

Newcastle-under-Lyme Local Plan

Sustainability Appraisal Scoping Report



August 2021

Table of Contents

INTRODUCTION.....	5
Requirement to undertake Sustainability appraisal and Strategic Environmental Assessment.....	5
Regulatory Requirements.....	5
Strategic Environmental Assessment (SEA) Directive	5
National Planning Policy Framework (NPPF) and the definition of Sustainable Development	6
Planning Practice Guidance	7
What is the difference between a Sustainability Assessment, a Strategic Environmental Assessment and an Environmental Impact Assessment?	7
Environmental Assessment of Plans and Programmes Regulations (2004).....	8
OTHER PLANS AND PROGRAMMES.....	10
International.....	10
National.....	13
Sub-Regional.....	20
Local Environmental.....	21
NEWCASTLE-UNDER-LYME REGISTER OF LOCALLY IMPORTANT BUILDINGS AND STRUCTURES.....	22
Local Social Plans and Programmes	24
Local Economic Plans and Programmes	26
Local Existing Planning Policy	27
Local Plans.....	27
BASELINE DATA	28
Locational Context	29
Environmental	30
Biodiversity, Fauna and Flora.....	30
European and other International Sites	30

Nationally Designated Sites – Sites of Special Scientific Interest (SSSI).....	31
Local Wildlife Sites/Local Geological Site.....	33
Local Nature Reserves (LNRs)	33
UK BAP Priority Habitats.....	34
Open Space.....	35
Ancient Woodland.....	36
Soil and Agricultural Land Classification	38
Water Quality	47
Water Extraction	49
Groundwater Quality	49
Air	50
Climate	51
Cultural Heritage.....	52
Listed Buildings and Structures.....	52
Scheduled Ancient Monuments.....	52
Local Listing.....	55
Landscape	55
Social	55
Population.....	55
Human Health.....	56
Life Expectancy	56
Mortality	59
Lifestyle Indicators	60
Physical Activity	60
Excess weight and obesity.....	61
Diabetes	62
Cardiovascular Disease	63
Cancer.....	63
Mortality attributable to particulate air pollution	65

Alcohol related harm	65
Liver Disease	66
Fuel Poverty.....	67
Excess Winter Deaths.....	68
Health Related Quality of Life.....	69
Mental Well-Being.....	70
Emergency Admissions to Hospital Due to Self-Harm.....	71
Suicide Rate	72
Noise Complaints.....	74
Housing	75
Joint Housing Needs Assessment (2020).....	75
Number of Houses	75
Vacancy Rates.....	75
Average house prices, average monthly private rental and affordability ratio	76
Household Tenure	76
Social Inclusiveness and Deprivation	76
Indices of Deprivation	76
Community and Safety.....	79
Police Recorded Violent Crime	79
Economic.....	81
Material Assets	81
Home Ownership	81
Economic Activity.....	82
Local Economy	84
Education.....	85
Keele University	85
Transport	85
Material Assets	86
Road Congestion	87

Car Ownership	87
Bus Patronage	88
Rail Patronage	88
Satisfaction Levels	88
Travel to Work	89
Traffic Incidents.....	90
Cycling and Walking	90
SUSTAINABILITY APPRAISAL OBJECTIVES.....	91
Previous SA Objectives	91
Amendments to SA Objectives	92
Changes arising from the update to the baseline data	92
Changes arising to the objectives from the consultation with statutory organisations...	94
New SA Objectives	94
SITE APPRAISAL FRAMEWORK.....	102
Presenting Findings.....	102
Reasonable Alternatives.....	103

Introduction

A Sustainability Appraisal Scoping Report has been prepared to support the Borough Local Plan. This Introductory section explains what the Scoping Report is and sets out the regulatory requirements and elements of the National Planning Practice Guidance which relate to Sustainability Appraisals.

The Scoping Report needs to identify the scope and level of detail of the information to be included in the sustainability appraisal report which will accompany the Local Plan. It is comprised of 2 main elements: a considered overview of other relevant plans and policies that relate to sustainability, and a baseline assessment of the characteristics of the Borough. Both of these highlight issues regarding sustainability which are used to formulate sustainability objectives. The final section of this report recommends a set of Sustainability Criteria which will be used to promote sustainable policy choices from options presented in the Local Plan.

Requirement to undertake Sustainability appraisal and Strategic Environmental Assessment

Regulatory Requirements

Section 19 of the Planning and Compulsory Purchase Act 2004 states that it is a requirement for local planning authorities to carry out a SA for each proposal made in a Local Plan during its preparation.

The Planning Practice Guidance (PPG) highlights that “More generally, section 39 of the Act requires that the authority preparing a Local Plan must do so “with the objective of contributing to the achievement of sustainable development.”

Strategic Environmental Assessment (SEA) Directive

The Strategic Environmental Assessment (SEA) Directive is a document published in September 2005 which gives guidance on applying the European Directive 2001/42/EC ‘on the assessment of the effects of certain plans and programmes on the environment’¹.

¹ <https://www.gov.uk/government/publications/strategic-environmental-assessment-directive-guidance>

The SEA Directive requires that the SA Scoping Report takes account of other relevant plans and programmes. This is to ensure that all objectives and considerations mentioned in these plans and programmes are taken in to account when producing a development plan document.

A full list of plans and programmes which are considered relevant are provided in the following section 'Other Plans and Programmes'.

National Planning Policy Framework (NPPF) and the definition of Sustainable Development

“The National Planning Policy Framework (NPPF) sets out the Government’s planning policies for England and how these should be applied. It provides a framework within which locally-prepared plans for housing and other development can be produced”².

Paragraph 32 of the NPPF states that “Local plans and spatial development strategies should be informed throughout their preparation by a sustainability appraisal that meets the relevant legal requirements. This should demonstrate how the plan has addressed relevant economic, social and environmental objectives (including opportunities for net gains). Significant adverse impacts on these objectives should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued. Where significant adverse impacts are unavoidable, suitable mitigation measures should be proposed (or, where this is not possible, compensatory measures should be considered)”.

The NPPF states that there are three overarching objectives to sustainable development which are interdependent and need to be pursued in mutually supportive ways. They are:

“a) **an economic objective** – to help build a strong, responsive and competitive economy, by ensuring that sufficient land of the right types is available in the right places and at the right time to support growth, innovation and improved productivity; and by identifying and coordinating the provision of infrastructure;

b) **a social objective** – to support strong, vibrant and healthy communities, by ensuring that a sufficient number and range of homes can be provided to meet the needs of present and future generations; and by fostering well-designed, beautiful and safe places, with accessible services and open spaces that reflect current and future needs and support communities’ health, social and cultural well-being; and

² National Planning Policy Framework (2019) Paragraph 1

c) **an environmental objective** – to protect and enhance our natural, built and historic environment; including making effective use of land, improving biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy”.

The NPPF clearly states that local planning authorities must consider the economic, social and environmental objectives during the plan making process. Paragraph 15 of the NPPF states “Succinct and up-to-date plans should provide a positive vision for the future of each area; a framework for addressing housing needs and other economic, social and environmental priorities; and a platform for local people to shape their surroundings”.

Planning Practice Guidance

National planning guidance on Sustainability Appraisal provides a more in depth overview of the process of SA. The Planning Practice Guidance states that “a sustainability appraisal is a systematic process that must be carried out during the preparation of local plans and spatial development strategies. Its role is to promote sustainable development by assessing the extent to which the emerging plan, when judged against reasonable alternatives, will help to achieve relevant environmental, economic and social objectives”³.

The guidance also states that “this process is an opportunity to consider ways by which the plan can contribute to improvements in environmental, social and economic conditions, as well as a means of identifying and mitigating any potential adverse effects that the plan might otherwise have. By doing so, it can help make sure that the proposals in the plan are appropriate given the reasonable alternatives. It can be used to test the evidence underpinning the plan and help to demonstrate how the tests of soundness have been met. Sustainability appraisal should be applied as an iterative process informing the development of the plan”⁴.

What is the difference between a Sustainability Assessment, a Strategic Environmental Assessment and an Environmental Impact Assessment?

“Strategic environmental assessments consider only the environmental effects of a plan, whereas sustainability appraisals consider the plan’s wider economic and social effects in addition to its potential environmental impacts”⁵.

³ Planning Practice Guidance Paragraph: 001 Reference ID: 11-001-20190722

⁴ Planning Practice Guidance Paragraph: 001 Reference ID: 11-001-20190722

⁵ Planning Practice Guidance Paragraph: 007 Reference ID: 11-007-20140306

“Sustainability appraisals should meet all of the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004”⁶. This therefore means that a separate strategic environmental assessment does not need to be produced alongside this sustainability appraisal. Further, Planning Practice Guidance states that an “Environmental Impact Assessment is applied to individual projects which are likely to have significant environmental effects”⁷.

Environmental Assessment of Plans and Programmes Regulations (2004)

The Environmental Assessment of Plans and Programmes Regulations was published in 2004 “to provide a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes with a view to promoting sustainable development”.

Preparation of an environmental report which effects the implementation of plans and programmes must take in to account:

- Outline of the plan or programme and relationship with other relevant plans and programmes;
- The current state of the environment and the potential change in the environment without the implementation of the plan or programme;
- The environmental characteristics of areas that are likely to be affected;
- Any existing environmental problems which are relevant to the plan or programme, including any relating to any areas of particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC;
- The environmental objectives, established at international, national or local level which are relevant to the plan or programme and how they have been taken into account during its preparation;
- The likely effects on the environment, including primary, secondary, cumulative, short, medium and long-term, permanent, temporary, negative and positive impacts. These include effects on (and between):
 - Biodiversity;
 - Population;
 - Human health;

⁶ Planning Practice Guidance Paragraph: 007 Reference ID: 11-007-20140306

⁷ Planning Practice Guidance Paragraph: 003 Reference ID: 11-003-20190722

- Fauna and flora;
 - Soil;
 - Water;
 - Air;
 - Climatic factors;
 - Material assets;
 - Cultural heritage;
 - Landscapes.
- The measures presumed to prevent, reduce and where possible fully offset any adverse effects on the environment caused by implementing the plan or programme;
 - Reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties encountered in compiling the required information;
 - The measures indicated for monitoring in accordance with Article 10 of the Environmental Assessment of Plans and Programmes Regulations 2004;
 - A non-technical summary of the information provided under the above headings⁸.

When producing a SA for plans and programmes, local planning authorities need to show a clear understanding of the area the plan/programme is intended to cover. Further, they need to clearly identify any areas beyond the plan/programme boundary which may still be impacted.

This forms the 'Baseline' for the SA. The local planning authority also needs to show the potential impacts on the baseline data if no plan or programme were to be introduced.

The SA Scoping Report also needs to show how social, economic and environmental conditions in the plan boundary can be monitored, as well as how the plan/programme itself can be monitored.

Summary

This section has detailed the regulatory framework, definition of sustainability in national policy and why the Council is producing a Scoping Report. For further detailed guidance on the process of Sustainability Appraisal, please see national planning practice guidance [<https://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal>].

⁸ A practical guide to the Strategic Environmental Assessment Directive
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/7657/practicalguidesea.pdf

Other Plans and Programmes

The regulations on undertaking a Sustainability Appraisal Scoping Report (SA) state that Local Planning Authorities must consider other plans and programmes when producing their report. This section provides an overview of international, national and local plans and programmes which Newcastle under Lyme Borough Council believe are relevant to the production of the SA.

There is no definitive list of plans and programmes which must be reviewed. Those listed below are deemed relevant by Newcastle under Lyme Council to the production of the Sustainability Appraisal Scoping Report. These lists will be kept under constant review during the production of the SA.

International

Table 1: International Plans and Programmes

Plan Name	Summary	Sustainability Theme
Paris Agreement (2016)	Adopted by 196 parties to limit global warming to well below 2, preferably 1.5 degrees Celsius, compared to pre-industrial levels.	Climate change mitigation
Aarhus Convention (1998)	Guarantees the access to information, public participation in decision making and access to justice in environmental matters.	Transparency of environmental data
Air Quality Framework Directive 2015/1480/EC	Amends several annexes to Directives 2004/107/EC and 2008/50/EC of the European Parliament and of the Council laying down the rules concerning reference methods, data validation and location of sampling points for the assessment of ambient air quality.	Improve air quality
The Convention for the Protection of the Architectural Heritage of Europe (Granada Convention)	The main purpose of the Convention is to reinforce and promote policies for the conservation and enhancement of Europe's heritage.	Transparency of environmental data

Bern Convention on the Conservation of Migratory Species of Wild Animals (1979)	Aims to promote co-operation between the signatory countries in order to conserve wild flora and fauna and their natural habitats and to protect endangered migratory species.	Improve biodiversity
Bern Convention on Conservation of Natural Habitats and Wild Fauna and Flora (92/43/EC, Habitats Directive) (1992)		
Convention on the Conservation of European Wildlife and Natural Habitats (1979)	Aims to conserve wild flora and fauna and their natural habitats and to promote European co-operation in that field. It places an importance on the need to protect endangered natural habitats and vulnerable species, including migratory species.	Improve biodiversity
The Convention on Wetlands of International Importance (The Ramsar Convention) (1971)	The only international mechanism for protecting sites of global importance and is thus of key conservation significance.	Transparency of environmental data
EU Birds Directive (2009/147/EC)	A legal framework, binding for all Member States, for the protection of all wild birds in the EU, including their eggs, nests and habitats.	Improve biodiversity
EU Sustainable Development Strategy (2006)	The overall aim was to identify and develop actions to a continuous long-term improvement of quality of life through the creation of sustainable communities able to manage and use resources efficiently, able to tap the ecological and social innovation potential of the economy and in the end able to ensure prosperity, environmental protection and social cohesion.	Encourage sustainable waste management
European Commission Biodiversity Strategy (2012)	A comprehensive, ambitious and long-term plan to protect nature and	Improve biodiversity

	reverse the degradation of ecosystems. The strategy aims to put Europe's biodiversity on a path to recovery by 2030.	
The European Convention on the Protection of Archaeological Heritage (Valetta Convention)	Sets guidelines for the funding of excavation and research work and publication of research findings. It also deals with public access, in particular to archaeological sites, and educational actions to be undertaken to develop public awareness of the value of the archaeological heritage.	Heritage/cultural conservation
European Landscape Convention (2000)	Promotes the protection, management and planning of European landscapes and organises European co-operation on landscape issues.	Strengthen the quality of landscapes
The Floods Directive (2007/60/EC)	A framework for the assessment and management of flood risks to reduce the negative consequences of flooding on human health, economic activities, the environment and cultural heritage in the European Union.	Development management in flood risk areas
Groundwater Daughter Directive (2006/118/EC)	Designed to prevent and combat groundwater pollution in the European Union.	Improve water quality
Habitat and Species Directive 92/43/EEC (1992)	Ensures the conservation of a wide range of rare, threatened or endemic animal and plant species.	Improve biodiversity
Kyoto Protocol (1997)	Commits industrialized countries and economies in transition to limit and reduce greenhouse gases (GHG) emissions in accordance with agreed individual targets.	Climate change mitigation

Nitrates Directive (91/676/EEC)	Aims to protect water quality across Europe by preventing nitrates from agricultural sources polluting ground and surface waters and by promoting the use of good farming practices.	Improve water quality
Water Framework Directive (2000/60/EC)	An EU directive which commits European Union member states to achieve good qualitative and quantitative status of all water bodies by 2015.	Improve water quality
(Wild) Bird Directive 79/409/EEC (1979)	Member states must ensure that all bird species have a sufficient diversity of habitats to maintain their populations. The Directive provides provision for the re-establishment of damaged habitats, creation of protected areas and re-establishment or creation of biotopes.	Improve biodiversity
World Heritage Convention (1972)	The primary mission of the Convention is to identify and protect the world's natural and cultural heritage considered to be of Outstanding Universal Value.	Transparency of environmental data

National

Table 2: National Plans and Programmes

Plan Name	Summary	Sustainability Theme
National Planning Policy Framework (NPPF)	The revised National Planning Policy Framework sets out government's planning policies for England and how these are expected to be applied.	Encourage Sustainable Development

Good Practice Advice Notes	The GPAs address plan-making and decision-taking, and other issues which are important in good decision-making affecting heritage assets.	Heritage/cultural conservation
Historic England Advice Notes	These are advice notes covering various planning topics in more detail and at a more practical level. They have been prepared by Historic England following public consultation.	Heritage/cultural conservation
Ancient Monuments and Archaeological Areas Act (1979)	To make provision for the investigation, preservation and recording of matters of archaeological or historical interest and (in connection therewith) for the regulation of operations or activities affecting such matters.	Transparency of environmental data
The Climate Change Act (2008)	The Act requires the Government to set legally binding emissions targets, called carbon budgets, every five years. It also established an independent expert body, the Committee on Climate Change (the CCC), to advise Government on the level of those emissions targets.	Climate change mitigation
Conservation of Habitats and Species Regulations (2017)	These regulations consolidated the Conservation of Habitats and Species Regulations 2010, and made minor modifications. Regulation 43 makes it an offence to deliberately capture, kill or disturb certain wild animals or to trade in them. Regulation 45 prohibits the use of certain methods of capturing or killing wild animals.	Improve biodiversity

DCLG (2013) CIL Guidance	Explains what the Community Infrastructure Levy is and how it operates. The Community Infrastructure Levy is a charge which can be levied by local authorities on new development in their area. It is an important tool for local authorities to use to help them deliver the infrastructure needed to support development in their area.	Ensures access to necessary facilities
DCLG (2012) Neighbourhood Planning	The guidance explains the neighbourhood planning system introduced by the Localism Act, including key stages and considerations required.	Ensures sustainable community development
DECC (2011) National Energy Statement (EN1)	Sets out national policy for energy infrastructure. It has effect on the decisions by the Infrastructure Planning Commission on applications for energy developments.	Climate change mitigation
Defra (2013) Adapting to Climate Change: Ensuring Progress in Key Sectors	Ensure climate change risk management is systematically undertaken by reporting authorities and helps ensure public service and infrastructure are resilient to climate change. Monitors the level of preparedness of key sectors to climate change.	Climate change mitigation
Defra (2007) The Air Quality Strategy for England, Scotland, Wales and Northern Ireland	Sets out objectives and policy options to further improve air quality in the UK from today and into the long term. These options are intended to provide important benefits to quality of life and help to protect our environment.	Improve air quality

Defra (2011) Biodiversity 2020: A Strategy for England's Wildlife and Ecosystems Services	A biodiversity strategy for England built on the Natural Environment White Paper and provided a comprehensive picture of how we are implementing our international and EU commitments. It set out the strategic direction for biodiversity policy for the next decade.	Improve biodiversity
Defra (2013) Government Forestry Policy Statement	Sets out clear priorities for future policy-making, focused on protecting, improving and expanding our public and private woodlands.	Improve biodiversity
Defra (2005) Making Space for Water: Taking forward a new Government strategy for flood and coastal erosion risk management in England	Takes account of sustainable development and the Government's strategic priorities. Reflects lessons learned from the flood events in recent past. Addresses the challenged and pressures we are facing over the next century such as climate change, development pressures and rising levels of risk and coast.	Flood risk management
Defra (2012) Noise Policy Statement for England	Aims to promote good health and a good quality of life through the effective management of noise within the context of Government policy on sustainable development.	Improve health of residents
Defra (2004) Rural Strategy	Provides the policy framework, the tools and the evidence base to help all Government Departments, regional and local partners work together in a collaborative way to deliver more sustainable rural communities and an enhanced and enriched countryside.	Improve green infrastructure Sustainability choices made locally

Defra (2011) Safeguarding Our Soils	Aims to ensure all England's soils will be managed sustainably and degradation threats tackled successfully by 2030.	Improve geodiversity
Defra (2015) sustainable Drainage Systems – Non-statutory Technical Standards for sustainable Drainage Systems	Non-statutory technical standards for the design, maintenance and operation of sustainable drainage systems to drain surface water.	Flood risk management
Environment Act (2005)	Contains a range of measures to improve the quality of the local environment by giving local authorities and the Environment Agency additional powers to deal with.	Sustainability choices made locally
Flood and Water Management Act (2010)	Provides for better, more comprehensive management of flood risk for people, homes and businesses, helps safeguard community groups from unaffordable rises in surface water drainage charges, and protects water supplies to the consumer.	Flood risk management
Flood Risk Regulations (2009)	Provides the Environment Agency and local authority's guidance on their responsibilities when preparing flood risk management plans.	Flood risk management
Government and Forestry Policy Statement (2013)	Sets out clear priorities for future policy-making, focussed on protecting, improving and expanding our public and private woodlands.	Improve biodiversity
Health and Social Care Act (2012)	Introduced the first legal duties about health inequalities. Sets a framework for the public sector to take action to reduce inequalities within England at local and national levels.	Improve access to healthcare

JNCC/Defra (2012) UK Post 2010 Biodiversity Framework	Identifies the activities required to complement the country biodiversity strategies, and where work in the country strategies contributes to international obligations. In total, 23 areas of work were identified where all four countries agreed that they wanted to contribute to, and benefit from, a continued UK focus.	Improve biodiversity
Localism Act (2011)	Seeks to give effect to the Government's ambitions to decentralise power away from Whitehall and back into the hands of local councils, communities and individuals to act on local priorities.	Sustainability choices made locally
The Marmot Review Implications for Spatial Planning (2011)	Provides evidence about the relationships between health and spatial design, and the socio-economic gradient in environmental disadvantage.	Improve access to healthcare
The 2020 Flood and Coastal Erosion Risk Management Strategy	Sets out a vision of a nation ready for, and resilient to, flooding and coastal change – today, tomorrow and to the year 2100.	Food risk management
National Policy Statements for Energy	Sets out the Government's policy for delivery of major energy infrastructure.	Climate change mitigation
National Policy Statements for Transport	Sets out the Government's policy for delivery of major transport infrastructure.	Improve sustainable transport
National Policy Statements for Water, Waste Water and Waste	Sets out the Government's policy for delivery of major waste water infrastructure.	Improve water quality
Natural Environment and Rural Communities Act (2006)	Created Natural England and the Commission for Rural Communities and extended the biodiversity duty	Improve biodiversity

	set out in the Countryside and Rights of Way Act to public bodies and statutory undertakers to ensure due regard to the conservation of biodiversity.	
Natural Environment White Paper (2011)	Recognises that the healthy natural environment is the foundation of sustained economic growth, prospering communities and personal wellbeing.	Improve green infrastructure
Planning Listed Building Conservation Area Act (1990)	Altered the laws on granting of planning permission for building works, notably including those of the listed building system in England and Wales.	Heritage/cultural conservation
The Rural Economy Growth Review (2011)	A package of measures designed to stimulate sustainable growth in the rural economy and help rural businesses to reach their full potential.	Equal access to facilities across the borough
Urban Waste Treatment Directive (1991)	Concerns collection, treatment and discharge of urban waste water and the treatment and discharge of waste water from certain industrial sectors.	Improve water quality
The Water Act (2014)	Enables greater competition for non-household customers and gives Ofwat new powers to make rules about charges and charges schemes, as well as making provision for flood insurance and drainage boards.	Improve water quality
Wildlife and Countryside Act 1981, as amended)	The primary legislation which protects animals, plants and habitats in the UK.	Improve biodiversity

