queries.

The team did accept written representations from the public at events and we have also received a large number of postal representations and submissions to the reception at Castle House which are still in the process of being scanned and uploaded to the online portal. There is therefore no evidence to suggest that the lack of stand-alone feedback forms at the physical events has been a barrier to securing the views of those who attended such events.

Consultation Portal

I am sorry to hear some residents have had issues uploading their representations to the online consultation portal. The Council procured a market-leading consultation solution for Local Plans, known as Objective, and we understand that it is a new system that people may not yet be familiar with.

The benefits of the Objective system are that it provides a more secure way to store the comments made, as well as people's data, and it is also more effective with regard to reporting mechanisms which should provide a more efficient process when responding to comments that have been submitted. The public and other stakeholders can also choose which questions they want to respond to. This ensures that views are received and can be focussed on the sections of the plan that matter to them.

For these reasons, the Council are encouraging the use of the online portal to make comments. However physical copies of the document were available to read at all public libraries in the Borough and people were able to write into the Council's address at Castle House. We created a video and PDF to show people how to use the portal. The planning team have also been helping to show people at the consultation events across the Borough. Any queries that the team received about using the portal have also been responded to very quickly, via phone or email.

Objective representatives have also been engaged on any technical issue that the planning team are unsure how to resolve. It has been identified that user errors have led to some of the most common problems. For example, where an email address has been given to register on the portal but the user has failed to click on the link in their own email inbox to firstly verify the account.

The consultation process has resulted in the submission of thousands of public comments and in comparison we have received limited contact from the public regarding issues with the portal and the ability to submit comments in response to the consultation.

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Monitoring Consultation in Real Time

Throughout the consultation period, officers have monitored the process and reflected on any issues arising in real time. For example, whilst the consultation events were carefully planned, discussion took place following each event to identify any unexpected issues being raised, resourcing requirements, and format adjustments. This is standard practice when running any series of events, and allowed the quality of consultee experience to be maintained and improved over the 14 week period.

The team have been monitoring the planning policy inbox on a daily basis and handling phone calls at source. Any issues arising have therefore been resolved as quickly as possible and the team are able to resolve most issues without contacting the provider. In the event that a problem has been identified that cannot be resolved, the team request the user to provide a screenshot of the issue and send to the dedicated support team at Objective for resolution. e.g. where a concern was raised that the portal was not viewable on a certain brand of phone. Engineers at Objective checked the CSS (Cascading Style Sheets); the coding that formats the elements on the webpage to fit smoothly to ensure it could be viewed on all brands of mobiles and tablets and we tested it to make sure it worked before responding to the resident.

Councils across the country use such portals for consultations on Local Plans to successfully and accurately record a high number of detailed representations and personal data and to use the features which benefit the reporting of the main issues. Without such software there is a much higher risk that the consultation would not be carried out effectively or efficiently in line with the Council's Statement of Community involvement.

Green Belt

I have considered very carefully your concern that the consultation appears to give little regard to the preservation of green belt, and does not make a robust case for exceptional circumstances, failing to seek consideration for brown field sites and alternative under-utilised sites.

I have to say that I consider this to be an unjustified position given the current issues and strategic options stage the Borough is at in the local plan process and the associated content of the plan at this time. The document presents the "big issues" for the Borough in terms of housing need and the challenges of accommodating this, and is transparent about the process that will be undertaken to exhaust all potential sources of sites in the urban area, within development boundaries and on brownfield sites. It also sets out how the Council will explore all reasonable alternatives to releasing Green Belt land for meeting its development needs, including increasing site densities and discussions with neighbouring authorities to accommodate need as set out in the proposed Spatial Strategy text and diagram on pages 33-36.

Conclusion

In summary, I consider that the consultation was conducted effectively and in compliance with

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the Council's Statement of Community Involvement and the accessibility regulations. Officers have invested significant time and effort into both advertising and publicising the consultation on the Issues and Strategic Options and assisting the public to engage with it, either in person at events and through daily monitoring of emails, the online portal and answering phone calls.

Third party social media posts have at times articulated an inaccurate view of the consultation process which has not helped either the public's perception of the consultation, nor officer's role in delivering it. Although this cannot be prevented, the team have done their utmost to provide and cascade factual information and challenge false statements made to them.

Having thoroughly reviewed your concerns and complaints, I do not consider there to be any reasonable grounds for undertaking a repeat of the Issues and Strategic Options consultation. The focus for the team now is to ensure the thousands of comments generated and submitted in response to the consultation process are recorded, read, processed and responded to, so that the plan can develop and evolve to the next stage, taking submitted stakeholder comments into account to inform that more detailed development. I consider that to repeat the process at this stage could be viewed badly by the many stakeholders who have engaged with the process and submitted comments. Delaying the plan process could mean it would take longer to have an up to date Borough Local Plan in place to guide future development needs to the most appropriate and sustainable, planned locations. One of the consequences of this could be the reduced ability to resist unplanned development, frustrating the ambition for sustainable development in the Borough.

As I mentioned earlier, there are further stages of the development of the plan and further opportunities for community engagement with it. As with any evolving process, we will learn from the previous stages and build upon the successes and challenges that have been part of the process to date. I have no desire to take forward a plan that is not robust and I do not believe that this is the case at this current stage of development. I note the concern that you raise from the planning press earlier last year regarding some of the challenges that other plans have faced around the country. The team are aware of that situation and will take any learning from those examples on-board, as other authorities have, as the local plan progresses to ensure that it remains robust.

I thank you again for raising the concerns of the Labour group. I hope I have provided you with the reassurance that the plan will come forward taking account of the concerns you have raised.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Martin Hamilton', written in a cursive style.

Martin Hamilton
Chief Executive

martin.hamilton@newcastle-staffs.gov.uk

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