

Joint Local Plan Preferred Options Consultation Document

Report to Planning Committee 3rd January 2018

Purpose of the Report

1. To advise Planning Committee on the completion and outcome of the public consultation on the 'Strategic Options' stage of the Joint Local Plan.
2. To provide an update on the plan-making process for the Newcastle-under-Lyme and Stoke-on-Trent Joint Local Plan and to seek Planning Committee support to go out to public consultation on the Preferred Options Consultation document in line with the adopted Statement of Community Involvement.

Recommendations

1. **That Planning Committee notes the responses to the consultation exercise carried out on the Strategic Options Consultation Document, as detailed in the Strategic Options Consultation and Responses Document (Supporting Document 1), & summarised in the draft Preferred Options Consultation document.**
2. **That it be recommended to Cabinet to approve the publication of the draft Preferred Options Consultation document (Appendix 1) for public consultation purposes, in line with the methods of consultation set out in the adopted Statement of Community Involvement.**
3. **That a report be submitted to a subsequent meeting of the Committee on the results of the Preferred Options public consultation exercise, as part of the next stage of the Joint Local Plan process – Draft Plan late Autumn 2018.**

Reasons

To provide the Planning Committee the same report on the matters outlined above as is being submitted to Cabinet on 4th January 2018, and to give the Planning Committee the opportunity to make its views on the report known to Cabinet.

The draft Preferred Options Consultation document does not set or propose Council policy and so the decision to approve it for consultation purposes falls to the Executive - the Cabinet. The Planning Committee's terms of reference include the consideration of and commenting on issues of Planning Policy.

When preparing a Local Plan a Local Planning Authority is required to promote early and meaningful engagement and collaboration with neighbourhoods, local organisations and business and to consider any representations received.

To support the satisfactory progression of the Joint Local Plan.

1. Background

- 1.1** Planning Committee is aware of previous decisions to prepare a Joint Local Plan with Stoke-on-Trent City Council, including the adoption of a Joint Statement of Community Involvement and undertaking public consultation on the Issues and Strategic Options consultation documents published as part of the local plan-making process, in February/March 2016 and July/August 2017 respectively.
- 1.2** The Joint Local Plan is a statutory development plan and is being prepared with Stoke-on-Trent City Council. The plan period is 2013 (the baseline year for all evidence) to 2033 and will eventually replace the adopted Joint Core Spatial Strategy 2006 - 2026 (adopted 2009) and saved policies from the Newcastle-under-Lyme Local Plan 2003 – 2011.
- 1.3** The Joint Local Plan should demonstrate that each local authority is planning positively to meet its development needs and is contributing to a sustainable pattern of development. In doing so it should seek to achieve a balance between social, economic and environmental objectives. Key considerations going forward will, therefore, be the impact of the plan on the local economy, social infrastructure, including education; health and social care and community facilities, as well as, the environment, including transportation; flood and water management; ecology.
- 1.4** The previous Joint Local Plan public consultation on Strategic Options ended on the 22 August 2017. The results of the consultation exercise and the officer response thereto are contained within the Strategic Options Consultation and Responses Document (Supporting Document 1). The feedback from 104 individuals has helped to refine the draft vision, aims and objectives of the Joint Local Plan and has been taken into account in the development of the preferred development strategy. There is broad support for growth; however, there are differences of opinion about where this is accommodated between stakeholders (especially residents and developers). Having listened to the different comments and in the light of the Joint Local Plan's supporting evidence the draft Preferred Options Consultation document now aims to set out the Councils' preferred approach to development.
- 1.5** This public consultation stage therefore seeks the community's views on the proposed preferred approach towards identified business development and housing development needs, as well as, identifying preferred site options and a retail hierarchy. To clarify at this stage no sites are being allocated for development, this does not happen until the Full Draft Joint Local Plan is produced, scheduled to be published for consultation in November and December 2018.
- 1.6** Additional evidence, which has been prepared to inform the draft Preferred Options Consultation document, is a Joint Green Belt Assessment, the Draft Stoke-on-Trent Green Space Strategy, and the Councils' 2017/18 development monitoring, which includes, 5 year housing land supply statements for both Newcastle-under-Lyme and Stoke-on-Trent. It is important to ensure that the Joint Local Plan seeks to provide viable and deliverable housing sites to not only meet the requirements over the plan period, but also ensure there is a rolling 5 year supply of deliverable sites in the short, medium and long term.
- 1.7** A sustainability assessment has also been prepared to support the draft Preferred Options Consultation document. This sets out highline impact and issues to be addressed (this has tested all proposals against a set of economic, environmental and social sustainability objectives). The results of the appraisal are set out in a Sustainability Appraisal Report (Supporting Document 2), which will also be subject to consultation, together with a non-technical summary.
- 1.8** The draft Preferred Options Consultation document is to be considered by Planning Committee on the 3 January 2018. The recommendations of the Planning Committee will be reported to Cabinet via a supplementary report.