Sub-Regional

Table 3: Sub-regional Plans and Programmes

Plan Name	Summary	Sustainability Theme
Staffordshire Local Nature Partnership (LNP)	Has the vision to make Staffordshire a more prosperous and healthy environment to live in and believes that economic development can and must go hand-in-hand with the protection of the County's important environmental assets.	Importance of both economic and environmental development
Landscape Character Areas (LCAs) – Shropshire Cheshire and Staffordshire Plain (NCA 61) and The Potteries and Churnet Valley (NCA 64)	LCA documents identify and explain the unique combination of elements and features that make landscapes distinctive by mapping and describing character types and areas. LCAs are used to inform planning policies, the allocation of land for development, the assessment of planning applications and the process of Environmental Assessment.	Strengthen the quality of landscapes
Meres and Mosses Nature Improvement Area (Defra)	Focused on making better places for nature, people and communities by improving and protecting core sites, and connecting them by restoring the wetland habitats in and around them.	Improve green infrastructure
River Basin Management Plans (RBMP) – Humber RBMP, North Western District RBMP and Severn RBMP	RBMPs set out how organisations, stakeholders and communities will work together to improve the water environment.	Improve water quality
Staffordshire Trent Valley Abstraction Licensing Strategy (February 2013)	A licensing strategy to manage water resources in the Staffordshire Trent Valley Area.	Improve water quality
Flood Risk Management Plans (FRMP) – Humber, North West and Severn Basin Districts	FRMPs set out how organisations, stakeholders and communities will work together to manage flood risk.	Flood risk management

Severn Trent's Water Resource Management Plan (2019)	Sets out how water will be supplied to all customers for the next 25 years and beyond.	Improve water quality
Stoke-on-Trent and Staffordshire Local Enterprise Partnership	The LEP brings businesses and local authorities together to drive economic growth, create jobs and raise skill levels.	Improve employment opportunities
Stoke-on-Trent and Staffordshire LEP ;Strategic Economic Plan Part 1 – Strategy'		
Staffordshire Chambers Business Manifesto 2015	Sets out principles of businesses in Staffordshire. It identifies barriers to employment and economic growth. It also recommends action by business and policy makers, both local and national, to stimulate enterprise and ambition.	Improve employment opportunities
Stoke-on-Trent and Staffordshire: Growth Deal Two	Focuses on town and city centre development, with major improvements to Stoke-on-Trent city centre access, alongside programmes to enhance the appeal of our attractive town centre, encouraging footfall and growing business opportunities.	Protect and enhance the vitality and viability of city, town and district centres

Local Environmental

Table 4: Local Environmental Plans and Programmes

Plan Name	Summary	Sustainability Theme
Staffordshire Historic Environment Record	A database of over 21,000 archaeological sites and monuments, historic buildings and historic landscapes across the county. The HER also has information on archaeological interventions (such as excavations	Heritage/cultural conservation

	and surveys) and provides an index to a wide range of sources on the county's historic environment.	
Newcastle-under-Lyme Register of Locally Important Buildings and Structures	The register is generally used to raise awareness in the community of our local heritage and to try and protect it from harmful change and demolition.	Heritage/cultural conservation
Stoke-on-Trent City Council and Newcastle-under-Lyme Borough Council Natural and rural Environment Technical Paper	Summarises the key evidence and key challenges arising in relation to Green Infrastructure (open space) across both Stoke-on-Trent and Newcastle-under-Lyme.	Improve green infrastructure
Staffordshire Biodiversity Action Plan (SBAP) (1998)	The SBAP has been in place since 1998 in order to co-ordinate conservation efforts in delivering the UK Biodiversity Action Plan targets at a more local level.	Improve biodiversity
Staffordshire Geodiversity Action Plan (2010)	Produced to influence policy by liaising with local planning authorities and ensuring that geodiversity issues are incorporated in to local planning documents.	Improve geodiversity
Newcastle-under-Lyme Open Space and Green Infrastructure Strategies	A guide to how the Borough Council managed its open space to ensure that the needs of the community are being met in the most appropriate way. The strategy also addresses how land outside of the council's ownership is provided and maintained.	Improve green infrastructure
The Minerals Local Plan for Staffordshire 2015-2030	The new Minerals Local Plan is required to take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning	Promote recycling of materials, and where not possible,

	<p>Policy Framework. This involves meeting objectively assessed needs for minerals and should be based on core planning principles including conservation and enhancement of the natural environment and reducing pollution as well as conserving heritage assets.</p>	<p>efficient use of resources</p>
<p>Staffordshire and Stoke-on-Trent Joint Municipal Waste Management Strategy 2013 Refreshed Headline strategy</p>	<p>Local Authorities across Staffordshire and Stoke on Trent have collaborated to produce a refreshed Joint Waste Management Strategy, setting out the direction for Waste Management in Staffordshire up to 2020 and retained the Zero Waste objective. The refreshed document was written in 2013 to create additional outcomes for the remaining years of the Waste Management Strategy.</p>	<p>Encourage sustainable waste management</p>
<p>Staffordshire Warmer Homes</p>	<p>A scheme run by Staffordshire County Council, in partnership with district and borough councils. The goal is to combat fuel poverty across the county and help residents to heat their homes.</p>	<p>Meeting housing needs</p>
<p>Staffordshire Local Flood Risk Management Strategy 2015</p>	<p>Sets out roles and responsibilities for flood risk management, assessed the risk of flooding in the county, where funding can be found to manage flood risk, what our policies are as a Lead Local Flood Authority and what our objectives and actions are to manage flood risk.</p>	<p>Flood risk management</p>

Newcastle-under-Lyme Contaminated Land Strategy (2014)	The council's strategy to remediating contaminated land and bringing it back to successful use.	Promote and enhance the vitality of city, town and district centres
Staffordshire County Council Rights of Way Improvement Plan – also relevant to Newcastle-under-Lyme	This ROWIP establishes a framework for managing the rights of way network over the next 10 years and sets out our priorities for improving it to meet the needs of today's users. The ROWIP proposes a series of actions to help achieve our priorities and will guide the targeting of our resources in future.	Improve sustainable transport Strengthen the quality of landscapes
Air Quality Action Plan for Newcastle-under-Lyme 2019-2024	This document details how the council is going to be improving air quality both in the 4 Air Quality action Areas and across the borough as a whole.	Improve air quality

Local Social Plans and Programmes

Table 5: Local Social Plans and Programmes

Plan Name	Summary	Sustainability Theme
Staffordshire Health and Wellbeing Strategy 2015-2020	Sets out how the group plan to deliver their vision over the next five years. It provides strategic guidance and focus to enable organisations achieve the identified outcomes which will improve health and wellbeing of the local population.	Improve access to healthcare
Newcastle-under-Lyme Playing Pitch Strategy 2015-2020	Provides a clear, strategic framework for the maintenance and improvement of existing outdoor sports pitches and	Improve access to retail and

	ancillary facilities between 2015 and 2020.	leisure facilities
Newcastle-under-Lyme Sustainable Community Strategy 2008-2020	Aims to shape a local identity with strong, safe and attractive communities and creating a thriving economy offering opportunity for all.	Protect and enhance the vitality and viability of city, town and district centres
Gypsy and Traveller and Travelling Showperson Accommodation Assessment (2015)	Provides information about the current and future accommodation needs of Gypsies and Travellers, and Travelling Showpeople; as well as providing information about additional support needs.	Meeting housing needs
Newcastle-under-Lyme Housing Strategy 2016-2021	Supports the delivery of affordable housing and development and provides help and advice for finding a home. Reduces the number of empty homes, gives support to the private sector and promotes independence and inclusion to our most vulnerable residents.	Meet housing needs
Newcastle-under-Lyme Homelessness and Rough Sleeping Strategy 2020-2025	This strategy sets out the council's priorities for the development of its homelessness strategy for the period 2020 to 2025.	Reduce homelessness
A Whole Life Disability Strategy for Staffordshire 2018-2023	A set of principles and actions that will underpin the way the county council works with families, communities and partners to meet the needs of people with physical or learning disabilities, autism, and sensory impairments.	Equal opportunities for all
Staffordshire Learning Infrastructure Framework 2015-2020	Aims to set out how those who provide childcare or education can work together to make the best use of	Equal access to education for all

	money and time. It sets out the purpose, principles and approach to the provision of education and childcare places, infrastructure development and capital investment.	
--	---	--

Local Economic Plans and Programmes

Table 6: Local Economic Plans and Programmes

Plan Name	Summary	Sustainability Theme
Newcastle-under-Lyme Borough Council Economic Development Strategy – Growing out People and Places 2019-2023	Sets out the council's aspirations and priorities for the next four years and focuses on place and infrastructure, business environment and people and ideas.	Improve employment opportunities
Newcastle-under-Lyme Borough Council Asset Management Strategy 2018/19-2021/22	Seeks to demonstrate how the council deploys its land/property assets to support the needs of the borough's residents.	Meeting the borough's needs
Staffordshire Local Transport Plan (Staffordshire County Council, 2011)	The plan covers walking, cycling, public transport, car based travel and freight, together with the management and maintenance of local road and footways.	Improve sustainable transport
Stoke-on-Trent Transport Plan 3 – also relevant to Newcastle-under-Lyme	Intended to explain the forward transport priorities within the area of Stoke-on-Trent with detailed plans for future investment in the period 2011/12 to 2013/14 but also to provide strategy and direction for the next 15 years, to 2025/26.	Improve sustainable transport

Local Existing Planning Policy

Table 7: Local Existing Planning Policy

Plan Name	Summary	Sustainability Theme
Newcastle-under-Lyme and Stoke-on-Trent Core Spatial Strategy (2006-2026)	Sets out a broad framework for the future development of the whole of Newcastle-under-Lyme and Stoke-on-Trent.	Sustainable development across both areas
Newcastle-under-Lyme Local Plan (2011) Saved Policies	These policies were saved beyond September 28 th 2007 by the Secretary of State for Communities and Local Government, and are yet to be replaced by new policies in the Newcastle Development Framework. The Newcastle-under-Lyme and Stoke-on-Trent Core Spatial Strategy explains the important history, context and physical characteristics of the area, together with a description of the key challenges and opportunities which the area faces.	Sustainable development across Newcastle-under-Lyme
Newcastle-under-Lyme Borough Council Supplementary Planning Documents (SPDs) <ul style="list-style-type: none"> • Affordable Housing 2009 • Town Centre 2009 • Developer Contributions 2007 • Knutton and Cross Heath Development Sites Phase 1 2008 • Newcastle-under-Lyme and Stoke-on-Trent Urban Design Guidance 2010 • Register of Locally Important buildings and Structures 2012 	The Supplementary Planning Documents (SPDs) support the strategy and policies for Newcastle-under-Lyme in the Core Strategy, which was adopted in 2009.	Sustainable development across Newcastle-under-Lyme

Local Plans

Progression to date of Local Plans within neighbouring authorities is as follows:

- Cheshire East: Local Plan Strategy 2010-2030 was adopted 27 July 2017; Site Allocations & Development Policies Document was submitted for Examination 29 April 2021
- City of Stoke on Trent: Regulation 18 (of the Town and Country (Local Planning) (England) Regulations 2012) Issues & Options Consultation undertaken in Spring/Summer 2021
- Shropshire Local Plan: Regulation 19 Pre-submission draft of the Local Plan consulted upon in late 2020/early 2021
- Stafford: The Plan 2011-2031 was adopted 19 June 2014, with Part 2 (incorporating aspects such as settlement boundaries) adopted 31 January 2017. Work has now commenced on the preparation of new planning policy documents
- Staffordshire Moorlands: The Local Plan 2014-2033 was adopted on 9 September 2020

Baseline Data

The following section sets out baseline requirements, the available relevant data on the three aspects of sustainability – social, economic and environmental. From this baseline data, and the other plans and programmes set out in the previous section, the sustainability criteria will be produced.

Government guidance on Strategic Environmental Assessments and Sustainability Appraisals states that “the term ‘baseline information’ refers to the existing environmental, economic and social characteristics of the area likely to be affected by the plan, and their likely evolution without implementation of new policies. It provides the basis against which to assess the likely effects of alternative proposals in the draft plan. The area likely to be affected may lie outside the local planning authority boundary and plan makers may need to obtain information from other local planning authorities”⁹.

“Wherever possible, data should be included on historic and likely future trends, including a ‘business as usual’ scenario (i.e. anticipated trends in the absence of new policies being introduced). This information will enable the potential effects of the implementation of the plan to be assessed in the context of existing and potential environmental, economic and social trends”¹⁰.

⁹ Planning Practice Guidance Paragraph: 016 Reference ID: 11-016-20190722

¹⁰ Planning Practice Guidance Paragraph: 016 Reference ID: 11-016-20190722

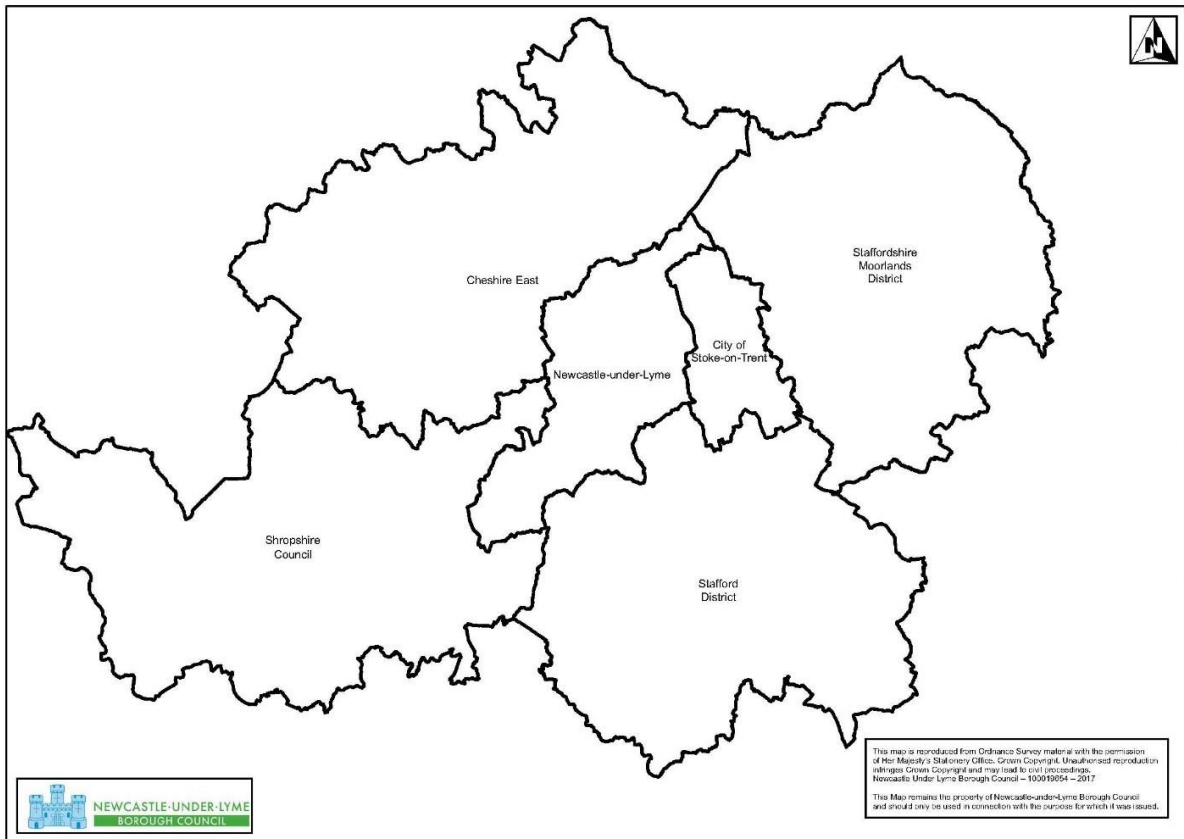
Table 8 shows the baseline data that is required for SA and SEA assessments of plans and programmes. The remainder are considered to be locally important. Note that green boxes indicate information which is required by the Environmental Assessment of Plans and Programmes Regulations 2004.

Social	Economic	Environmental
Population	Material assets	Biodiversity
Human Health	Education	Fauna
Housing	Employment	Flora
Community and safety	Transport (impacts on social and environmental)	Soil
Social inclusion and deprivation	Leisure and tourism (impacts on social and environmental)	Water
		Air
		Climate
		Cultural heritage
		Landscape

Table 8 Baseline data required for SA and SEA assessments of plans and programmes.

Locational Context

The map below (Map A) shows the locational context of Newcastle-under-Lyme. The borough is located between Manchester and Birmingham, and to the west of Stoke-on-Trent. It is also in close proximity to the Peak District National Park, located to the east, and Derby which is located to the south east of Stoke-on-Trent. The county town of Stafford is to the south.



Map A: Locational context of Newcastle under Lyme

Environmental

Biodiversity, Fauna and Flora

The most valuable habitats, species and geological sites are protected through various statutory and non-statutory designations. Sites of nature conservation importance with 'statutory protection' receive protection by means of certain legislation in recognition of their biodiversity or ecological value. 'Non statutory' designations are not protected under legislation, but still possess substantive nature conservation value based on important, distinctive and threatened habitats and species.

European and other International Sites

The borough contains two statutory protected RAMSAR sites; Midland Meres and Mosses Phase 1 & 2 at Betley Mere¹¹. These are recognised as wetlands of international importance under the Ramsar Convention.

¹¹ <https://designatedsites.naturalengland.org.uk/>

Nationally Designated Sites – Sites of Special Scientific Interest (SSSI)

There are five Sites of Special Scientific Interest (SSSIs) in Newcastle-under-Lyme, and they are as follows:

- Burnt Wood SSSI (located in Loggerheads Ward)
- Maer Pool SSSI (located in Maer & Whitmore Ward)
- Black Firs & Cranberry Bog SSSI (located in Madeley & Betley Ward)
- Betley Mere SSSI (located in Madeley & Betley Ward)
- Metallic Tileries, Parkhouse SSSI (located in Bradwell Ward)

The map below (Fig.1) shows the location of Sites of Special Scientific Interest and Ramsar Sites in Newcastle-under-Lyme.

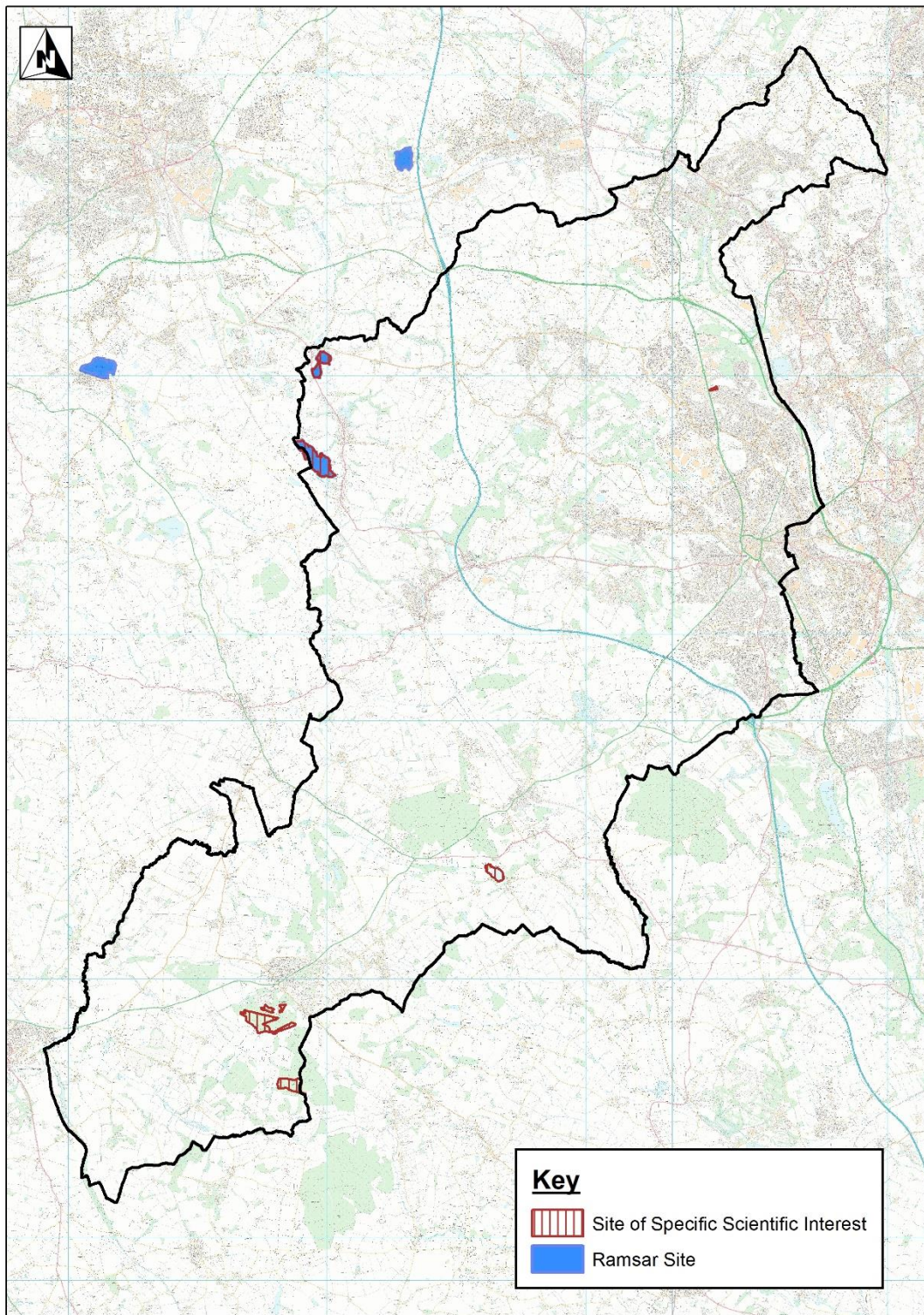


Figure 1 Sites of Special Scientific Interest and Ramsar Sites in Newcastle-under-Lyme

Source: Natural England

Natural England monitors the conditions of SSSIs with the goal of achieving 'favourable condition' status, meaning that all SSSI habitats and features are to be in a healthy state. As of April 2021 the condition monitoring for Burnt Wood was found to be 5.51% Unfavourable – Recovering, with 94.49% Unfavourable – No change. Maer Pool was found to be 100%

Unfavourable – Recovering. Black Firs & Cranberry Bog was found to be 100% Unfavourable – No change. Betley Maer was found to be 38.36% Unfavourable – Recovering, with 61.64% Unfavourable - No change. Metallic Tileries, Parkhouse was found to be 100% Unfavourable – No change. As you can see all SSSI's within Newcastle-under-Lyme are in a steady unfavourable condition with no deterioration. In some cases the SSSI's have begun to show some signs of recovery.

Local Wildlife Sites/Local Geological Site

Local Wildlife Sites vary in size and shape and support locally and nationally threatened wildlife. Many of these designations contain habitats and species that are prioritised under the county or UK Biodiversity Action Plans (BAP). Collectively they play a critical role in the conservation of the UK's natural heritage providing wildlife refuges, and acting as corridors and buffer zones to link and protect other site networks and the open spaces of our towns and countryside.

Non-statutory local designations in Newcastle-under-Lyme include 855 hectares of Sites of Biological Importance, 515 hectares of Biodiversity Alert Sites, 18 hectares of Regionally Important Geological Sites. When considered collectively the local designations comprise of 1388 hectares, and make up 6.6 % of the borough. The map below shows the location of all Local Wildlife Sites in Newcastle-under-Lyme.

Local Nature Reserves (LNRs)

There are four Local Nature Reserves (LNRs) in Newcastle-under-Lyme totalling 140.86 hectares. These are as follows:

- Pathpool Park LNR – 57.3 hectares (located in Talke & Butt Lane Ward)
- Bateswood LNR – 55.68 hectares (located in Audley Ward)
- Pool Dam Marshes LNR – 10.99 hectares (located in Thistleberry Ward)
- Bradwell Woods LNR – 16.89 hectares (located in Bradwell Ward)

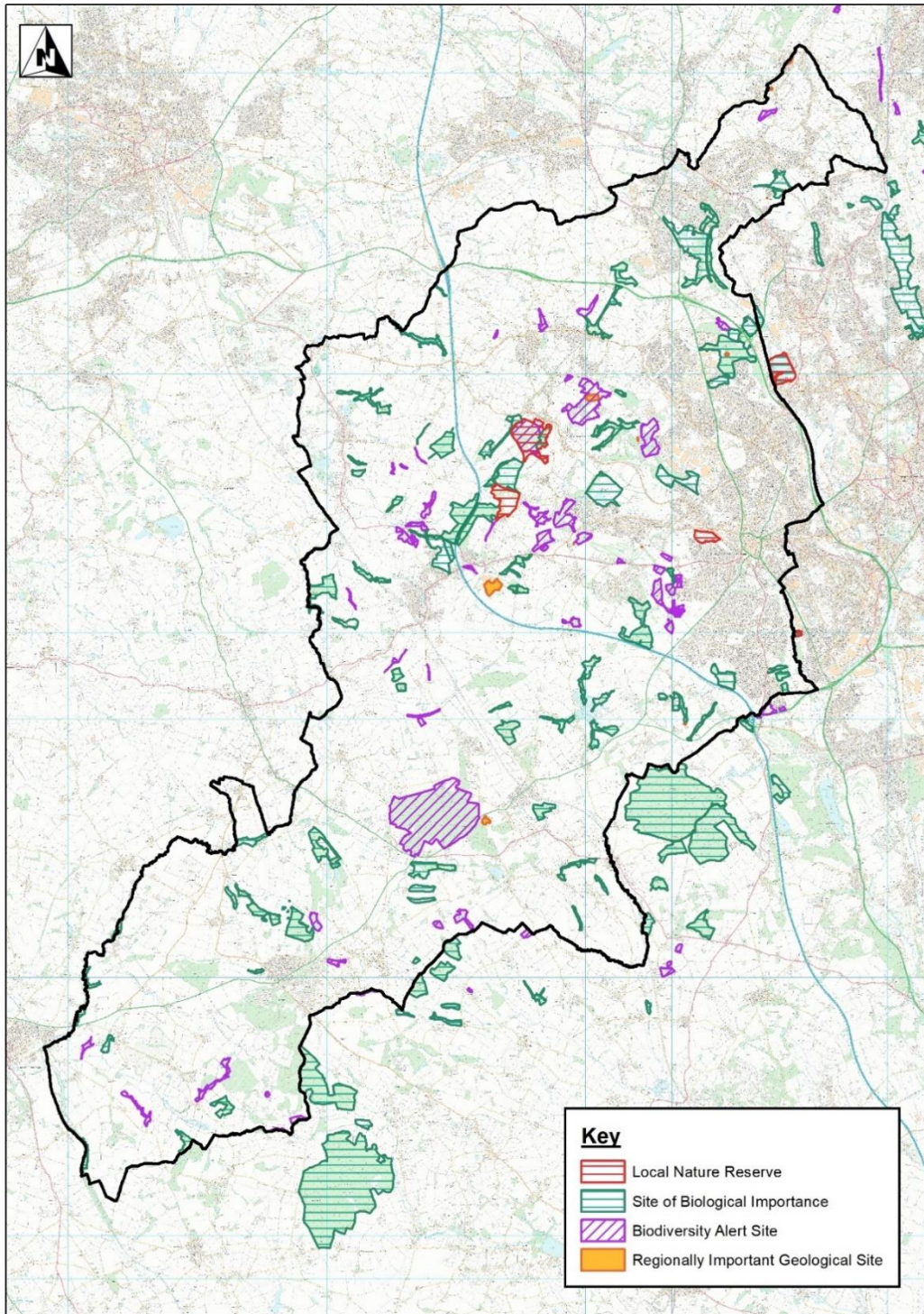


Figure 2 Local Wildlife Sites in Newcastle-under-Lyme

Source: Staffordshire Wildlife Trust

UK BAP Priority Habitats

The UK BAP priority habitats cover a wide range of semi-natural habitat types, and are identified as being the most threatened and requiring conservation under the UK Biodiversity

Action Plan (UK BAP). Newcastle-under-Lyme has 1797.01 hectares of priority habitats identified by Natural England. These comprise of Coastal and Floodplain Grazing Marsh (85.69 hectares), Deciduous Woodland (1490.78 hectares), Semi-Improved Grassland (141.33 hectares), Lowland Dry Acid Grassland (2.28 hectares), Lowland Fens (17.19 hectares), Lowland Heathland (20.03 hectares), Lowland Meadows (8.18 hectares), Lowland Raised Bog (23.89 hectares), Purple Moor Grass and Rush Pasture (2.55 hectares), Reedbeds (1.68 hectares) and Traditional Orchards (3.41 hectares).

Open Space

Previous documents in Newcastle-under-Lyme have used the title 'Green Space'. The National Planning Policy Framework and Planning Practice Guidance makes preferential reference to 'Open Space'. Therefore to be consistent with the NPPF, the term 'Open Space' is now used.

The Newcastle-under-Lyme Open Space Strategy 2017 paper was produced as a review and guide to ensure the Borough Council manages its open space asset base and that the needs of the community are met. The audit completed for the paper includes the 'open space types' listed in table 9. It should be noted that outdoor sport facilities are not part of the Open Space Strategy as they are audited by the Sport England Compliant Playing Pitch Strategy.

Table 9 shows that the borough of Newcastle-under-Lyme is well provided for in terms of open space. The borough has significant higher amounts of natural and semi-natural open space compared to the standard set¹².

Open Space Type	Count	Area (Ha.)	Current Provision (Hectares per 1000 population based on 124,381 pop)	Previous Standard (Hectares per 1000 population)	Proposed Standard (Hectares per 1000 population)
Parks and gardens	35	436.29	3.51	2.35	3.10
Amenity open space	112	128.31	1.03	No standard	0.90
Natural and semi-natural open space	181	1746.22	14.0	3.60	3.60
Designated play spaces for children	81	51.35	0.41	0.76	0.41

¹² Newcastle-under-Lyme Open Space Strategy 2017

and young people					
Allotments	12	13.6	0.11	No Standard	0.15
Green Corridors	16	46.03	0.37	No Standard	No Standard
Outdoor Sport Facilities			No standard		

Table 9 Open Space Standards for Newcastle-under-Lyme (2017)¹³

The three Framework Plans (Newcastle Urban, Kidsgrove Urban and Newcastle Rural) accompanying the Open Space Strategy provide a more detailed understanding of distribution, and the surplus and deficits of specific open space typologies. It should be noted that as the population of the borough grows, localised deficits of open space will increase, and there is a need for new open space to accompany new development, to ensure that the open space provision keeps pace with population growth.

Ancient Woodland

Ancient Woodland is defined as an area of woodland that has existed continuously since the year 1600 in England. Natural England's Ancient Woodland Inventory identifies 112 individual Ancient Woodland sites totalling 707.60 hectares in Newcastle-under-Lyme. The map below shows the locations of Ancient Woodland in Newcastle-under-Lyme.

¹³ Newcastle-under-Lyme Open Space Strategy 2017

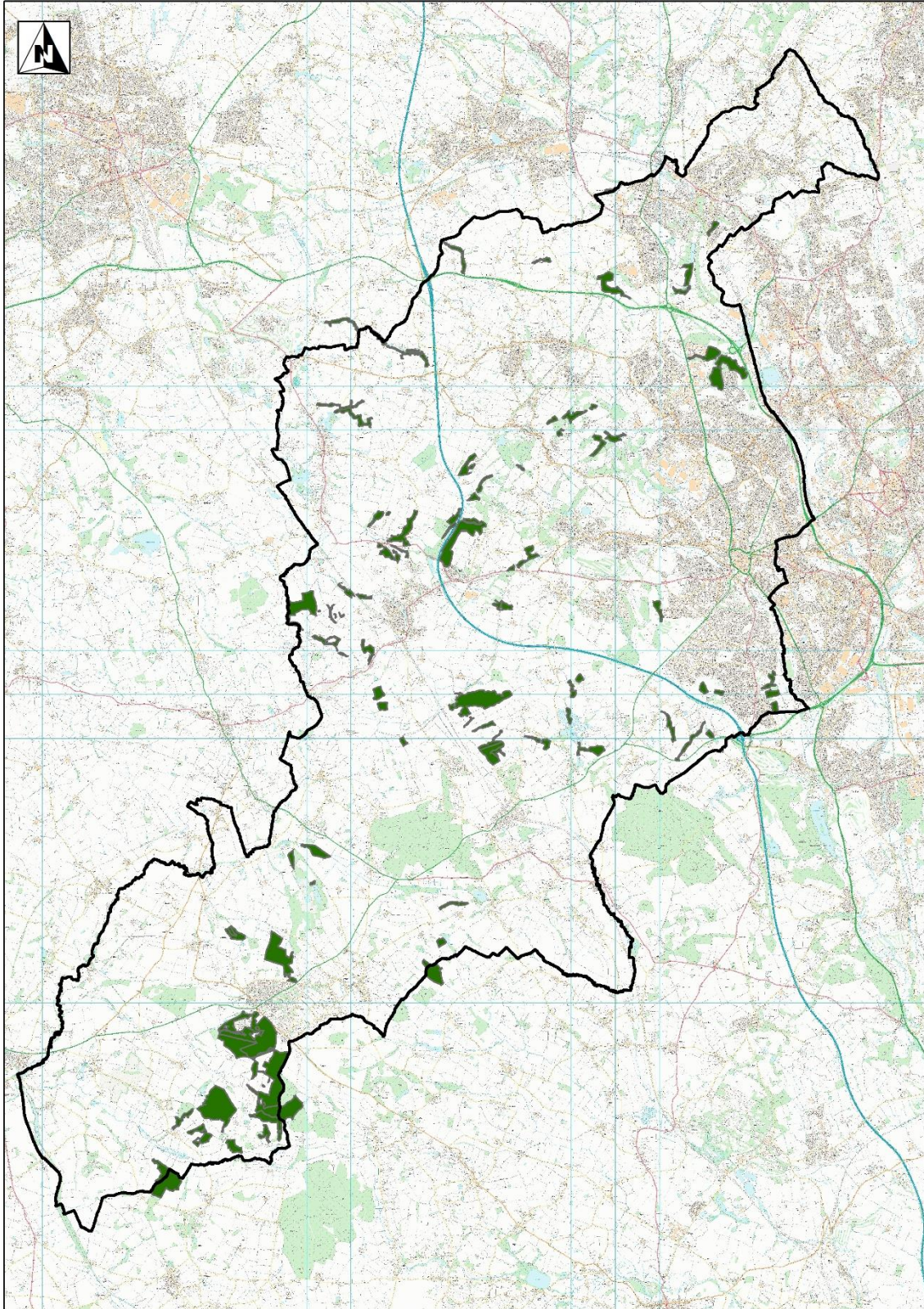


Figure 3 Ancient Woodland in Newcastle-under-Lyme

Source: Natural England

Soil and Agricultural Land Classification

The agricultural land classification system identifies five grades of land. These are as follows:

Grade 1 – excellent quality agricultural land

Grade 2 – very good quality agricultural land

Grade 3 – good to moderate quality agricultural land

 Subgrade 3a – good quality agricultural land

 Subgrade 3b – moderate quality agricultural land

Grade 4 – Poor quality agricultural land

Grade 5 – very poor quality agricultural land

The best and most versatile land is defined as Grades 1, 2 and 3a and is the land which is considered the most flexible, productive and efficient in response to inputs. One of the main factors in assessing this grade relates to soil characteristics. The north east of Newcastle-under-Lyme borough is predominantly urban, reflecting the built up character of Newcastle-under-Lyme and Kidsgrove. The majority of agricultural land in the borough's rural area is classified as Grade 3. There are also areas of Grade 4 land to the north east of the borough and some areas of Grade 2 to the south west. There is no Grade 5 land in the Newcastle-under-Lyme borough. The map below shows the agricultural grades across Newcastle-under-Lyme.

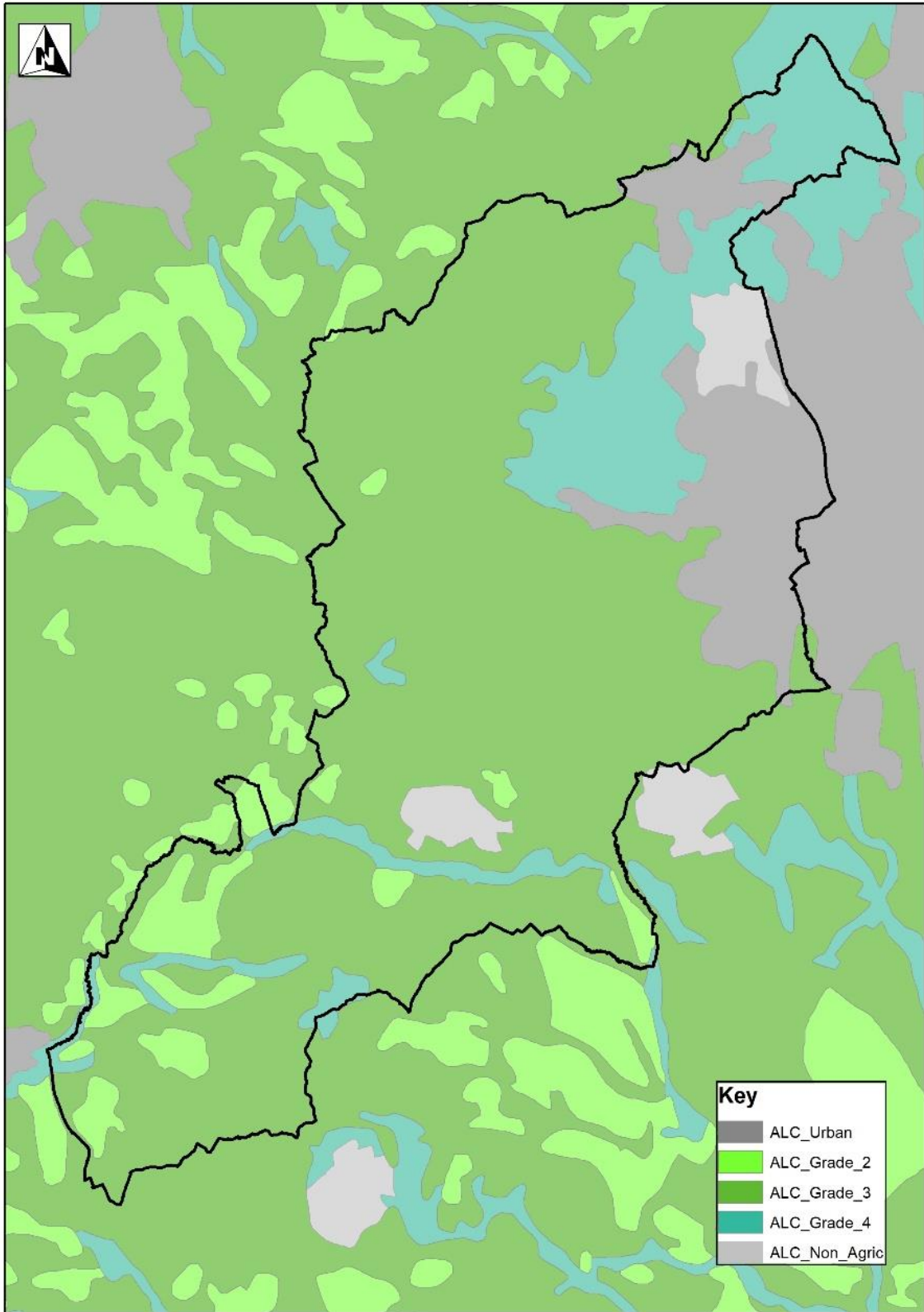


Figure 4 Agricultural Land Classification Grades across Newcastle-under-Lyme

Source: Natural England

Contaminated Land

Newcastle-under-Lyme Borough Council holds a Public Register of contaminated land. The list contains sites which have been determined to be contaminated within the statutory definition of being contaminated, and a Remediation Notice, Statement or Declaration has been issued.

Water

The Environment Agency holds data on flood risk from rivers to surface water. Flood risk is a combination of the probability and the potential consequences of flooding from all water sources including rivers, sea, rainfall, ground and surface water, sewers, drainage systems, reservoirs, canals, lakes and other artificial sources. The Environment Agency classifies the likelihood of flooding in zones. These are as follows:

- Flood Zone 1 - land assessed as having a less than 1 in 1,000 annual probability of river or sea flooding (<0.1%).
- Flood Zone 2 - land assessed as having between a 1 in 100 and 1 in 1,000 annual probability of river flooding (1% – 0.1%), or between a 1 in 200 and 1 in 1,000 annual probability of sea flooding (0.5% – 0.1%) in any year.
- Flood Zone 3 - land assessed as having a 1 in 100 or greater annual probability of river flooding (>1%), or a 1 in 200 or greater annual probability of flooding from the sea (>0.5%) in any year.

The maps below show areas of Flood Zones 2 and 3 in Newcastle-under-Lyme.