- 1.9** Stoke-on-Trent City Council's Planning Committee will consider the draft Preferred Options Consultation document for consultation purposes on 3rd January 2018 and their Cabinet will meet to consider their recommendations on 4th January, 2018.

2. Scope of the preferred options consultation

- 2.1** Consultation on the preferred growth and site options (draft Preferred Options Consultation document attached as Appendix 1) is an informal stage in the preparation of the Joint Local Plan aimed at giving a further opportunity for the community to comment on the future development strategy for Newcastle-under-Lyme and Stoke-on-Trent.
- 2.2** The draft Consultation document sets out the preferred options in respect of housing and economic growth and preferred site options for housing and employment. It also proposes a new retail hierarchy and the amendment of some town centre boundaries, including defining the Newcastle Town Centre boundary. The draft Preferred Options Consultation document covers the following subject areas:
1. Preferred Development Strategy and Options
 2. Key Strategic Developments
 3. Green Belt
 4. City, Town and Other Centres
 5. Natural and Rural Environment
 6. Waste and Minerals (Stoke-on-Trent only)
 7. Climate Change
 8. Infrastructure
 9. Character Areas
- 2.3** Members will be aware that in September, 2017, the Government published a consultation paper, which included a proposal to introduce a standardised methodology for calculating housing need. The proposed approach is based on a formulaic approach where the starting point is a demographic baseline from which an uplift is applied, where appropriate, to account for market signals (i.e. the affordability of homes). This would effectively form a minimum housing requirement for local authorities. However, the consultation does include proposals to allow local authorities to plan for growth if local circumstances support the case for doing so.
- 2.4** Given that the results of the Government's consultation are not expected to be published until March 2018 and any housing figure derived from the introduction of a standard national formula is therefore not yet fixed the Councils have received legal advice that it would not be appropriate at this stage to take it into account.
- 2.5** In respect of housing the draft Preferred Options Consultation document, therefore, relies on evidence in the published SHMA Review 2017, which recommended that housing growth is aligned with the area's economic growth potential. However the plan making process is flexible enough to make adjustments once firm details are received from Government and this will be taken into account as appropriate.
- 2.6** The Joint Local Plan is required to address the accommodation needs of Gypsy and Travellers and transit provision. At this stage a site selection methodology has been agreed between the two authorities and work is ongoing to identify how these needs can be met. Therefore at this stage the Councils will not be consulting on any preferred sites. However, to ensure that early and meaningful engagement is maintained it is proposed to arrange a separate consultation exercise on this specific matter in early summer 2018. This will be important as a failure to transparently engage and consult with stakeholders on strategy development could undermine the 'soundness' of the Joint Local Plan.

3.0 Preferred growth strategy

3.1 The proposed preferred growth option is Scenario C, as set out in the draft Strategic Options consultation document. This will deliver an identified need for a minimum of 199 hectares of employment land and 27,800 new homes between 2013 and 2033 across the plan area, with some potential uplift to help deliver wider economic aspirations, flexibility and choice where they can be demonstrated to be deliverable during the plan period.

3.2 This preferred option accords with the economic development strategies of both Councils and Staffordshire Local Enterprise Partnership and is aimed at addressing two very significant issues:

- A population that is generally getting older and consequently with fewer people of a working age, and;
- The Councils have not been building enough housing to meet demand over a sustained period of time. A direct consequence of this has been a growing disparity between supply and demand.