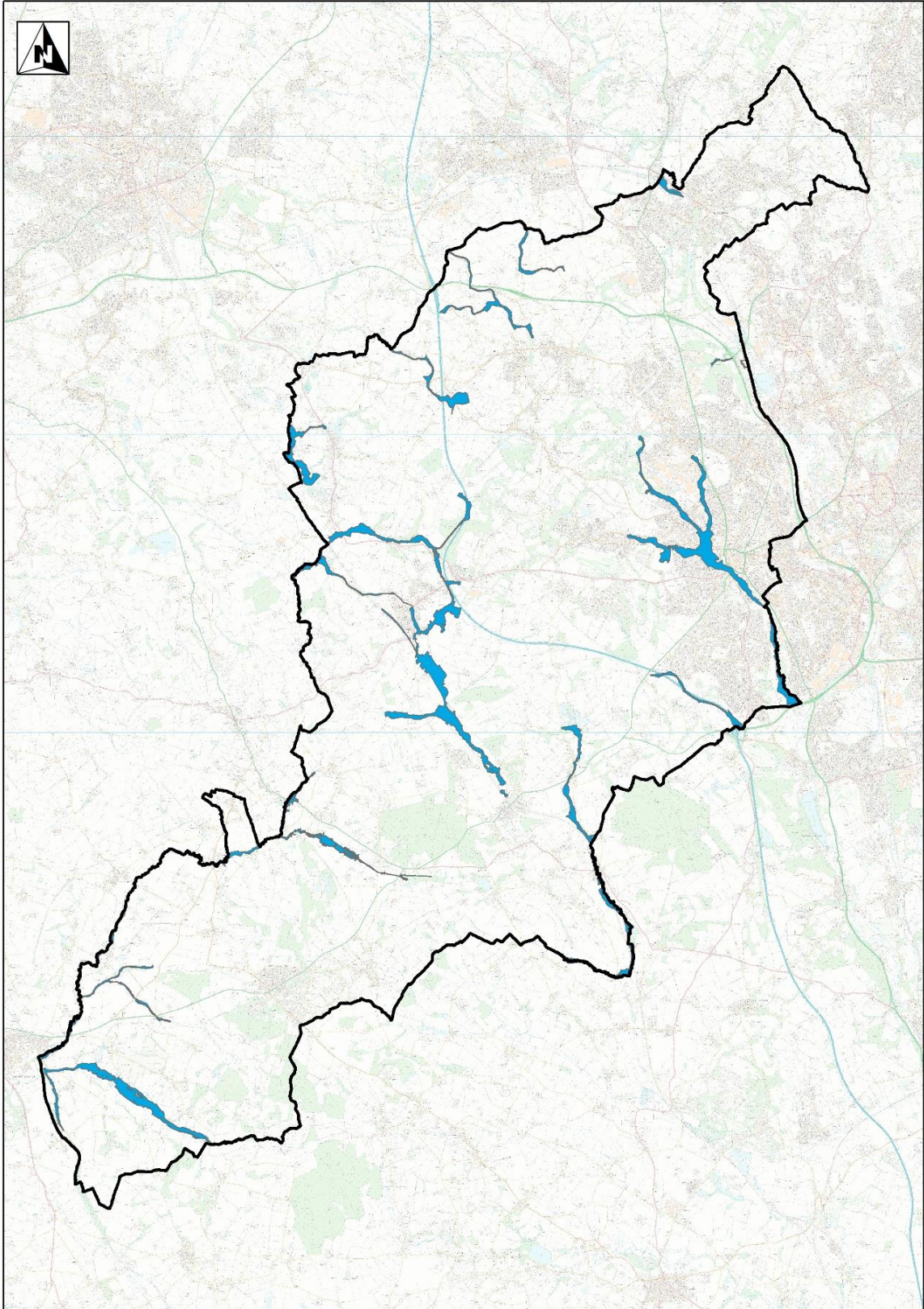


Figure 5 Flood Zone 2 in Newcastle-under-Lyme

Source: Environment Agency

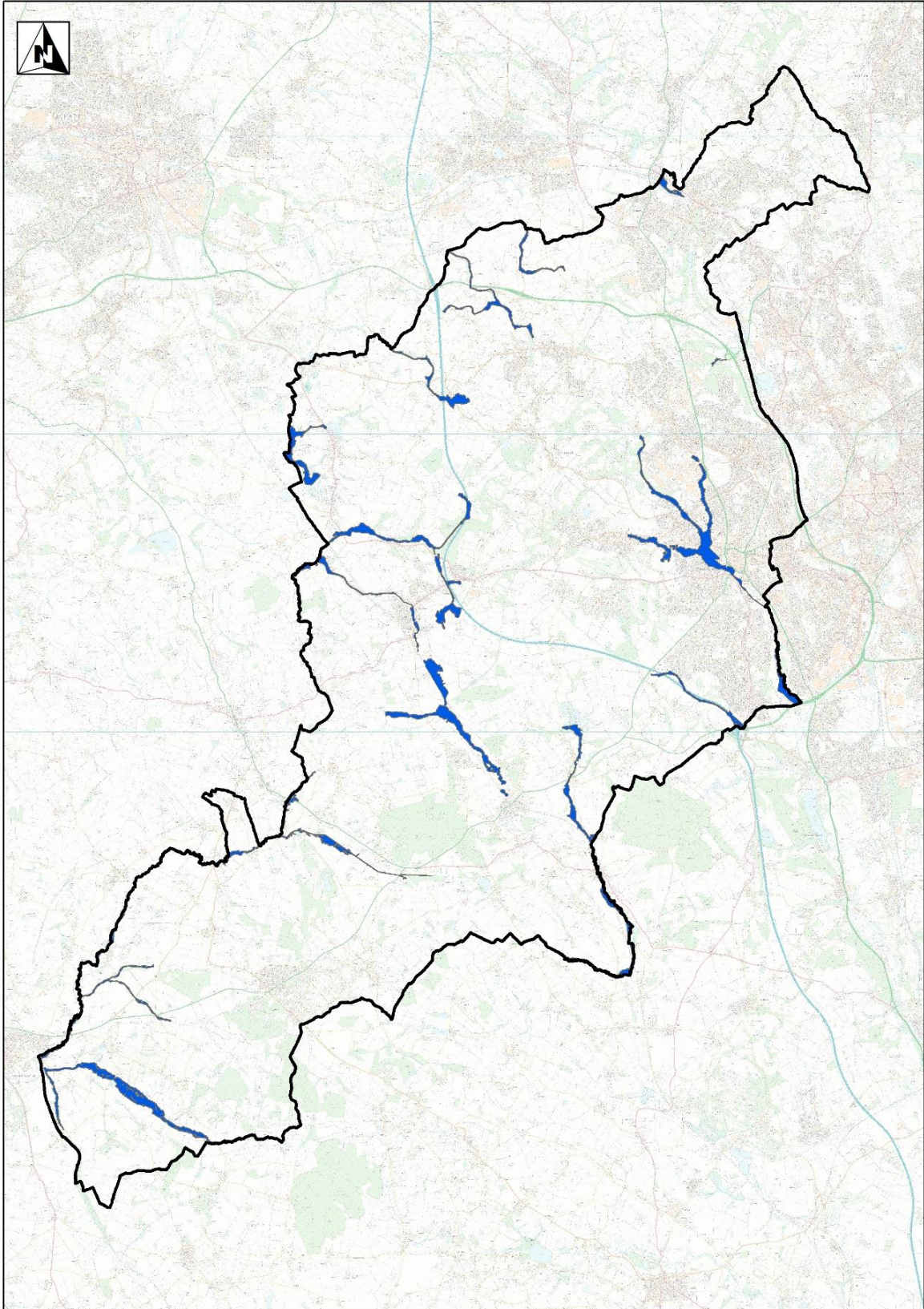


Figure 6 Flood Zone 3 in Newcastle-under-Lyme

Source: Environment Agency

The Newcastle-under-Lyme Level 1 Strategic Flood Risk Assessment 2019 provides a strategic assessment of risk from all sources of flooding in the borough. The assessment recognises surface water and fluvial flooding as the prominent source of flooding. The borough's primary fluvial flood risk is along the Lyme Brook, a tributary of the River Trent. This presents a fluvial flood risk, primarily, to the Town Centre, including Brook Lane and the Poolfields area. There is also a risk of flooding from the Lyme Brook in the villages of Silverdale, Knutton and Cross Heath. To the south of the Town Centre, Clayton is also at risk from flooding from Lyme Brook. The River Lea presents a flood risk to the villages of Madeley and Madeley Heath. Smaller tributaries and brooks in the borough including Checkley Brook, Coal Brook, Mere Gutter (associated with Betley Mere), Dean Brook, Valley Brook, Meece Brook and Fowlea Brook have localised flooding in their immediate areas.

Surface Water

Surface water runoff (or pluvial flooding) typically occurs from intense rainfall, i.e. thunderstorms, which can overwhelm the drainage network not designed to cope with extreme storms. Surface water flooding can occur as a result of drain blockages, sewers being at capacity or high water levels in watercourses that cause local drainage networks to back up. The Environment Agency identifies three levels of surface water flood risk which are as follows:

High - each year, the area has a chance of flooding of greater than 1 in 30

Medium - each year, the area has a chance of flooding of between 1 in 100

Low - each year, the area has a chance of flooding of between 1 in 1000

The maps below show the levels of surface water flood risk in Newcastle-under-Lyme.

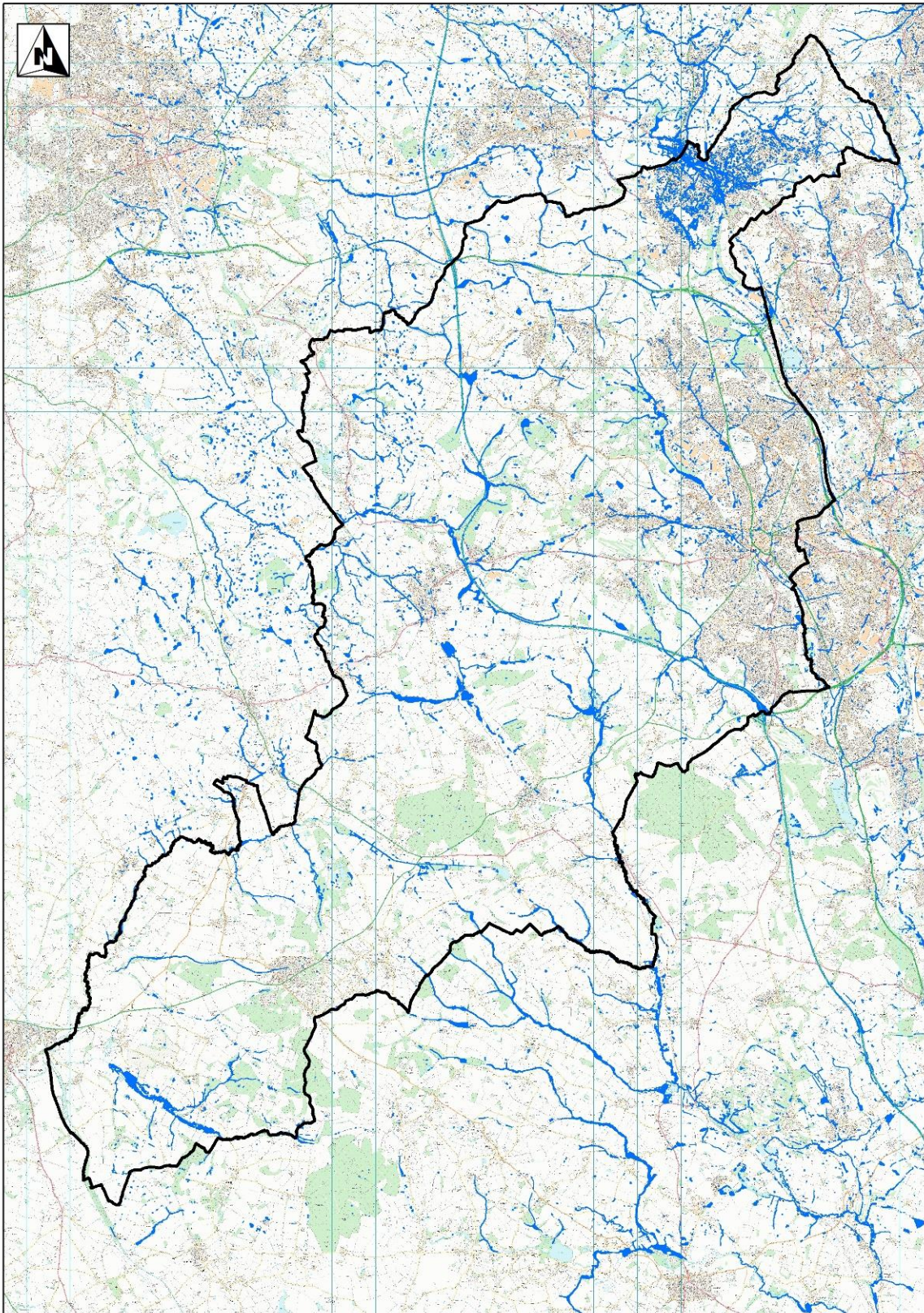


Figure 7 High Level Flood Risk, 1 in 30 Years, Newcastle-under-Lyme

Source: Environment Agency

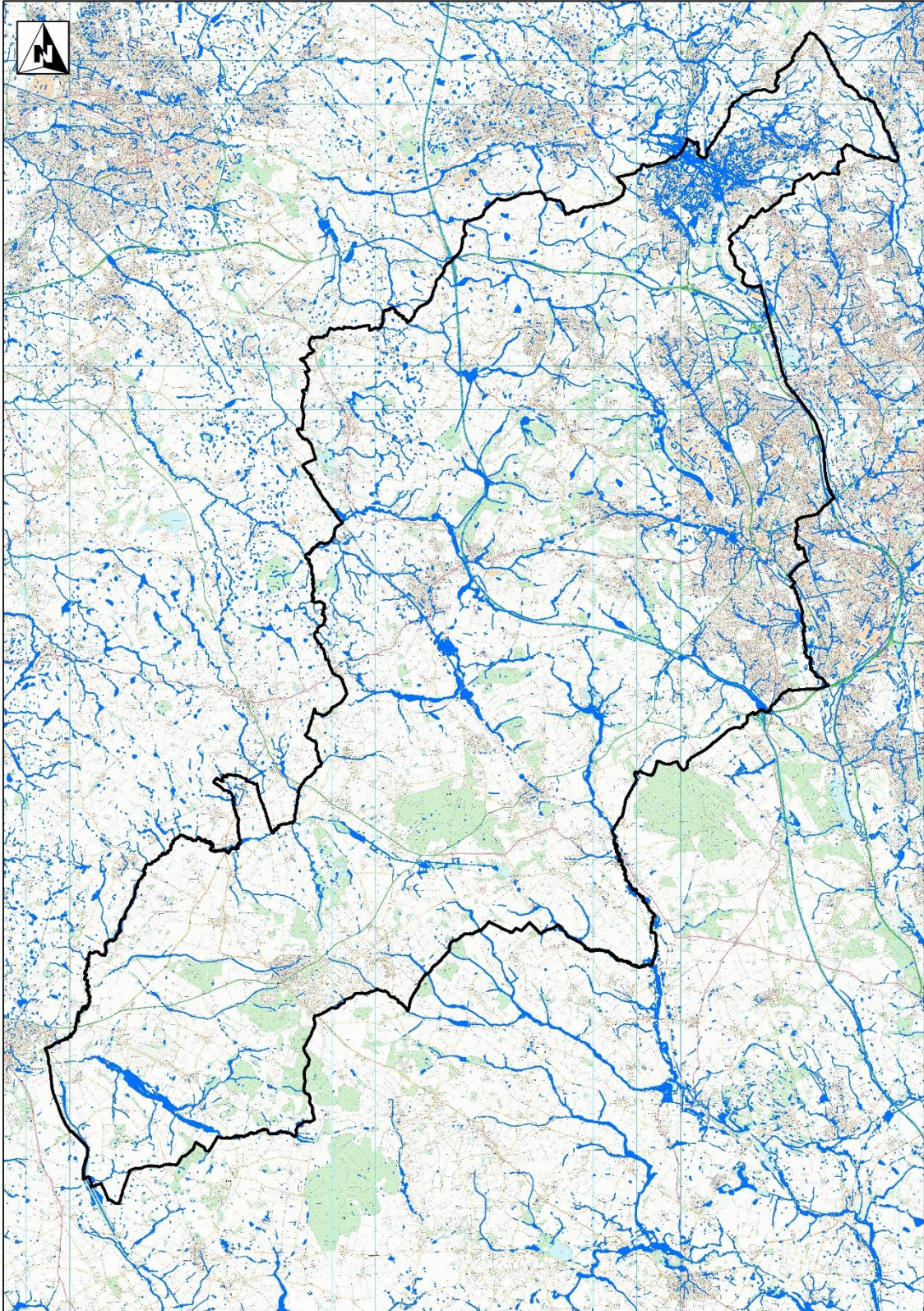


Figure 8 Medium Level Flood Risk, 1 in 100 Years, Newcastle-under-Lyme

Source: Environment Agency

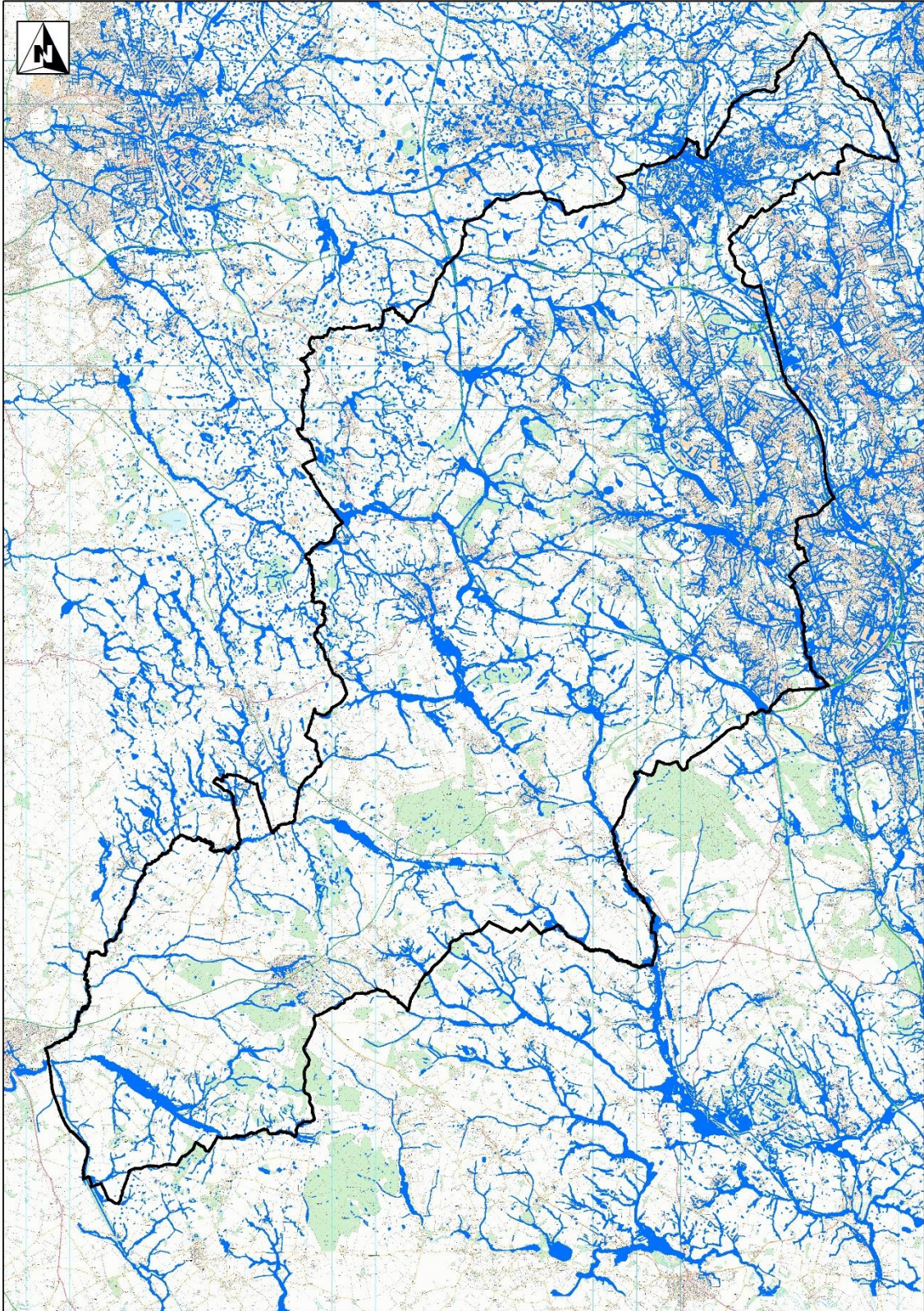


Figure 9 Medium Level Flood Risk, 1 in 1000 Years, Newcastle-under-Lyme

Source: Environment Agency

The Newcastle-under-Lyme Level 1 Strategic Flood Risk Assessment identifies surface water flood risk in the borough, predominantly within the urban areas of Newcastle and Kidsgrove as a result of rapid urbanisation, and where smaller watercourses were culverted, and in some cases, built over. The urban area of Newcastle and Silverdale was recognised in the local FRM Strategy as being one of the top ten urban areas at risk of surface water flooding in the county, with an estimated 632 properties at risk. Kidsgrove has known issues with the capacity of the sewer network. Areas that have seen the highest occurrences of sewer flooding are the most densely populated, in particular Kidsgrove, Talke, Audley and Bignall End. Rural areas that have been impacted by sewer flooding include Madeley and Betley.

Water Quality

The Newcastle-under-Lyme Water Cycle Study 2020: Phase 1 shows the Water Framework Directive status of waterbodies across Newcastle-under-Lyme. The map below shows the status of Coal Brook, Loggerheads Brook (Poor), River Tern (Moderate), Meece Brook (Bad), River Lea (Bad), Checkley Brook (Good), Lyme Brook (Poor), Fowlea Brook (Moderate), Valley Brook (Poor) and the Trent and Mersey Canal (Good). The study shows that the status of waterbodies across Newcastle-under-Lyme mostly ranges between poor and moderate.

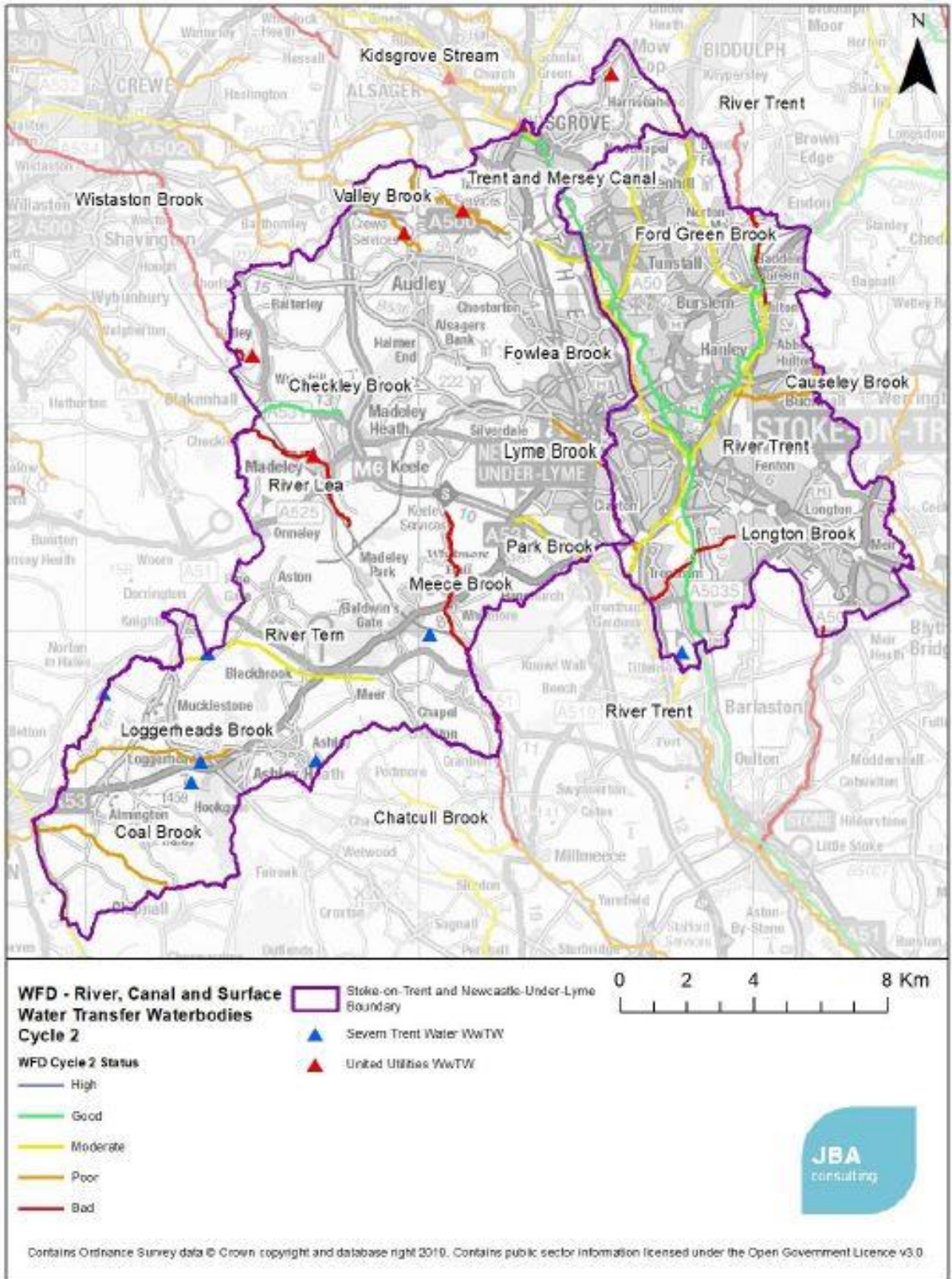


Figure 10 Water Framework Directive status of waterbodies across Newcastle-under-Lyme

Source: Newcastle-under-Lyme Water Cycle Study 2020: Phase 1

Newcastle-under-Lyme falls within a Nitrate Vulnerable Zone (NVZ). NVZs are designated areas of land that drain into waters polluted by nitrates from agricultural sources. Types of polluted waters include the following:

- **Surface Waters** - areas of land that drain into a freshwater water body which has or could have is action is not taken, a nitrate concentration greater than 50mg/l
- **Groundwater** - water held underground in the soil or in pores and crevices in rock, which has or could have if action is not taken, a nitrate concentration greater than 50mg/l
- **Eutrophic Waters** - bodies of water, mainly lakes and estuaries, that are or may become enriched by nitrogen compounds which cause a growth of algae and other plant life that unbalances the quality of the water and to organisms present in the water

Water Extraction

The Environment Agency has a CAMS: Staffordshire Trent Valley Abstraction Licensing Strategy which was published in 2013. This provides information on how existing abstraction is regulated and whether water is available for further extraction within the Trent Valley river basin. The strategy identifies that water flow rates in the Trent Valley within the plan area, (upstream of Strongford) are sufficient to allow licenses to be made available for water extraction for at least 50% of the time. It also notes however that the Meece Brook, which flows through Newcastle's rural area, has deficits in the water required to support the environment and so it is currently closed to further abstraction. The Environment Agency have advised that the Abstraction Licensing Strategy for this area is due to be updated. As a result the resource availability could change in future.

Groundwater Quality

The plan area for the new Local Plan covers several Water Framework Directive Groundwater Bodies. This makes it difficult to provide a general picture of the area. However, the Environment Agency has advised that the 'Staffordshire Trent Valley – Coal Measures Stoke' (GB40402G304600) Groundwater Body covers most of Newcastle-under-Lyme. Therefore, the SA Scoping Report should refer to data from the Humber, North Western District and Severn River Basin Management Plans (RBMP) in relation to this water body. As of 2019 the overall status of the groundwater body was 'good', with the quantitative status 'good' and the chemical status 'good'¹⁴

¹⁴ <https://environment.data.gov.uk/catchment-planning/WaterBody/GB40402G304600>

Air

Air quality has been monitored in the borough of Newcastle-under-Lyme over the last twenty years, by using Nitrogen dioxide diffusion tubes and an automatic monitoring station, which monitors real time concentrations of Nitrogen dioxide (NO₂) in the air. This substance is monitored because it is found in vehicle exhaust fumes, which is the main source of pollution within the Borough. Furthermore the council has been able to identify that NO₂ emissions from road traffic exceed the limits set down in law, in four areas of the borough.

In 2015 four geographical areas of the borough were declared as Air Quality Management Areas (AQMA) due to exceedances of objective levels of nitrogen dioxide. These areas include Newcastle Town Centre, Maybank, Kidsgrove and Little Madeley. With the input of other sectors (i.e. Highways England, Staffordshire County Council) Air Quality Action Plans (AQAP) for each AQMA are now in place to address the different ways in which levels of pollution can be reduced by managing traffic more efficiently, and encouraging walking, cycling, and the use of public transport across the borough. Monitoring of congestion across the key district transport routes has been recognised as a key indicator by Staffordshire County Council, and may be an important indicator for future impact on local air quality.

Since declaring the AQMA's no new sources of emissions have been identified. The latest Air Quality Annual Status Report 2019 confirmed that the overall Nitrogen dioxide levels in the borough are falling, with the majority of monitoring sites showing annual mean concentrations below the annual mean objective. However, work needs to be done to ensure that further developments, and changes to the road networks across the Borough do not lead to an increase in the annual NO₂ concentration above the annual mean objective of 40µg/m³.

	2014/15	2015/16	2016/17
Newcastle-under-Lyme	6.2%	6.1%	6.2%
England	6.0%	5.9%	5.9%

Table 10 Prevalence of asthma in Newcastle-under-Lyme 2014-2017

	2014/15	2015/16	2016/17
Newcastle-under-Lyme	2.3%	2.4%	2.4%
England	1.8%	1.9%	1.9%

Table 11 Prevalence of chronic obstructive pulmonary disease in Newcastle-under-Lyme 2014-2017

	2014/15	2015/16	2016/17
Newcastle-under-Lyme	3.7%	3.6%	3.6%
England	3.2%	3.2%	3.2%

Table 12 Prevalence of coronary heart disease in Newcastle-under-Lyme 2014-2017

Tables 10, 11 & 12 shows that Newcastle-under-Lyme is above the England average for cases of asthma, chronic obstructive pulmonary disease and coronary heart disease. These diseases are considered to be indicators of poor air quality

	2011	2012	2013	2014	2015	2016
Newcastle-under-Lyme	4.8%	4.6%	4.9%	4.7%	4.2%	4.7%
England	5.4%	5.1%	5.3%	5.1%	4.7%	5.3%

Table 13 Mortality attributable to air pollution in Newcastle-under-Lyme 2011-2016

Table 13 shows approximately 5% of Newcastle’s mortality is attributable to air pollution. Whilst Newcastle-under-Lyme’s percentages are marginally below the country average, they are considered to be similar to the national picture¹⁵.

Climate

Through the production of a series of Synthesis Reports the Intergovernmental Panel on Climate Change (IPCC) provide a comprehensive assessment on climate change, its implications, potential future risks, and options for adaptation and mitigation. The reports confirm that human influence on the climate system is growing with impacts observed across all continents and oceans. The Intergovernmental Panel on Climate Change 5th Assessment Report identifies changes in extreme weather and climate events, with decreasing cold temperatures, increasing warm temperatures, increasing extreme high sea levels and increasing number of heavy precipitation events.

The Baseline Report that forms part of the Staffordshire Climate Study 2020 compliments the trends outlined within the IPCC 5TH Assessment Report. The Baseline Report anticipates that Staffordshire will move towards warmer wetter winters, hotter drier summers, with an increase in the frequency and intensity of extreme events. Furthermore, Staffordshire is exposed to a number of climate related risks, particularly flooding. The Baseline Report goes on to describe the levels of fuel consumption and emission of Greenhouse Gases (GHG) by sector within Newcastle-under-Lyme. As of 2018, the following was observed:

- Largest proportion of fuel consumed was petroleum products (44.5%), with gas and electricity accounting for 38.6% and 14.7%. Other fuels, including bioenergy & waste, coal, and manufactured fuels make up the remaining 2.2%.

¹⁵ Newcastle-under-Lyme borough Council Air Quality Action Plan 2019-2024

- Road transport sector accounts for the highest proportion of fuel consumption in Newcastle-under-Lyme (41%), followed by the domestic and industrial & commercial sectors (31.5% and 26.5%). Within the domestic sector, approximately 73.7% of fuel consumed is gas and 19% is electricity. In the industrial & commercial sector, approximately 58.2% of fuel consumed is gas and 32.9% is electricity.
- Largest portion of emissions result from petrol and diesel used in road transport (38%), followed by residential buildings (27%). Within the residential sector, the use of natural gas (e.g. for heating, hot water and cooking) accounts for the majority of GHG emissions.
- Non-domestic buildings collectively account for around 25% of total emissions.
- Motorways represent around 45% of road transport emissions for Newcastle-under-Lyme, or around 17% of the total emissions.

It is no secret that fuel consumption and the greenhouse gas emissions they generate are having an impact on our climate, and measures must be taken towards climate change mitigation and adaptation. In 2019 Newcastle-under-Lyme Borough Council declared a Climate Emergency with the aim of making Newcastle-under-Lyme a carbon-neutral borough by 2030.

Cultural Heritage

Listed Buildings and Structures

There are 381 listed buildings and structures in Newcastle-under-Lyme. Of these, 3 are Grade I, 25 are Grade II* and 353 are Grade II¹⁶.

Newcastle-under-Lyme Borough Council also hold a Register of Locally Important Buildings and Structures. The register is generally used to raise awareness in the community of the local heritage and to try and protect it from harmful change and demolition¹⁷.

Scheduled Ancient Monuments

Scheduled Ancient Monuments are of national importance and have legal protection under the ancient Monuments and Archaeological Areas Act 1979.

There are 13 Scheduled Ancient Monuments in Newcastle-under-Lyme. These are:

- Motte and Bailey, Castle Hill;

¹⁶ <https://www.newcastle-staffs.gov.uk/all-services/planning/conservation-and-heritage/historic-buildings-and-structures>

¹⁷ <https://www.newcastle-staffs.gov.uk/all-services/planning/conservation-and-heritage/register-locally-important-buildings-and-structures>

- Audley's Cross, Tyrley;
- 'Auctioneers Mound' near Ashley Church;
- Hales Roman Villa & pre-Roman structures;
- 'Devil's Ring and Finger' whirl stones, near Oakley Hall;
- Moated Site, Willoughbridge Park;
- Heighley Castle;
- Old Madeley Manor;
- Berth Hill Camp;
- Bowl Barrow, Maer Hills;
- Moated Site, Lea Head Manor;
- Castle Motte, silverdale Road;
- Springwood Blast Furnace¹⁸.

Registered Parks and Gardens

There are 2 registered parks in Newcastle-under-Lyme. These are:

- Keele Historic Parks and Gardens – Grade II;
- Maer Historic Parks and Gardens – Grade II.

“The Register was established in 1983 and confers special statutory protection for these sites and gives them a Grade I, II* or II grading like Listed Buildings, reflecting their national historic interest. The purpose of the Register is to celebrate designed landscapes. Registration is a material consideration in the planning process. Local Planning Authorities must consider the impact of a proposal on the special character of the area”¹⁹.

Conservation Areas

There are currently 21 conservation areas within the borough of Newcastle-under-Lyme, none of which to date have been identified as being at risk. Of the 21 Conservation Areas, the Borough Council has produced 11 Conservation Area Appraisals & Management Plans which define the special interest of the conservation area that merits its designation and describes & evaluates the contribution made by the different features of its character and appearance.

¹⁸ <https://www.newcastle-staffs.gov.uk/all-services/planning/conservation-and-heritage/historic-buildings-and-structures>

¹⁹ <https://www.newcastle-staffs.gov.uk/all-services/planning/conservation-and-heritage/registered-parks-and-gardens>

An indicative programme for the preparation of appraisals and management plans over the period to 2030 has also been produced by the Borough Council.

12 of these conservation areas are subject to Article 4 Direction. Article 4 Direction allows the council to “remove and make certain restrictions on the kind of alterations allowed, depending on how it might affect the area’s character. This affects things like porches, changing historic doors and windows and other distinctive architectural features and removing or putting up walls, gates or fences”.

Conservation areas which are subject to Article 4 Directions are marked with an * below.

- Audley * (designated 1976, extended 2013);
- Basford * (designated 2006, extended 2007);
- Betley * (designated 1970, extended 2008);
- The Brampton * (designated 1984, extended 2016);
- Butterton * (designated 2006);
- Clayton (designated 1992);
- Keele * (designated 1989, extended June 2018);
- Keele Hall (designated 1993);
- Kidsgrove (designated 1997);
- Madeley * (designated 1972, extended 2012);
- Maer * (designated 1970, extended 2019);
- Mucklestone (designated 1977);
- Newcastle-under-Lyme (designated 1973, extended 2000 and 2008);
- Shropshire Union Canal (designated 1984);
- Silverdale (designated 1993);
- Subbs Walk * (designated 1993, reviewed 2016);
- Talke (designated 2000);
- Trent and Mersey Canal (designated 1988);
- Watlands Park * (designated 2016);
- Whitmore * (designated 1971);
- Wolstanton * (designated 1993, extended 1997)²⁰.

²⁰ <https://www.newcastle-staffs.gov.uk/all-services/planning/conservation-and-heritage/conservation-areas>

Local Listing

Local heritage lists are compiled by local authorities to identify historic buildings and structures which have not been given a formal designation by Historic England, but are considered to be of significant local importance, enough to have material consideration in the planning process.

Newcastle-under-Lyme's Register of Locally Important Buildings and Structures was last updated in 2020 and includes 135 buildings or structures. This is an increase of 34 new additions since the last review took place in 2014. The criteria used for determining whether a building or structure should be added to the register are; authenticity, architectural interest, historic interest, visual importance and community value²¹.

Landscape

The area that the new Local Plan will cover falls within two national landscape character areas; Shropshire, Cheshire and Staffordshire Plain (NCA 61), and The Potteries and Churnet Valley (NCA 64). Natural England has published National Character Area profiles for both of these areas.

Staffordshire County Council has adopted a Planning for Landscape Change Supplementary Planning Guidance document. This is intended to guide decisions which may affect the conservation, enhancement and restoration of rural landscapes in the county. This document was adopted in 2001 and is intended to be updated and replaced by new guidance soon. When adopted, this new guidance will be used to inform assessments of potential impact on the landscape.

Social

Population

Tables 14 & 15 below provide information on the population of Newcastle-under-Lyme.

	Population Males	Population Females	Population Total
Newcastle-under-Lyme	61,206	62,665	123,871

Table 14: Population by gender

Age Groups	Newcastle-under-Lyme
0-4	5.1%
5-7	3.2%

²¹ <https://www.newcastle-staffs.gov.uk/all-services/planning/conservation-and-heritage/register-locally-important-buildings-and-structures>

8-9	1.9%
10-14	5.6%
15	1.1%
Below 16 years of age	16.9%
16-17	2.4%
18-19	3.4%
20-24	7.7%
16-24	13.5%
25-29	5.6%
30-44	18.8%
45-59	20.2%
60-64	6.8%
25-64	51.4%
65-74	9.7%
75-84	6.2%
85-89	1.6%
Age 90 and over	0.7%

Table 15: Population by age-group

Human Health

Life expectancy and mortality data enable us to monitor how Newcastle-under-Lyme is developing as a healthy city. As it is difficult to assess which aspects of our populations' health are improving or declining, lifestyle choices which can be influenced by the surrounding environment and wider determinants of health have been considered below.

Life Expectancy

Life expectancy at birth provides an estimate of the number of years a new-born baby would live were they to experience age-specific mortality rates for that time period, in a particular locality throughout their life. It is important to note that these figures do not estimate the number of years a baby born in the area in each time period would actually expect to live nor can it be used to guide remaining years of life.

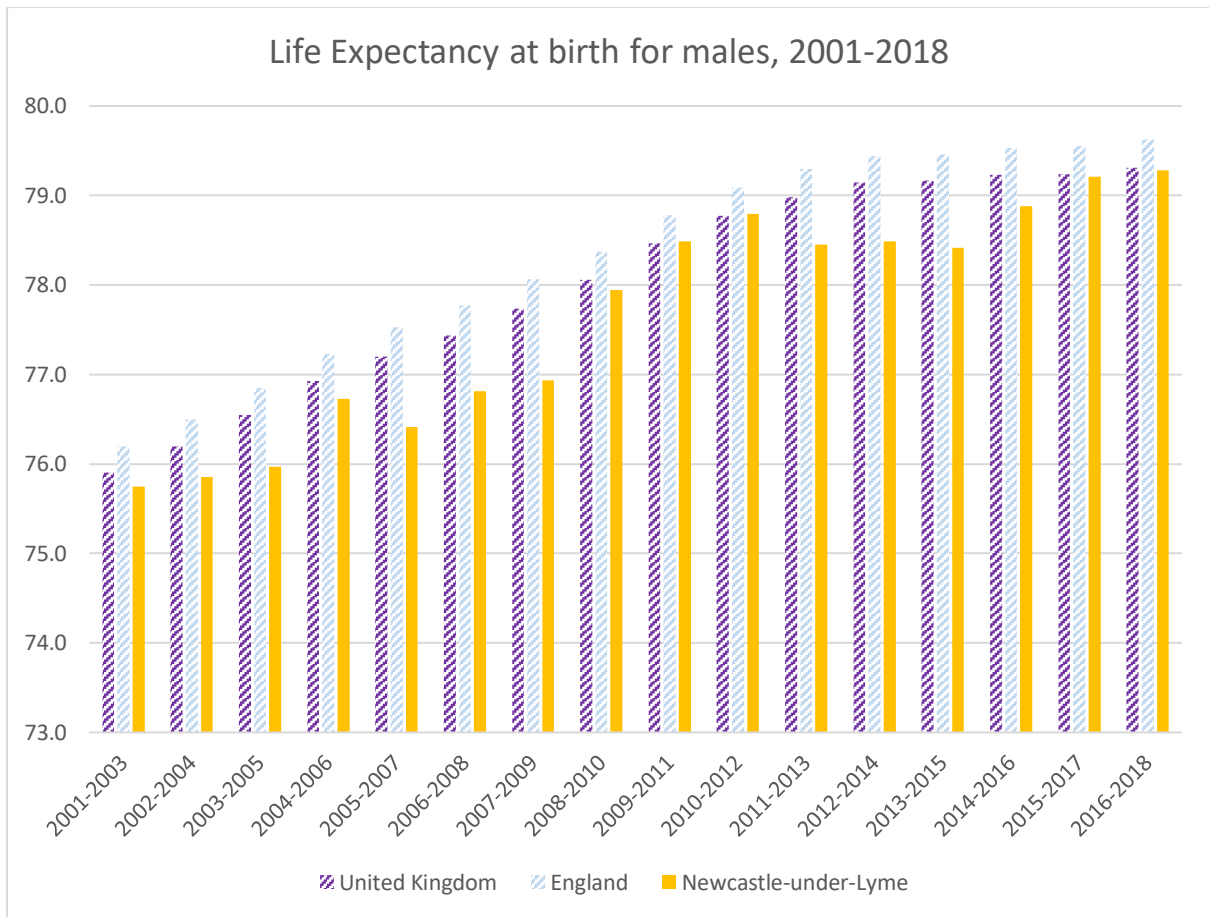


Figure 11 Office for National Statistics, 2019

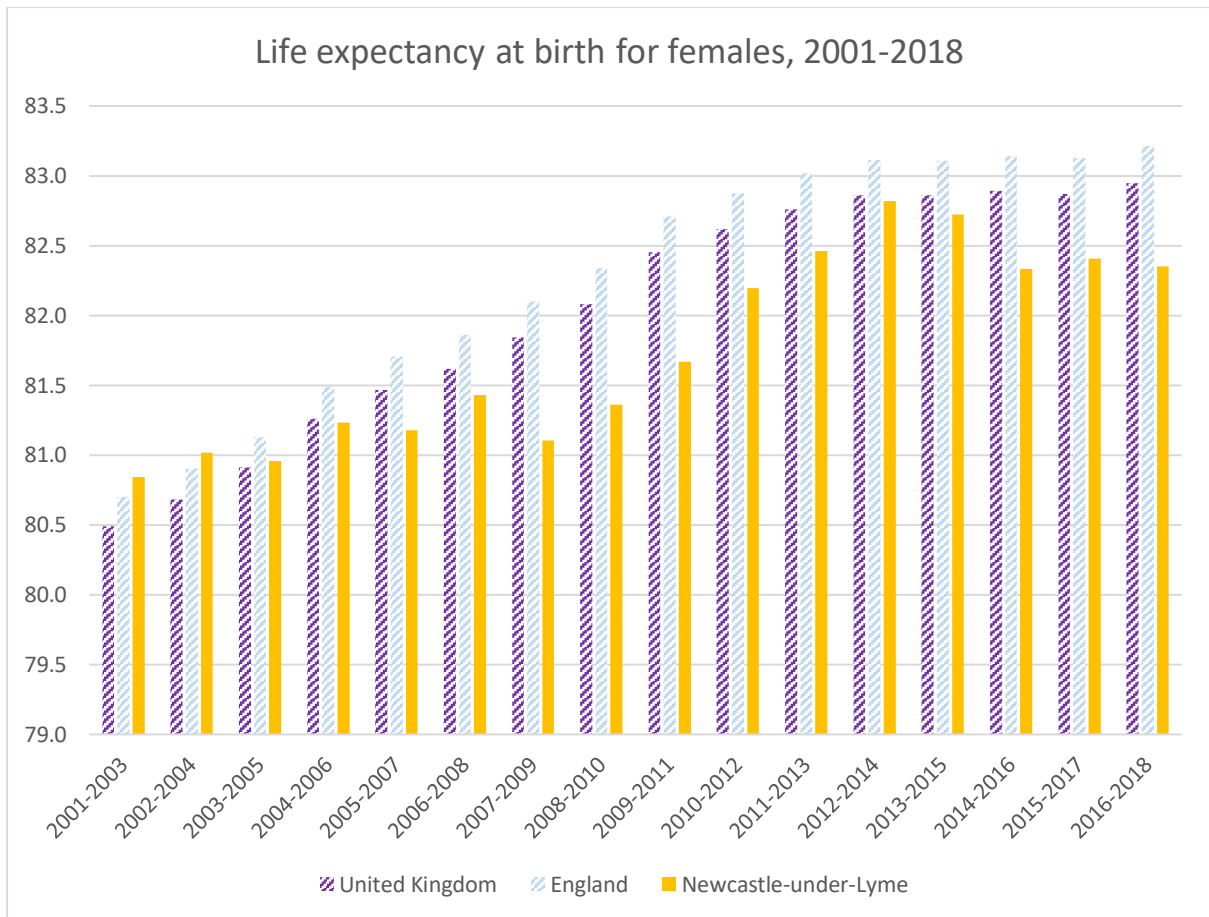


Figure 12 Office for National Statistics, 2019

Figures 11 and 12 show that the life expectancy for both males and females at birth is lower in Newcastle-under-Lyme in comparison to England and the United Kingdom. Whilst figure 11 shows that the difference between the borough and the country is closing for males (-0.3yrs) in 2018, figure 12 shows that the gap is much larger for females. Figure 12 shows that the life expectancy for females in the borough is 0.8 years lower than England.

Mortality

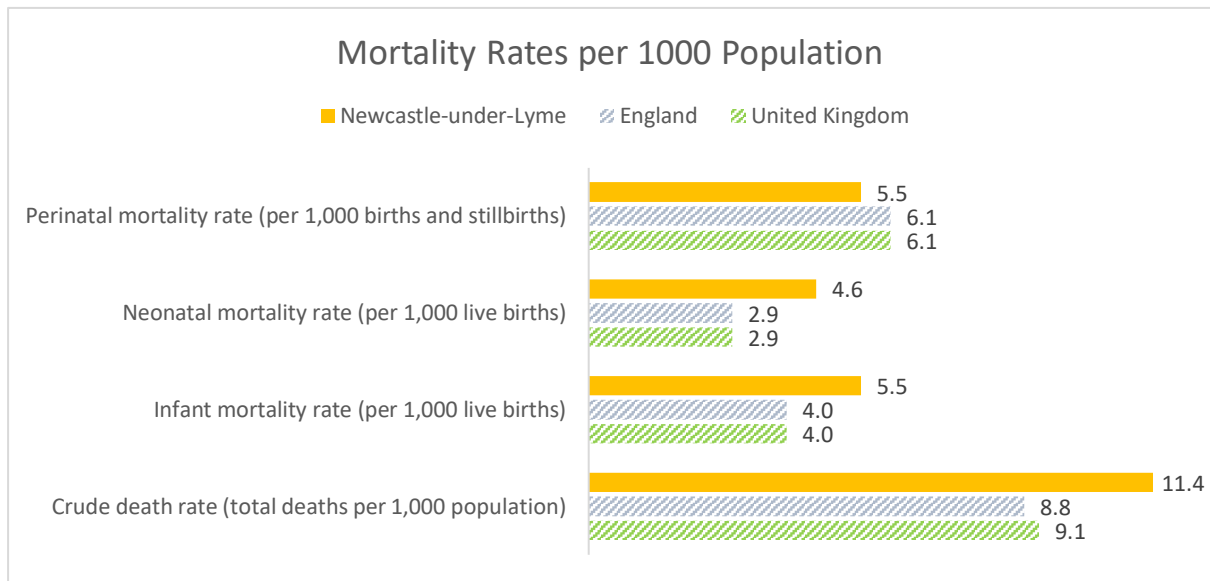


Figure 13 Office for National Statistics, 2021

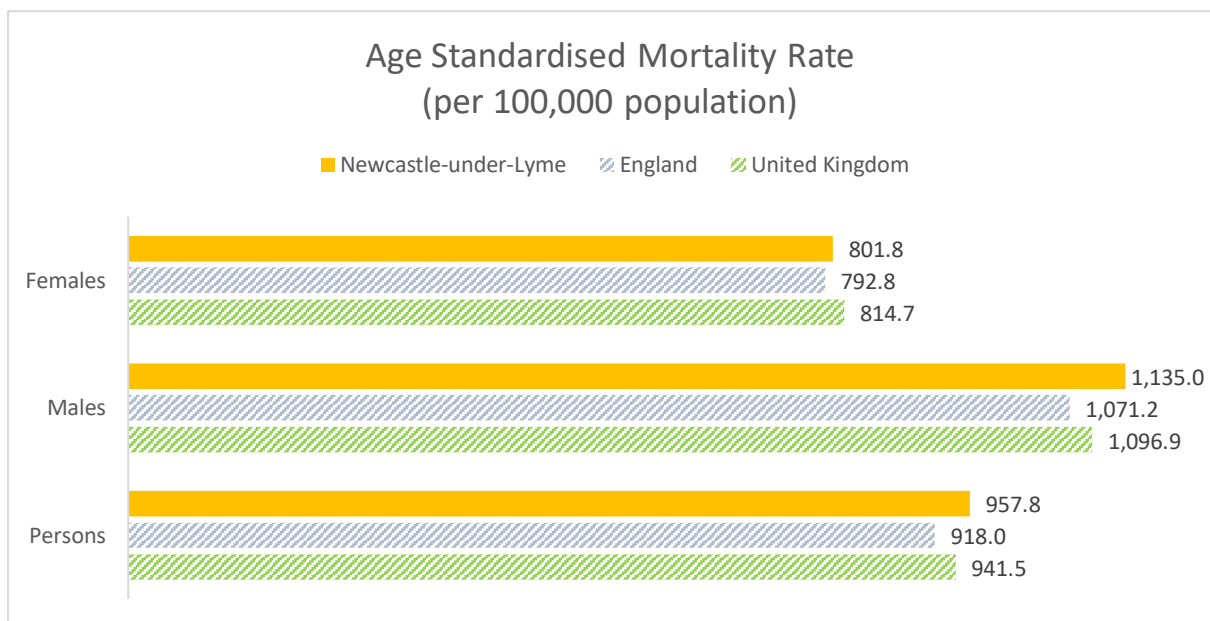


Figure 14 Office for National Statistics, 2021

Figure 13 shows that the neonatal, infant and crude mortality rate is higher in Newcastle-under-Lyme compared to England and the United Kingdom. However, the perinatal mortality rate is lower in the borough. Figure 14 also shows that whilst the male mortality rate is higher in the borough than in England and the United Kingdom, the female mortality rate in the

borough is lower. However, the average for both males and females is higher compared to the country.