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

3.3 The consequences of these problems in the housing market can be summarised as follows:

- Low wage economy unable to afford increasing house prices;
- Young people unable to form households;
- Fewer working age people living in the area;
- Continued out migration of graduates and the economically active;
- Lack of a skilled workforce constraining investment and economic growth and;
- Deficiency in high value jobs, particularly in the knowledge economy and entrepreneurial sectors.

3.4 To address these issues the preferred development strategy aims to achieve a step change in the housing market and the local economy, through the delivery of a minimum of 17,372 jobs by 2033 across the plan area, including 6,654 in B Class sectors.

3.5 To support the creation of B Class jobs it is proposed to provide a minimum of 199 ha across the plan area, plus a 15% buffer (229 ha) to provide choice and flexibility in the market.

3.6 Newcastle-under-Lyme's contribution to the employment land supply is 62.53 ha. Within the Borough this leaves a shortfall of 5.5 ha, while Stoke-on-Trent benefits from a surplus of 36 ha, against its identified need of 131 ha (120 ha already have planning consent or have been built out). Therefore, across the functional economic area (plan area) there is no shortfall in the supply of employment land. Nevertheless, Newcastle-under-Lyme still has the potential to support the creation of at least 7,613 jobs including at least 4,437 in the B Class sectors.

3.7 The agreed apportionment of the housing requirement is 11,720 and 16,080 homes for Newcastle-under-Lyme and Stoke-on-Trent respectively.

Preferred spatial strategy and broad locations

- 3.8** The preferred option for the broad location of employment and housing development is a hybrid of Options 4 (Combined Urban, Suburban and Rural Villages) and 6 (Combined (Option 4) + Major urban extension in to the Green Belt) which were set out in the previous Strategic Options consultation. This focuses development within the urban area mainly around key urban centres and, as far as possible on brownfield land, or on greenspace no longer required to meet open space standards. However, Newcastle-under-Lyme's urban area is constrained by Green Belt making the delivery and identification of sites to meet the Borough's development needs more challenging.
- 3.9** Of Newcastle-under-Lyme's 11,720 dwelling apportionment the preferred option indicates that only 9,621 (includes 1,080 completions) of these can be accommodated within the urban area, rural area, and in sustainable urban extensions. Through the Joint Local Plan, the Borough Council is seeking to promote a significant mixed-use development in the Green Belt at Keele, as it is considered a strong case for "exceptional circumstances" can be made. This development has the potential to contribute significantly towards the development needs of the borough and plan area, to support Keele University's growth ambitions and associated economic growth in the same location. In total this development accounts for 9% (21% of the Borough's) of the Joint Local Plan's housing supply requirement. Urban extensions are also proposed at Kidsgrove, Holditch and Talke, bringing the total amount of development proposed within land currently designated as Green Belt to less than 11% (26% of the Borough's) of the Joint Local Plan's housing supply requirement. The full list of sites is shown in the draft Preferred Options Consultation document, at its Appendix 2 Preferred Options Sites.
- 3.10** A deliberate attempt has been made to limit the extent of incursion into the Green Belt to protect its integrity by focussing development in these four areas. Similarly the protection and enhancement of the countryside has been given due consideration. In this respect the housing sites beyond the Green Belt in the open countryside reflect existing commitments.
- 3.11** This leaves a shortfall in Newcastle-under-Lyme of 2,099 new homes. Consequently, your officers have approached Stoke-on-Trent City Council to see if it can accommodate this shortfall. Stoke-on-Trent has identified capacity for 16,892 dwellings, which is 812 dwellings above their apportionment of the supply. However, these additional homes act as a buffer to ensure flexibility of the sites coming forward. If this buffer is taken into account in helping to meet the housing requirement across the plan area this still leaves a residual shortfall of 1,287 dwellings. Options around meeting the residual shortfall are presently under consideration and these include identifying additional capacity within Newcastle-under-Lyme (potentially going further into the Green Belt or open countryside than the draft Preferred Options Consultation document currently sets out); identifying additional capacity within Stoke-on-Trent (above the additional 812 dwellings already taken into account; however albeit this will be largely dependent upon the viability of development within Stoke-on-Trent); and also finally consideration of asking neighbouring Local Planning Authorities if they can accommodate the residual shortfall within their areas. It is hoped that some or all of these strategies will result in the identification of the means to meet the Borough's shortfall.

City, Town and Other Centres

- 3.12** The draft Preferred Options Consultation document brings forward proposals to support a centres first approach and aims to make sure the centres are in the right locations to accommodate an appropriate level of retail development. This involves establishing a hierarchy of centres from strategic centres through to neighbourhood centres and proposes a town centre boundary for Newcastle-under-Lyme Town

Centre. It also acknowledges the position regarding out of town shopping centres where policies will ensure that these will be tightly controlled and must remain complementary to, and not compete with, the hierarchy of centres.

Natural and Rural Environment

- 3.13** The draft Preferred Options Consultation document outlines the position to protect the landscape and townscape, historic environment and green and open space. Individual strategies will outline where any proposed changes might be desirable (especially to deal with open space areas which create problems rather than add value) with quality being the under-pinning ambition. As outlined above 11% of the overall requirement is designated as Green Belt.

Infrastructure

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

Character Areas

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

4.0 Proposed public consultation

- 4.1** Subject to approval, the intention is to go out to public consultation on the document between 1st February 2018 and 1st March 2018. The document includes a set of consultation questions which will also be set out in a consultation response form which will be available via the Borough Council's website alongside the consultation document and supporting evidence. Preferred options are site specific and notices will be posted in addition to the usual consultation arrangements. Consultation will be carried out in line with the adopted Statement of Community Involvement.
- 4.2** Following the consultation exercise on the Preferred Options Consultation document all responses will be considered by both Councils and a response to each representation produced and reported back to each respective Cabinet in September 2018. The responses will help to inform the production and approval of the Draft Joint Local Plan, the next stage in the plan making process, when sites will be formally proposed to be allocated for development and new development management policies proposed. The Draft Joint Local Plan will be the subject of consultation in Autumn 2018 before the plan is then re-considered in light of further representations made, finalised and then submitted to the Secretary of State for independent examination. The independent examination on the final submission plan will be carried out by a government appointed inspector, to determine whether

the plan is sound and have been prepared in line with national planning policy and the duty to co-operate. Anyone who makes a representation during the preparation of the Joint Local Plan (at any stage) will be kept informed of the Plan's progress and invited to make further comments.

5.0 Duty to Cooperate

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

6.0 Legal and statutory implications

- 6.1** The Local Plan forms part of the Borough Council's Policy Framework and it must be compiled and adopted in accordance with statutory processes. These include conforming with the requirements set out within the Planning and Compulsory Purchase Act, 2004 ("the 2004 Act") and the Town and Country Planning (Local Planning) (England) Regulations 2012 ("the 2012 Regulations").
- 6.2** Once adopted, the Local Plan will replace the saved policies from the Stoke-on-Trent City Plan, 1993 and from the Newcastle-under-Lyme Local Plan 2003 – 2011, and the adopted Core Spatial Strategy.
- 6.3** The National Planning Policy Framework and the National Planning Practice Guidance contain guidance on how to prepare a Local Plan has been taken into account in the preparation of this report together with the legal requirements as set out in 2004 Act and the 2012 Regulations.
- 6.4** Regulation 18 of the 2012 Regulations require the Council as the Local Planning Authority to publish and consult on its proposal for the Local Plan and to consider any representations received.

7.0 List of Appendices

- Appendix 1 – Newcastle-under-Lyme and Stoke-on-Trent Joint Local Plan Preferred Options Consultation Document

8.0 Supporting Documents

- Supporting Document 1 - Strategic Options Consultation and Responses Document (hard copy agendas will not contain this document but a copy will be available at the Civic Offices)
- Supporting Document 2 – Preferred Options Consultation- Sustainability Appraisal

Background Papers

- Strategic Options Consultation Document July 2017
- Strategic Housing Market Assessment (July 2015) and Update June 2017.
- Strategic Housing Land Availability Assessment 2017
- The Employment Land Review – December 2015

- Newcastle-under-Lyme 5 Year Housing Land Supply Statement – August 2017
- Stoke-on-Trent 5 Year Housing Land Supply Statement – November 2017
- Stoke-on-Trent Annual Planning Monitoring Report - November 2017
- Draft Stoke-on-Trent Green Space Strategy 2017-2033
- Draft Technical Papers for Housing, Employment and Green Belt