Lifestyle Indicators

Physical Activity

Regular physical activity provides a range of physical and mental health benefits. These include reducing the risk of disease, managing existing conditions, and developing and maintaining physical and mental function. Physical activity plays a role in maintaining a healthy weight – including the prevention of weight gain and reduction in body fat. However, irrespective of any change in weight, people who are overweight or obese will reduce their risk of cardiovascular disease and improve their health by being physically active²².

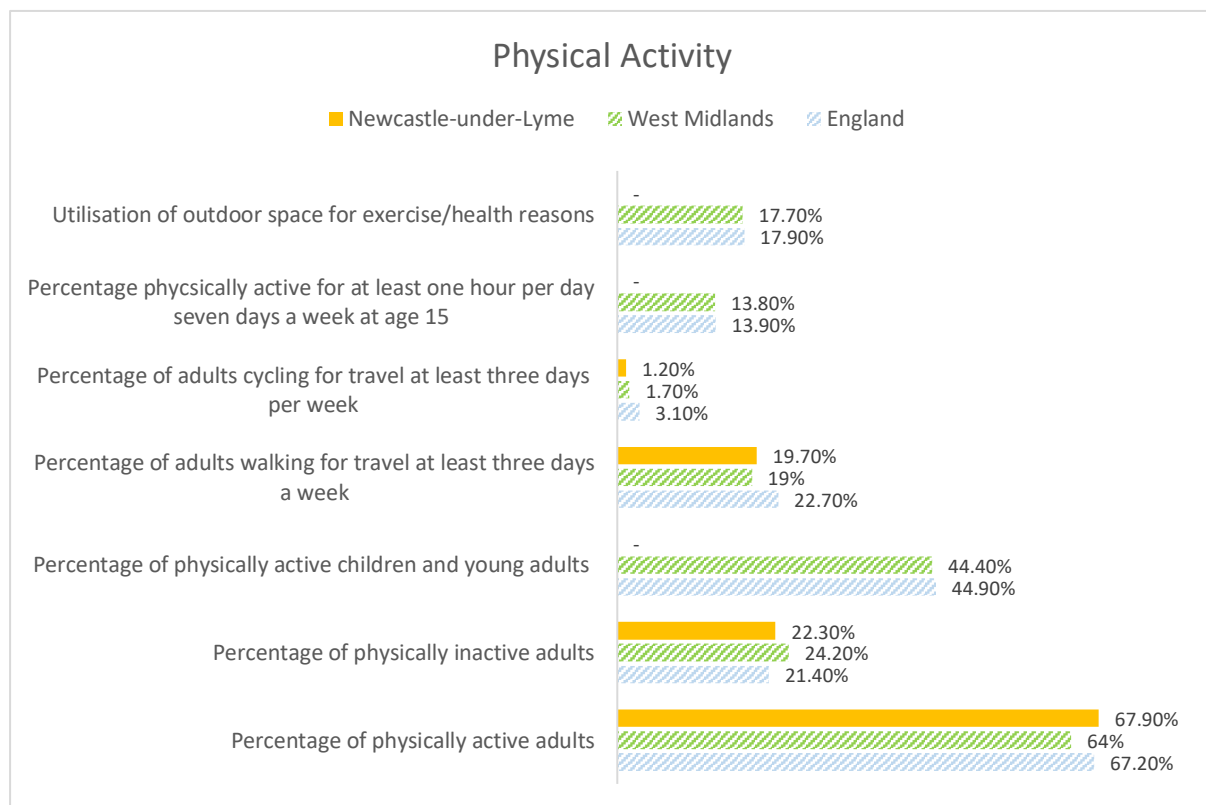


Figure 15 Public Health England, 2020

Figure 15 shows that the percentage of physically active adults in Newcastle-under-Lyme is slightly higher than England and 3.9% higher than the West Midlands, therefore meaning that

²²

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/832868/uk-chief-medical-officers-physical-activity-guidelines.pdf

the percentage of physically inactive adults is lower in Newcastle-under-Lyme. However, the percentage of adults who walk or cycle for travel at least three days per week is lower in Newcastle-under-Lyme than in the rest of England. The percentage is particularly lower for cycling.

Data for Newcastle-under-Lyme was unavailable for utilisation of outdoor space for exercise/health reasons, percentage physically active for at least one hour per day seven days a week at age 15 and percentage of physically active children and young adults.

Excess weight and obesity

Tackling obesity is one of the greatest long-term health challenges the UK faces. Around two thirds (63%) of adults are above a healthy weight, and of these half are living with obesity. 1 in 3 children leave primary school already overweight, with 1 in 5 living with obesity. Excess weight and obesity is associated with reduced life expectancy. It is a risk factor for a range of chronic diseases, including cardiovascular disease, type 2 diabetes, at least 12 kinds of cancer, liver and respiratory disease, and obesity can impact on mental health²³.

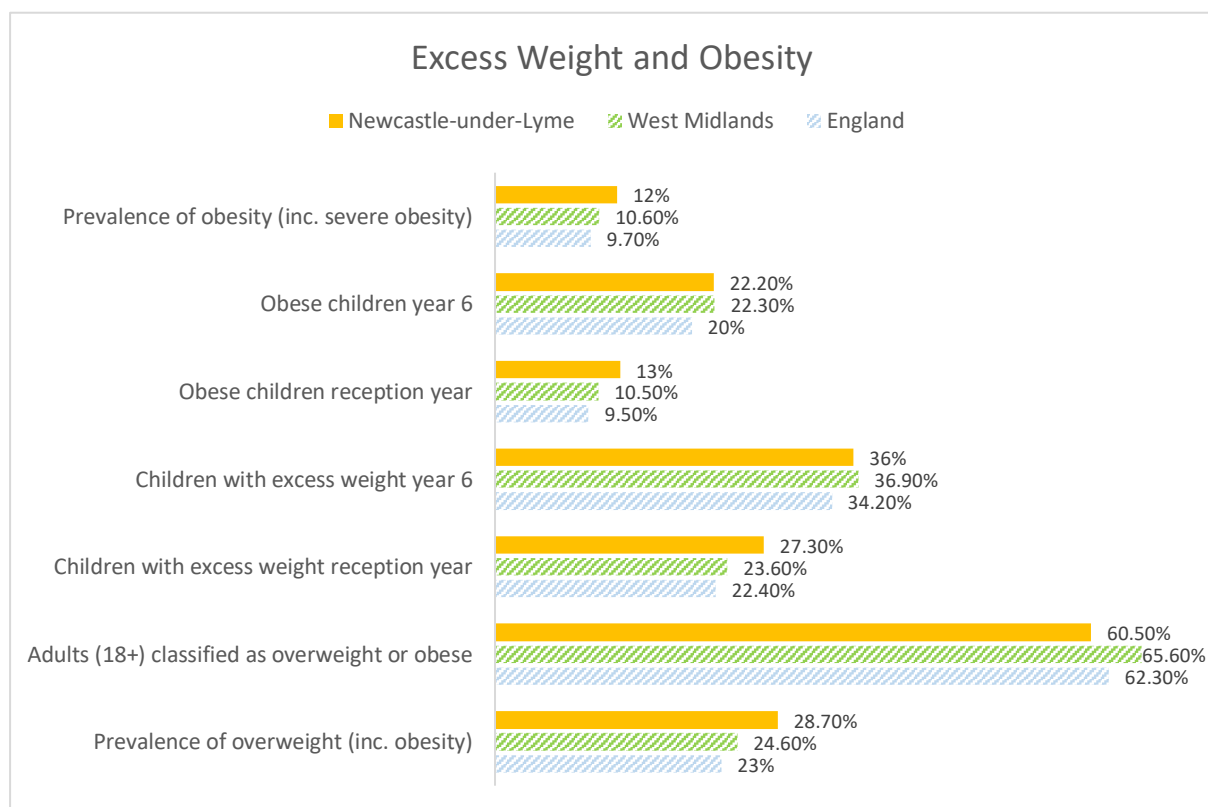


Figure 16 Public Health England, 2020

²³ <https://www.gov.uk/government/publications/tackling-obesity-government-strategy/tackling-obesity-empowering-adults-and-children-to-live-healthier-lives>

Figure 16 shows that Newcastle-under-Lyme has a larger weight/obesity problem than the West Midlands and England. The prevalence of overweight individuals in Newcastle-under-Lyme is 28.7%, compared to 24.6% in the West Midlands and 23% in England. However, the percentage of adults (18+) who are overweight is below the country average, whilst the percentage of children who are overweight is higher.

Diabetes

Type 2 diabetes can be prevented or delayed by lifestyle changes such as exercise and diet. Complications which occur as a result of having type 2 diabetes include cardiovascular, kidney, foot and eye diseases. These diseases can have a detrimental impact on your quality of life and morbidity.

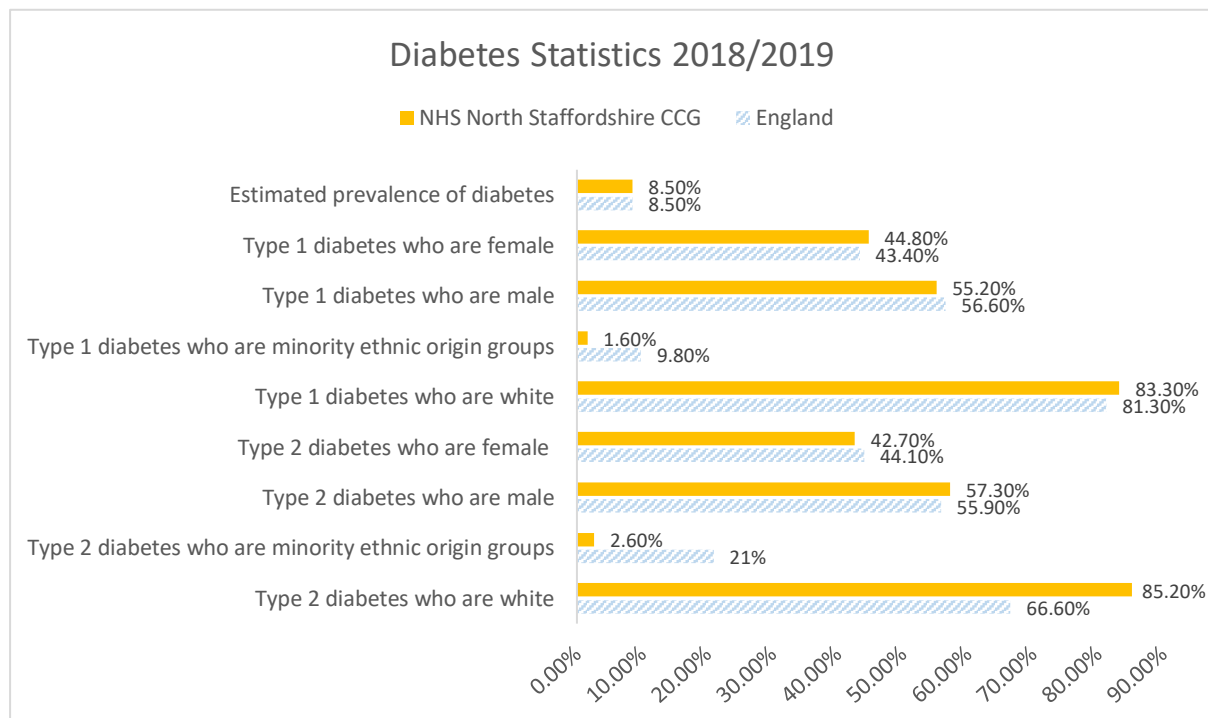


Figure 17 Public Health England

Figure 17 shows that Newcastle-under-Lyme (included in NHS North Staffordshire CCG data) has the same estimated prevalence of diabetes as England. Type 1 diabetes is more common in females compared to the rest of the country, whereas type 2 diabetes is more common in men.

However, Newcastle-under-Lyme has a larger prevalence of diabetes amongst the white community compared to England, and a much smaller prevalence amongst people from minority ethnic origin groups.

Cardiovascular Disease

Cardiovascular disease (CVD) is a general term for conditions affecting the heart or blood vessels. CVD is one of the main causes of death and disability in the UK, but it can often largely be prevented by leading a healthy lifestyle²⁴. The British Heart Foundation estimate that 12% of the population are living with some form of cardiovascular disease, equating to 16,300 people²⁵.

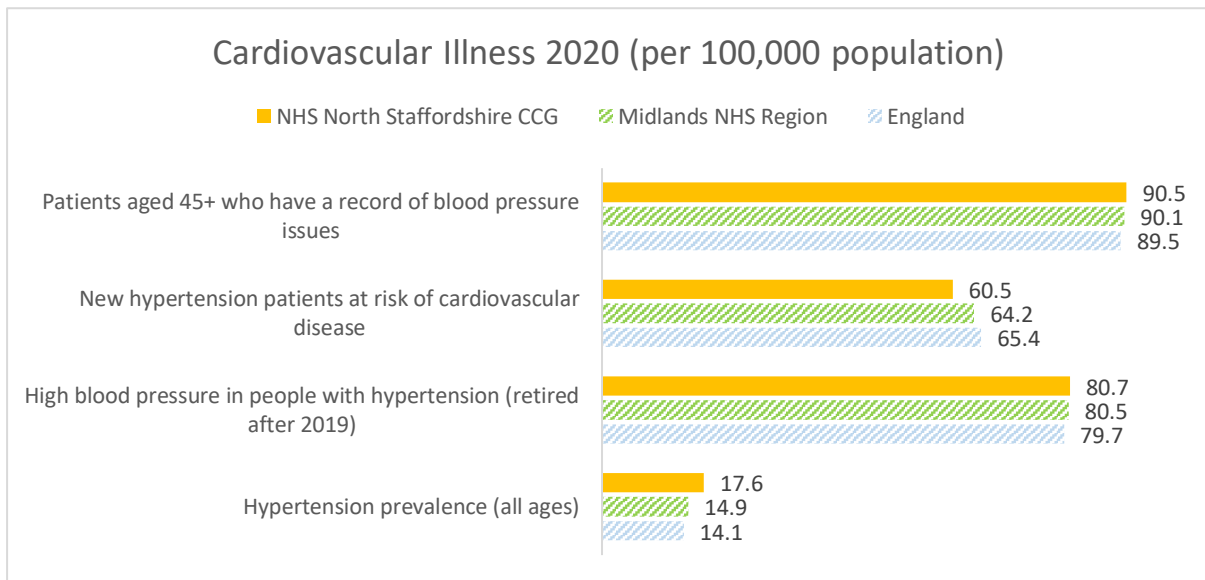


Figure 18 Public Health England, 2020

Figure 18 shows that Newcastle-under-Lyme (included in NHS North Staffordshire CCG data) has a 3.5% higher hypertension prevalence amongst all ages compared to England. However, patients aged 45+ with blood pressure issues and high blood pressure in people with hypertension is in line with the country average. Further, the percentage of new hypertension patients at risk of cardiovascular disease is 4.9% lower in Newcastle-under-Lyme compared to England.

Cancer

Cancer is a condition where cells in a specific part of the body grow and reproduce uncontrollably. These cells can invade and destroy surrounding healthy tissue, including

²⁴ [https://www.nhs.uk/conditions/cardiovascular-disease/#:~:text=Cardiovascular%20disease%20\(CVD\)%20is%20a,increased%20risk%20of%20blood%20clots.](https://www.nhs.uk/conditions/cardiovascular-disease/#:~:text=Cardiovascular%20disease%20(CVD)%20is%20a,increased%20risk%20of%20blood%20clots.)

²⁵ <https://www.bhf.org.uk/what-we-do/our-research/heart-and-circulatory-diseases-in-numbers/incidence-and-prevalence-incidence-by-local-authority>

organs. Making simple changes to your lifestyle can significantly reduce your risk of developing cancer. These include healthy eating, taking regular exercise and not smoking²⁶.

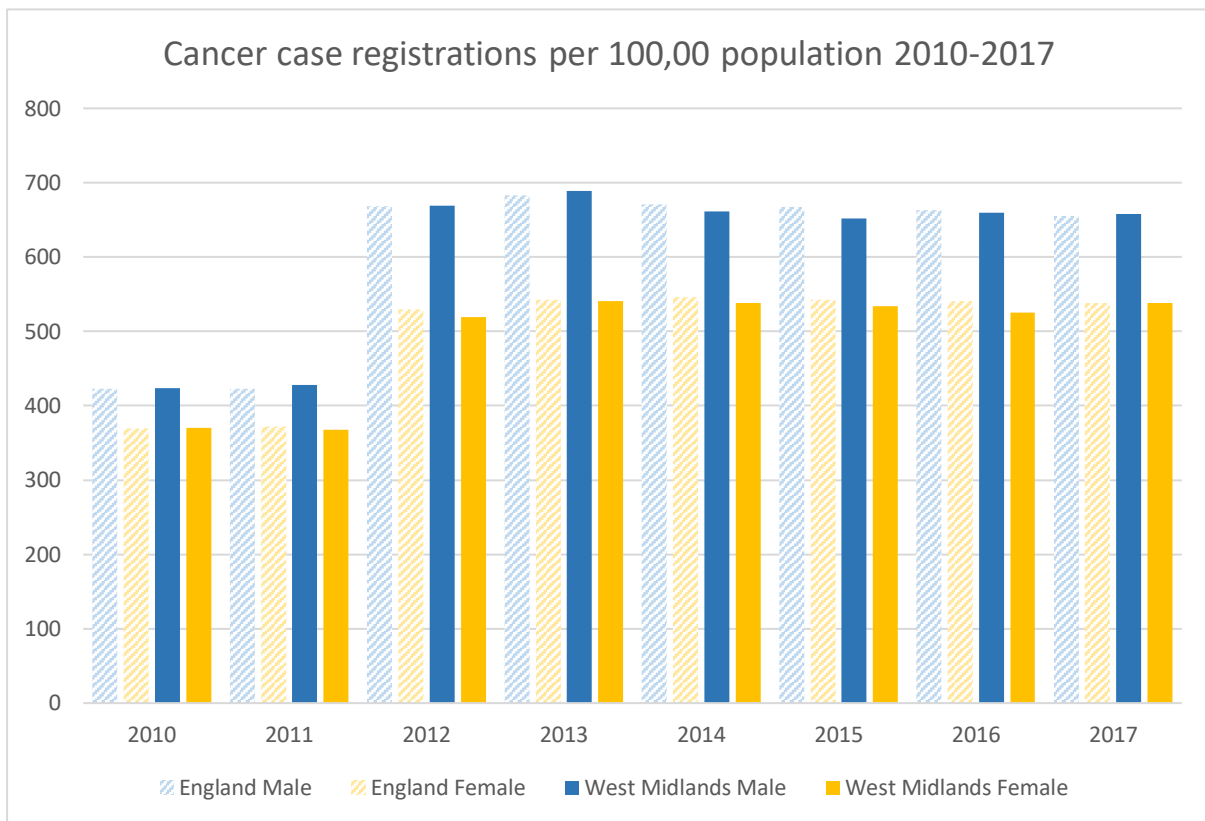


Figure 19 Office of National Statistics

²⁶ <https://www.nhs.uk/conditions/cancer/>

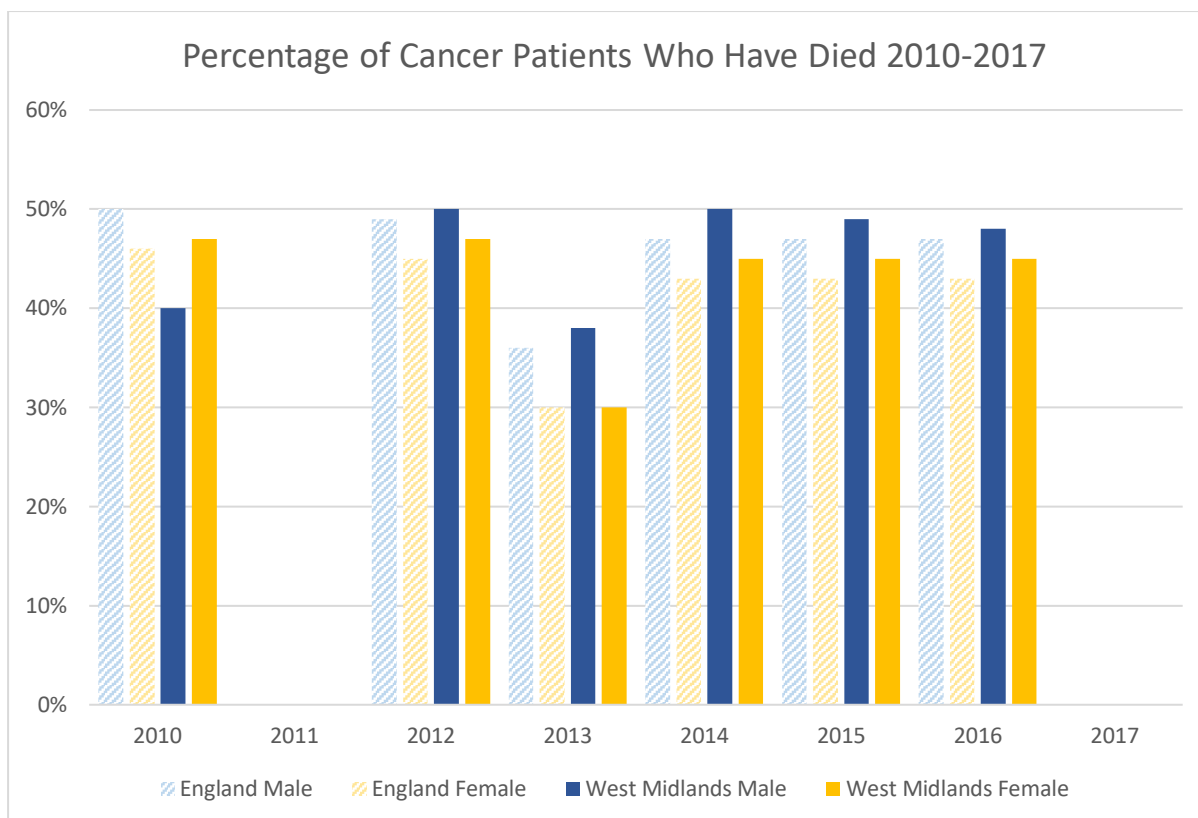


Figure 20 Office of National Statistics

Figure 20 shows that in 2011 and 2017 no data was available from the Office for National Statistics in relation to the percentage of cancer patients who have died. The percentage of patients who have died from cancer is similar across all years besides West Midlands Males in 2010 and all categories in 2013. The difference between male and female deaths in West Midlands follows the same pattern as England.

Mortality attributable to particulate air pollution

In the year ending 2019, the fraction of mortality attributable to particulate air pollution was 5.1%²⁷. This is down from 5.6% in 2014. In 2014, Newcastle-under-Lyme’s mortality rate attributable to particulate air pollution was 5.2%²⁸.

Alcohol related harm

Over time, excessive alcohol use can lead to the development of chronic diseases and other serious problems including high blood pressure, heart disease, stroke, liver disease, digestive problems and many forms of cancer²⁹. Alcohol related harm is estimated to cost the NHS in

²⁷ <https://fingertips.phe.org.uk/search/air%20pollution>

²⁸ Estimating Local Mortality Burdens associated with Particulate Air Pollution (2014)

²⁹ <https://www.cdc.gov/alcohol/fact-sheets/alcohol-use.htm#:~:text=Over%20time%2C%20excessive%20alcohol%20use,liver%20disease%2C%20and>

England £3.5 billion every year. Alcohol related admissions to hospital have grown by 17% in the last decade³⁰.

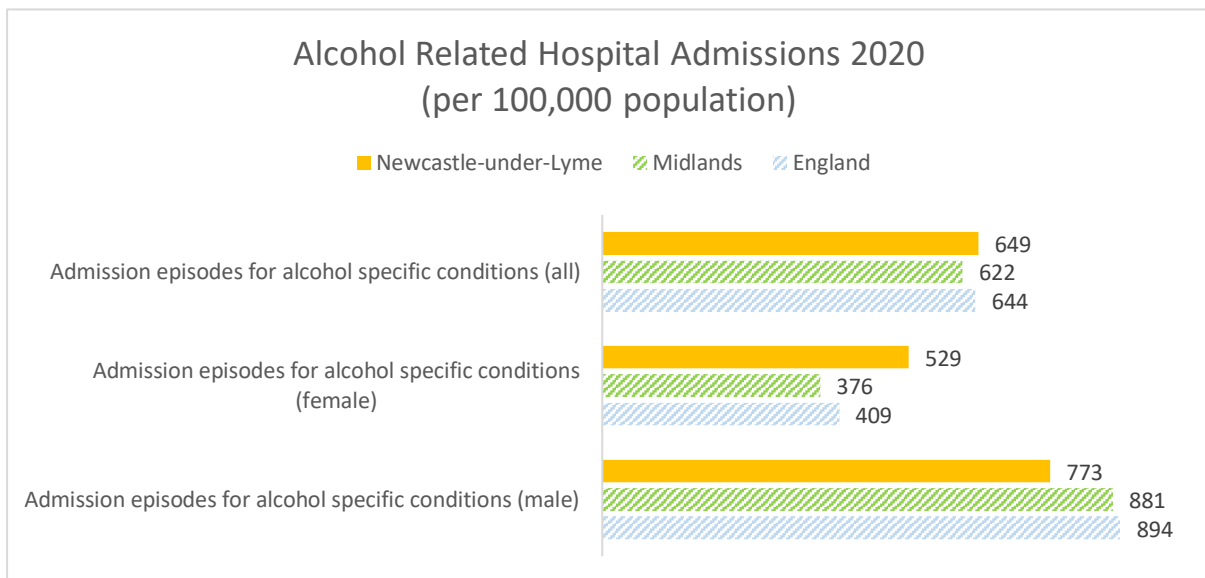


Figure 21 Public Health England, 2020

Figure 21 shows that admission episodes for the entire population for alcohol specific conditions is similar across Newcastle-under-Lyme, the Midlands and England. However, admission rates are higher per 100,000 of the population for females compared to the Midlands and England, and lower for males.

Liver Disease

Liver disease is one of the top causes of death in England. Liver disease can be prevented by maintaining a healthy weight and staying within the recommended alcohol limits³¹.

[%20digestive%20problems.&text=Cancer%20of%20the%20breast%2C%20mouth,esophagus%2C%20liver%2C%20and%20colon.](#)

³⁰ <https://www.england.nhs.uk/2019/01/nhs-long-term-plan-will-help-problem-drinkers-and-smokers/#:~:text=Alcohol%2Drelated%20harm%20is%20estimated,%C2%A33.5%20billion%20every%20year.>

³¹ <https://www.nhs.uk/conditions/liver-disease/>

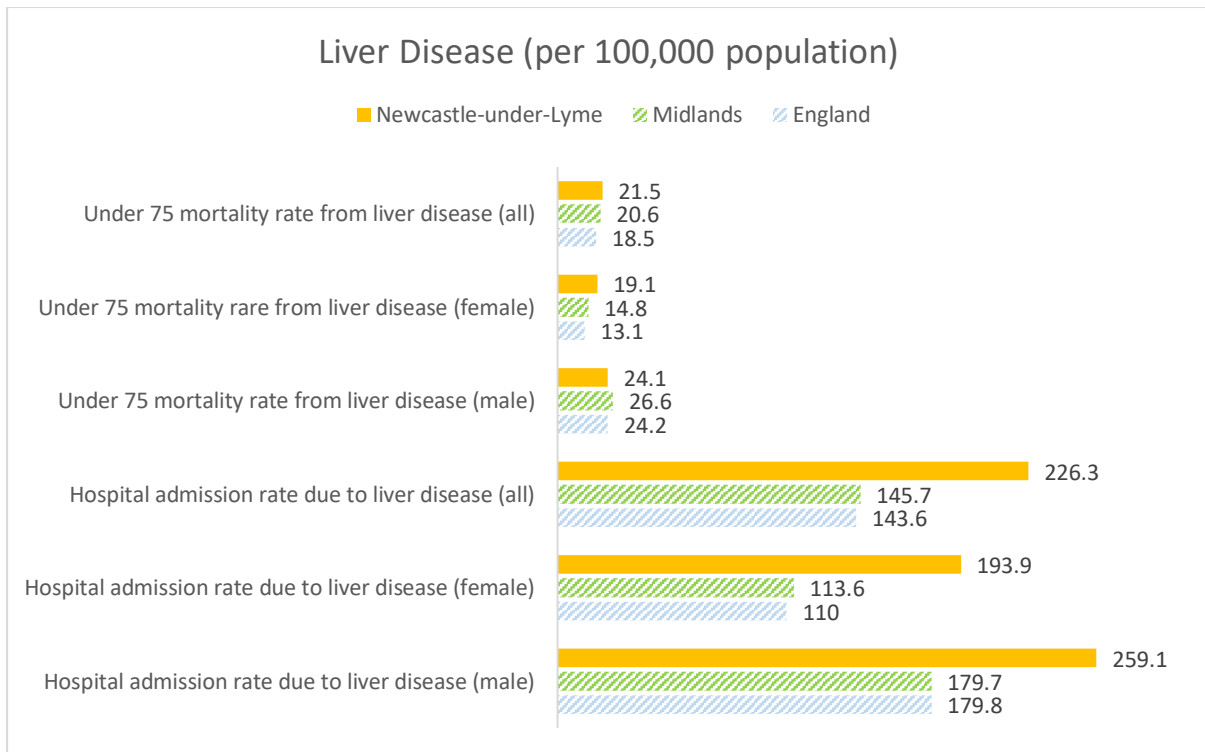


Figure 22 Public Health England, 2020

Figure 22 shows that hospital admission rates due to liver disease are significantly higher per 100,000 of the population in Newcastle-under-Lyme compared to the Midlands and England. This is the case for both males and females. However, whilst slightly higher, the mortality rate in the borough can be considered to be in line with the Midlands and England rates. It should be noted that whilst admission rates for females are significantly higher in Newcastle-under-Lyme than the Midlands and England, mortality rates are lower.

Fuel Poverty

Low temperatures are strongly linked to a range of negative health impacts and excess winter deaths³².

Figure 23 shows that between 2010 and 2018, the percentage of households in Newcastle-under-Lyme who are in fuel poverty has significantly decreased. In 2010, 22% of households in the borough were in fuel poverty, where as 11% are in 2018. The borough saw a large decrease between 2010 and 2011, before a fluctuating decrease between 2011 and 2018.

³² Marmot Review Team. (2011). The Health Impacts of Cold Homes and Fuel Poverty

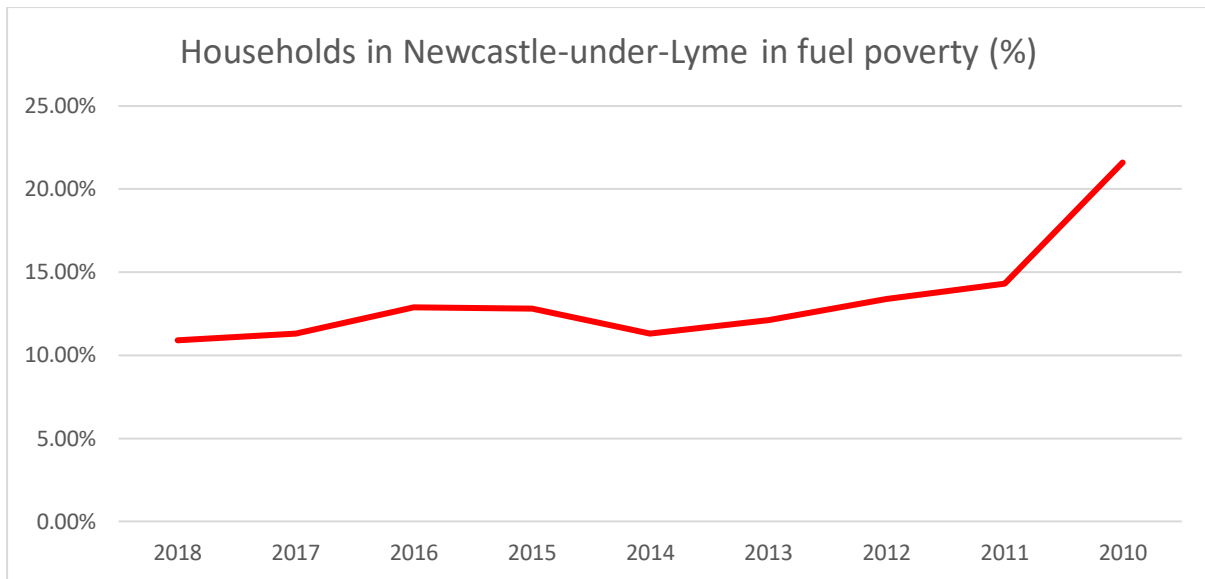


Figure 23 Households in Newcastle-under-Lyme in fuel poverty 2010-2018 (ONS, 2020)

Excess Winter Deaths

The Excess Winter Deaths (EWD) Index provides a ratio of extra deaths from all causes that occur in the winter months compared with the expected number of deaths, based on the average of the number of non-winter deaths.

The EWD Index is estimated by comparing the winter months of December to March with the average of the four-month periods before and after. It must be noted that for winter 2019 to 2020, deaths where coronavirus (covid-19) was mentioned on the death certificate, were excluded from the data. This is in order to improve the comparability of this winter's figures with previous years – as coronavirus is a new disease.

In England, there were an estimated 26,500 excess winter deaths (EWD) in 2019 to 2020, with 50.2% among males (13,300) and 49.4% among females (13,100). The excess winter mortality index in England was statistically significantly higher than for winter 2018 to 2019, but statistically significantly lower than the 2016 to 2017 and 2017 to 2018 winters³³.

33

[https://www.ons.gov.uk/peoplepopulationandcommunity/birthsdeathsandmarriages/deaths/bulletins/excesswintermortalityinenglandandwales/2019to2020provisionaland2018to2019final#:~:text=In%20Engl and%2C%20there%20were%20an,%25%20among%20females%20\(13%2C100\).](https://www.ons.gov.uk/peoplepopulationandcommunity/birthsdeathsandmarriages/deaths/bulletins/excesswintermortalityinenglandandwales/2019to2020provisionaland2018to2019final#:~:text=In%20Engl and%2C%20there%20were%20an,%25%20among%20females%20(13%2C100).)

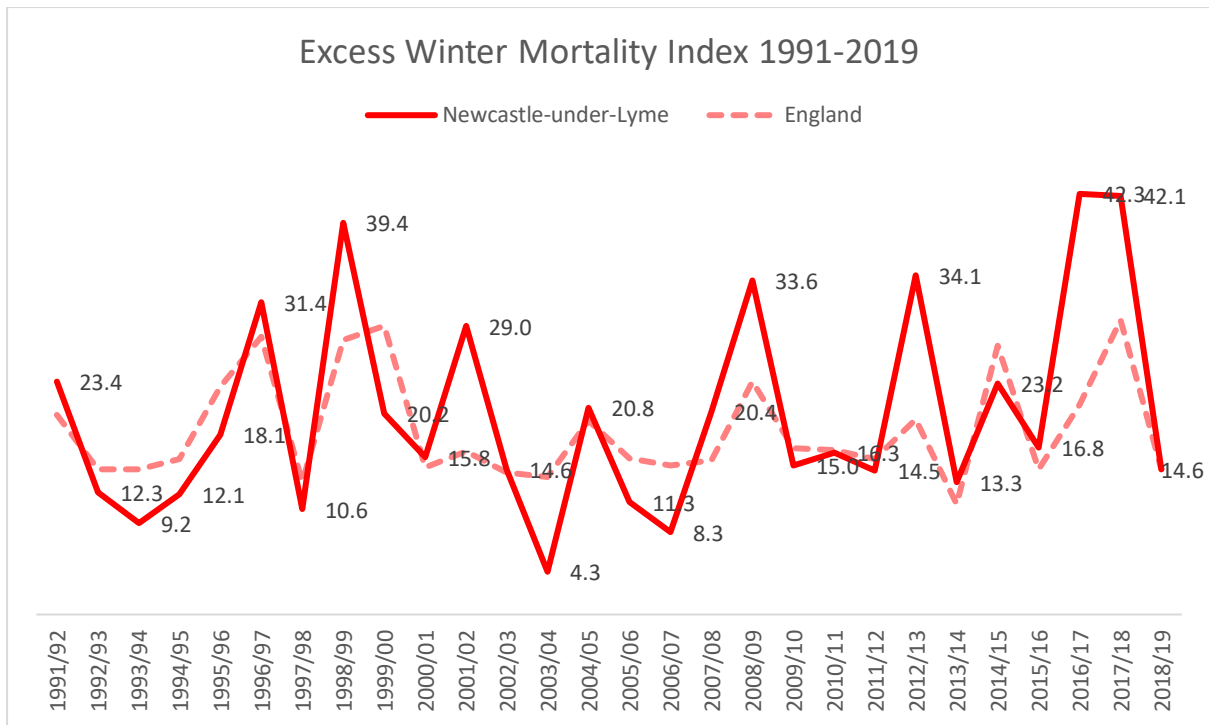


Figure 24 Excess winter Mortality Index 1991-2019 (ONS, 2020)

Figure 24 shows that whilst excess winter mortality rates fluctuate both nationally and in Newcastle-under-Lyme, between 1991 and 2019, there have been several occasions where it has been significantly higher in Newcastle-under-Lyme. For example, 1998, 2001, 2008, 2012, 2016 and 2017. However, it can be noted that in 1993, 2003 and 2006, excess winter mortality was much lower in the borough than across England.

Health Related Quality of Life

More than 1 in 5 of the population are over the age of 60, and the number of people over 60 is set to rise from 14.9million in 2014 to 18.5million in 2025. 75% of 75 years olds in the UK have one or more long term condition, rising to 82% of 85 year olds. Between 2007/08 and 2013/14 the number of A&E attendances by people aged 60 and over increased by two thirds³⁴. With an ageing population, there requires a larger focus on preserving independence and promoting well-being in older people.

³⁴ <https://www.england.nhs.uk/ourwork/clinical-policy/older-people/improving-care-for-older-people/>

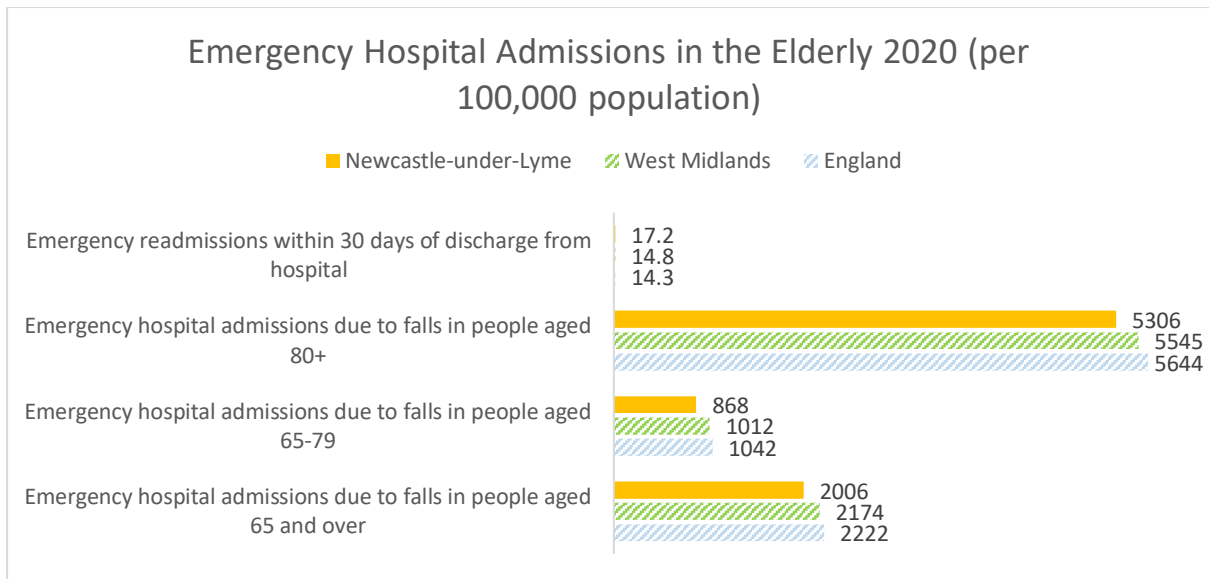


Figure 25 Public Health England, 2020

Figure 25 shows that in Newcastle-under-Lyme, there are fewer emergency hospital admissions in the elderly compared to the West Midlands and England. However, there are higher rates of readmission within 30 days of being discharged in Newcastle-under-Lyme.

Mental Well-Being

In the year 2019/20, NHS England spent £2,851,068 on mental health services in the North Staffordshire area, which includes Newcastle-under-Lyme and the Staffordshire Moorlands District³⁵.

³⁵ <https://www.staffordshire.gov.uk/Care-for-all-ages/Information-for-providers/Market-Position-Statements/Mental-health/Market-position-statement-for-mental-health.aspx#ThecountyofStaffordshire>

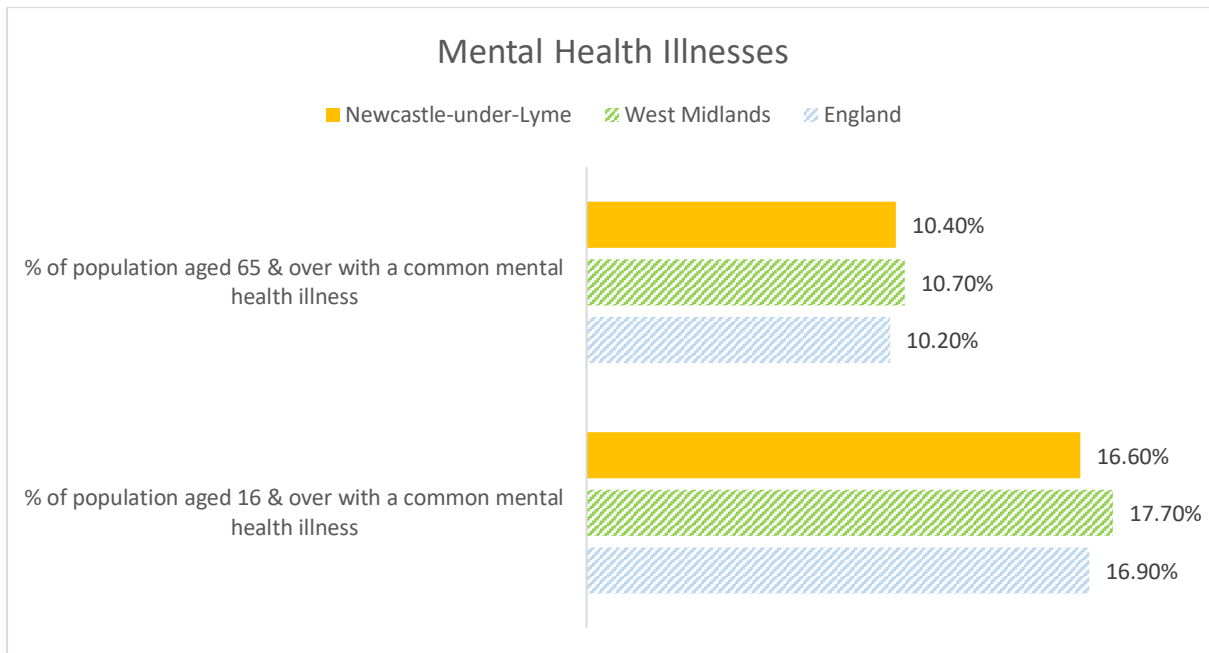


Figure 26 Public Health England, 2017

Figure 26 shows that similar percentages of cases of common mental health illnesses are present in Newcastle-under-Lyme, compared to the West Midlands and England.

Emergency Admissions to Hospital Due to Self-Harm

Self-harm is when you hurt yourself as a way of dealing with very difficult feelings, painful memories or overwhelming situations and experiences. Those who self-harm are at a higher risk of suicide. Common reasons for self-harm include:

- pressures at school or work;
- bullying;
- money worries;
- sexual, physical or emotional abuse;
- bereavement;
- homophobia, biphobia and transphobia;
- breakdown of a relationship;
- loss of a job;
- an illness or health problem;
- low self-esteem;

- an increase in stress; difficult feelings, such as depression, anxiety, anger or numbness³⁶.

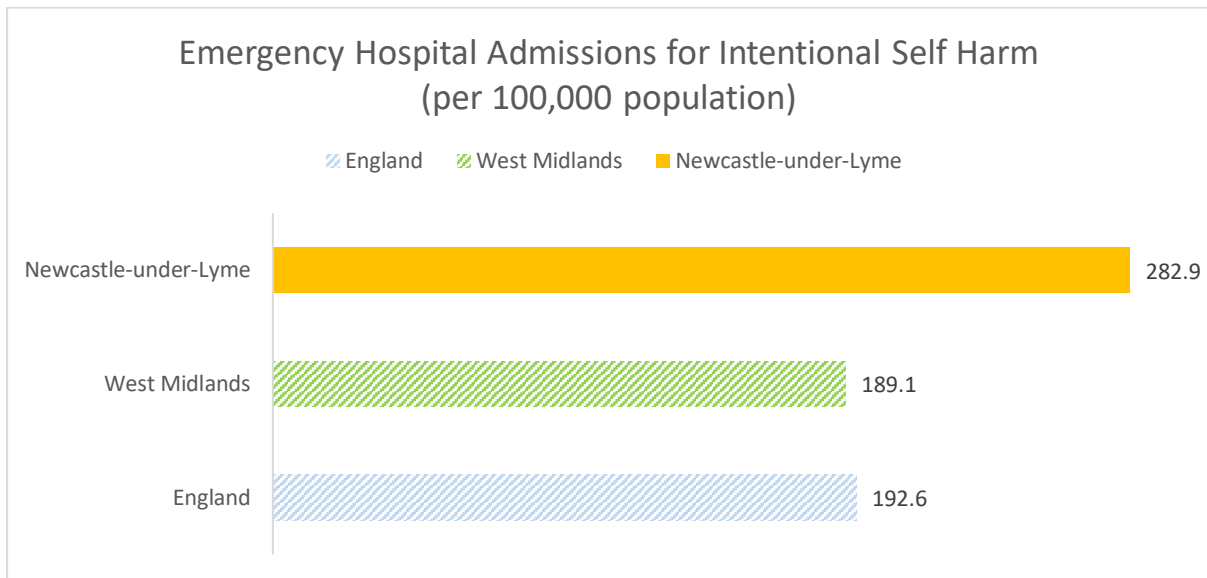


Figure 27 Public Health England, 2020

Figure 27 shows that hospital admissions for intentional self-harm is significantly higher in Newcastle-under-Lyme compared to the West Midlands and England. Admissions are 90.3 per 100,000 of the population higher in Newcastle-under-Lyme than in England.

Suicide Rate

Suicide is the act of intentionally taking your own life. Suicidal feelings can mean having abstract thoughts about ending your life or feeling that people would be better off without you. It can mean thinking about methods of suicide or making clear plans to take your own life³⁷.

³⁶ <https://www.mind.org.uk/information-support/types-of-mental-health-problems/self-harm/about-self-harm/>

³⁷ <https://www.mind.org.uk/information-support/types-of-mental-health-problems/suicidal-feelings/about-suicidal-feelings/>

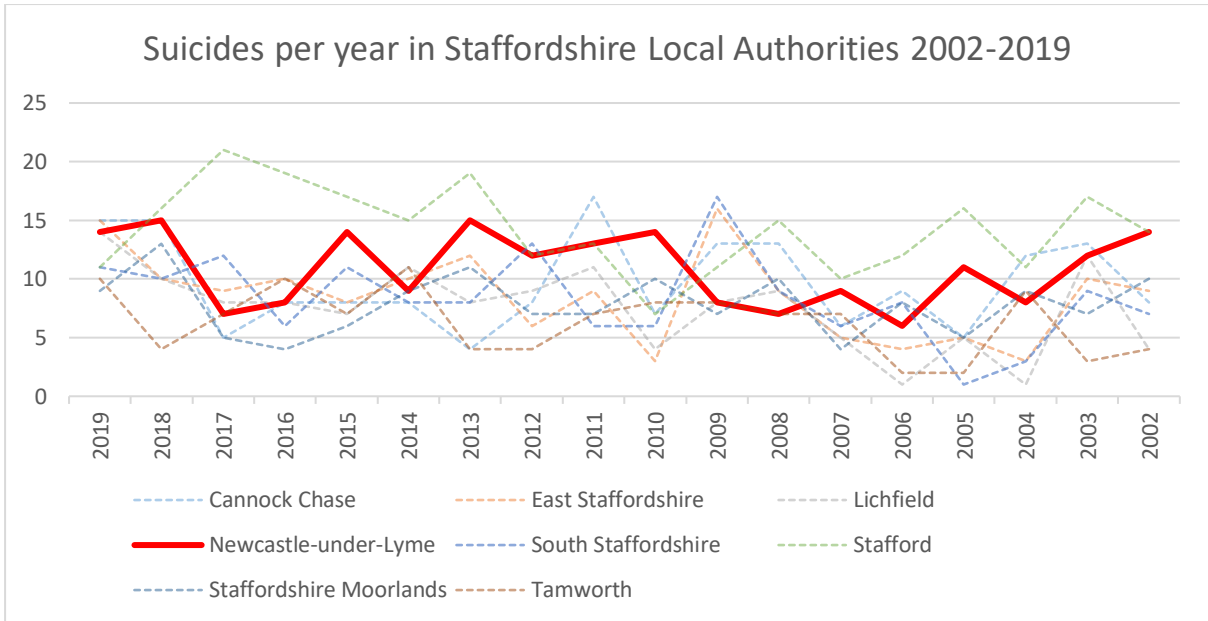


Figure 28 Deaths by suicide per year 2002-2019 in all Staffordshire local authorities (ONS, 2020)

It can be seen by figure 28 that deaths by suicide per year between 2002-2019 have fluctuated significantly amongst all local authorities. However, it must be noted that small increases/decreases appear to show a large fluctuation on figure 28. Therefore it is useful to look at the exponential trend line (blue) on figures 29 and 30 to show an overall change over time.

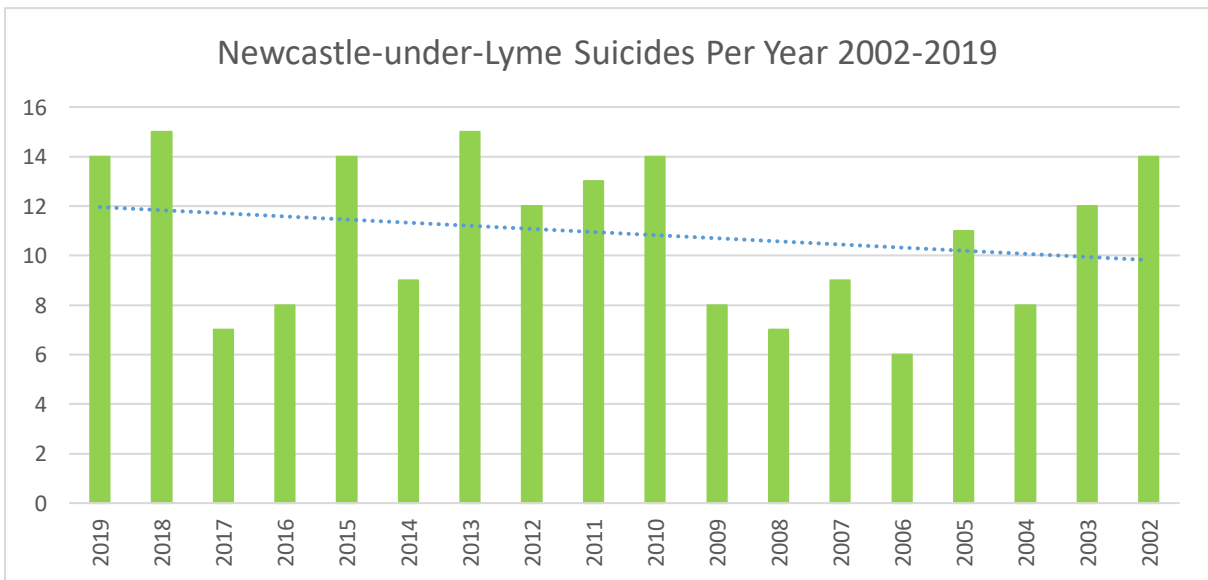


Figure 29 Deaths by suicide per year 2002-2019 (ONS, 2020)

Figure 29 shows that in Newcastle-under-Lyme, deaths by suicide have fluctuated more significantly than Staffordshire as a county. However, it can be seen by the exponential trend line that deaths by suicide have increased from 10 to 12 per year between 2002 and 2019.

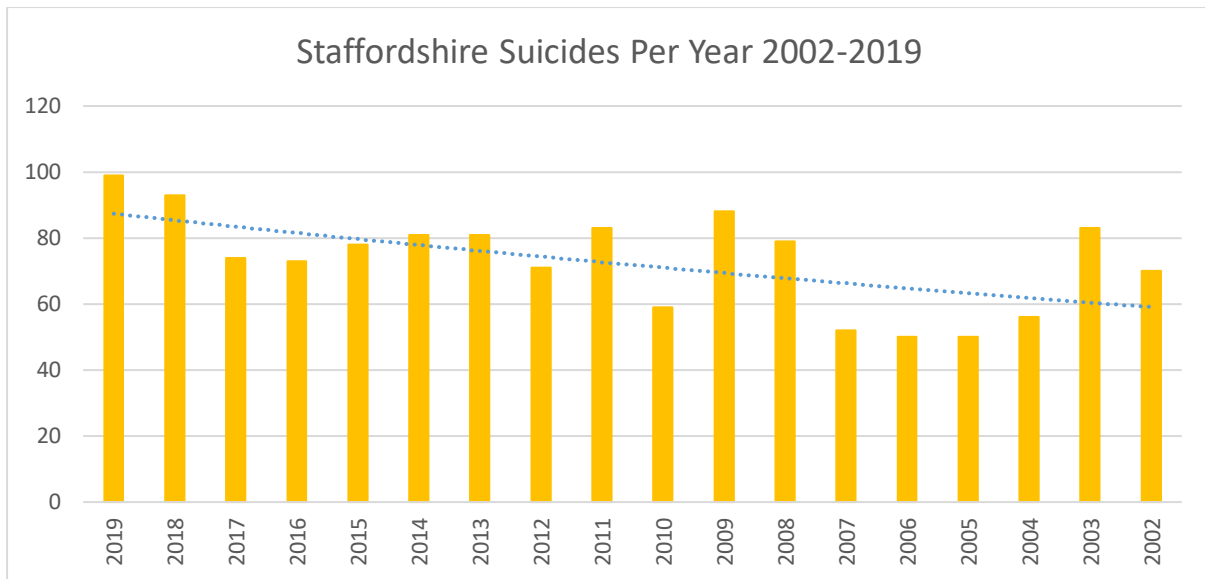


Figure 30 Deaths by suicide per year 2002-2019 in Staffordshire County (ONS, 2019)

Figure 30 shows that in Staffordshire, whilst fluctuating, there has been a general increase in suicides per year between 2002 and 2019. The number of deaths by suicide in 2019 is the highest recorded number thus far and is double the lowest recorded years in 2006 and 2007. The general increase, as seen by the exponential trend line (blue) has increased from 60 to 90 deaths by suicide per year.

Noise Complaints

The Noise Policy Statement for England was adopted in 2010. It sets out the long term vision of the government for noise policy, to promote good health and a good quality of life through the management of noise in the context of Government policy on sustainable development.

The policy aims to:

- avoid significant adverse impacts on health and quality of life;
- mitigate and minimise adverse impacts on health and quality of life;
- where possible, contribute to the improvement of health and quality of life³⁸.

³⁸ Noise Policy Statement for England (NPSE) (Defra, 2010)

Housing

Joint Housing Needs Assessment (2020)

Turley, in partnership with Edge Analytics, were commissioned by Newcastle-under-Lyme Borough Council and Stoke-on-Trent City Council to produce a new Housing Needs Assessment to form part of the evidence base for the emerging Local Plan.

The Housing Needs Assessment (2020) was produced to replace the Strategic Housing Market Assessment 2017 (SHMA), which in turn replaced the original SHMA from 2015.

The updated assessment was produced in the context of a revised National Planning Policy Framework (NPPF) which was published in 2018 and updated in 2019.

The Housing Needs Assessment (2020) suggests the following:

355 dwellings per annum are needed in Newcastle-under-Lyme using standard methodology;

- A larger need for 2,3 and 4 bed dwellings;
- 75% of new dwellings should be houses, 15% flats and 10% bungalows;
- A net need for 28 affordable homes per annum;
- 1 in 5 residents are limited in their daily activities, which must be taken in to account when establishing policies on new housing provision;
- An increase in employment roles projected in the ENA are typically filled by people renting properties;
- An increasing need for student accommodation, which is not explicitly taken in to account, as a result of Keele University's long-term ambition to double its student population over the next 40 years;
- Actively monitor the adequacy and number of plots available for self-builders.

Number of Houses

Since 2015, 1,066 additional homes have been added to the housing stock of Newcastle-under-Lyme. This is estimated to have grown the housing stock by circa 1.9%. This is slower rates than 3.5% in the West Midlands and 3.7% in England over the same time period³⁹.

Vacancy Rates

³⁹ Housing Needs Assessment Newcastle-under-Lyme & Stoke-on-Trent (Turley, 2020)

Overall vacancy rates in Newcastle-under-Lyme were 2.1% in 2020, compared to 2.7% in England.

	Total properties	Number of vacant properties	Change between 2019 and 2020	Change since 2010	Vacant LA owned properties	Overall vacancy rate
Newcastle-under-Lyme	56,707	1197	+46	-661	0%	2.1%

Table 16 Council Tax Base, 2020

Average house prices, average monthly private rental and affordability ratio

The average house price in Newcastle-under-Lyme in 2019 is £166,362, compared to the England average of £301,219. The average monthly private rental in Newcastle-under-Lyme is £522.50.

The affordability ratio (lower quartile income vs lower quartile house prices 2020) is 6.18x income in Newcastle-under-Lyme. This is compared to the England figure of 7.9x income⁴⁰.

Household Tenure

	Local Authority (incl. owned by other LAs)	Private Registered Provider	Other Public Sector	Private Sector	Total
Newcastle-under-Lyme	4	9873	0	46,830	56,707

Table 17 Office for National Statistics, 2020

Social Inclusiveness and Deprivation

Indices of Deprivation

The English Indices of Deprivation 2019 were published on 26th September 2019 and were an update to the English indices of deprivation 2015. They are produced using a series of 'domains'. These include income, employment, health deprivation and disability, education, skills training, crime, living environment and barriers to housing and services⁴¹.

⁴⁰ Housing Needs Assessment Newcastle-under-Lyme & Stoke-on-Trent (Turley, 2020)

⁴¹ The English Indices of Deprivation 2019 – Statistical Release Main Findings

Table 18 shows all areas within Newcastle-under-Lyme and their IMD rank and decile. A LSOA with a rank of 1 is the most deprived and the LSOA with a rank of 32,844 (total in the country) is the least deprived.

The deciles are calculated by ranking the 32,844 LSOAs in England from most deprived to least deprived and dividing them into 10 equal groups. LSOAs in decile 1 fall within the most deprived 10% of LSOAs nationally, and LSOAs in decile 10 fall within the least deprived 10% nationally.

LSOAs (lower-layer super output areas) are small areas designed to be of a similar population size, with an average of approximately 1500 residents or 650 households.

LSOA Name	Index of Multiple Deprivation (IMD) Rank	Index of Multiple Deprivation (IMD) Decile
Newcastle-under-Lyme 005A	18,854	6
Newcastle-under-Lyme 005B	22,320	7
Newcastle-under-Lyme 005C	24,097	8
Newcastle-under-Lyme 005D	10,190	4
Newcastle-under-Lyme 004A	28,338	9
Newcastle-under-Lyme 006A	11,910	4
Newcastle-under-Lyme 006B	8,469	3
Newcastle-under-Lyme 006C	18,776	6
Newcastle-under-Lyme 003A	15,662	5
Newcastle-under-Lyme 003B	10,672	4
Newcastle-under-Lyme 003C	13,643	5
Newcastle-under-Lyme 003D	5,190	2
Newcastle-under-Lyme 004B	23,038	8
Newcastle-under-Lyme 004C	20,800	7
Newcastle-under-Lyme 004D	27,107	9
Newcastle-under-Lyme 007A	5,185	2
Newcastle-under-Lyme 007B	3,389	2
Newcastle-under-Lyme 014A	8,706	3
Newcastle-under-Lyme 014B	26,923	9
Newcastle-under-Lyme 006D	11,639	4
Newcastle-under-Lyme 010A	7,441	3
Newcastle-under-Lyme 010B	1,747	1
Newcastle-under-Lyme 011A	10,756	4
Newcastle-under-Lyme 005E	18,409	6
Newcastle-under-Lyme 013A	28,379	9
Newcastle-under-Lyme 006E	7,249	3
Newcastle-under-Lyme 007C	13,431	5
Newcastle-under-Lyme 007D	5,263	2
Newcastle-under-Lyme 002A	8,921	3

Newcastle-under-Lyme 001A	22,026	7
Newcastle-under-Lyme 002B	19,415	6
Newcastle-under-Lyme 002C	4,083	2
Newcastle-under-Lyme 001B	28,927	9
Newcastle-under-Lyme 010C	2,638	1
Newcastle-under-Lyme 010D	12,329	4
Newcastle-under-Lyme 007E	7,067	3
Newcastle-under-Lyme 016A	17,385	6
Newcastle-under-Lyme 016B	25,592	8
Newcastle-under-Lyme 016C	18,331	6
Newcastle-under-Lyme 016D	30,493	10
Newcastle-under-Lyme 013B	29,366	9
Newcastle-under-Lyme 013C	20,189	7
Newcastle-under-Lyme 013D	11,971	4
Newcastle-under-Lyme 012A	31,784	10
Newcastle-under-Lyme 009A	24,167	8
Newcastle-under-Lyme 011B	11,877	4
Newcastle-under-Lyme 009B	25,590	8
Newcastle-under-Lyme 009C	20,403	7
Newcastle-under-Lyme 001C	20,989	7
Newcastle-under-Lyme 001D	22,342	7
Newcastle-under-Lyme 008A	19,634	6
Newcastle-under-Lyme 008B	18,480	6
Newcastle-under-Lyme 008C	19,880	7
Newcastle-under-Lyme 001E	18,960	6
Newcastle-under-Lyme 001F	22,938	7
Newcastle-under-Lyme 002D	11,340	4
Newcastle-under-Lyme 015B	31,548	10
Newcastle-under-Lyme 015C	24,304	8
Newcastle-under-Lyme 014C	6,547	2
Newcastle-under-Lyme 012B	8,036	3
Newcastle-under-Lyme 012C	10,193	4
Newcastle-under-Lyme 003E	14,464	5
Newcastle-under-Lyme 004E	19,184	6
Newcastle-under-Lyme 003F	7,423	3
Newcastle-under-Lyme 010E	10,440	4
Newcastle-under-Lyme 010F	9,004	3
Newcastle-under-Lyme 014D	28,285	9
Newcastle-under-Lyme 015E	27,283	9
Newcastle-under-Lyme 011C	8,515	3
Newcastle-under-Lyme 011D	11,405	4
Newcastle-under-Lyme 011E	6,068	2
Newcastle-under-Lyme 014E	27,636	9
Newcastle-under-Lyme 015F	32,345	10

Newcastle-under-Lyme 014F	14,106	5
Newcastle-under-Lyme 015G	28,153	9
Newcastle-under-Lyme 008D	19,180	6
Newcastle-under-Lyme 009D	21,189	7
Newcastle-under-Lyme 008E	13,996	5
Newcastle-under-Lyme 009E	23,127	8
Average	16,926	6

Table 28 Index of Multiple Deprivation (IMD) 2019

Index of Multiple Deprivation (IMD) Decile	Number of LSOAs in Newcastle-under-Lyme in Decile	Total in upper and lower decile groups
1	2	37
2	7	
3	10	
4	12	
5	6	
6	11	42
7	10	
8	7	
9	10	
10	4	

Table 19 Index of Multiple Deprivation (IMD) Newcastle-under-Lyme Deciles 2019

In total, there are 79 LSOAs in Newcastle-under-Lyme. The 2019 IMD gives the borough an average rank of 16,926 and average decile of 6. The above tables places 37 LSOAs in the bottom 5 deciles and 42 in the top 5 deciles. There are 2 LSOAs in Newcastle-under-Lyme in the most deprived 10% of LSOAs nationally.

Community and Safety

Police Recorded Violent Crime

The Health and Social Care Act was published in 2012 and provides the most extensive reorganisation of the structure of the NHS in England to date. As a result of this act, directors of Public Health in local authorities have “become responsible for the public health aspects of the promotion of community safety, violence prevention, responses to violence, and local initiatives to tackle social exclusion”⁴².

	England	West Midlands	Staffordshire
--	----------------	----------------------	----------------------

⁴² <https://www.gov.uk/government/publications/health-and-social-care-act-2012-fact-sheets>

Offences involving a knife	+7%	+6%	+5%
Violence against a person	+5%	+14%	+5%
Homicide	+10%	+28%	-
Violence with injury	-5%	-3%	-15%
Violence without injury	+3%	+15%	+10%
Stalking and harassment	+18%	+34%	+18%
Death or serious injury by unlawful driving	-4%	-41%	-
Sexual offences	-6%	-4%	-1%
Robbery	-17%	-21%	-30%
Theft offences	-20%	-22%	-19%
Burglary	-20%	-23%	-18%
Residential burglary	-19%	-23%	-16%
Non-residential burglary	-25%	-24%	-22%
Vehicle offences	-16%	-17%	-1%
Theft from person	-29%	-29%	-31%
Bicycle theft	-13%	-18%	-9%
Shoplifting	-23%	-28%	-33%
All other theft offences	-23%	-21%	-17%
Criminal damage and arson	-8%	-15%	-2%
Drug offences	+16%	+7%	-9%
Possession of weapons	-1%	+1%	-15%
Public order offences	+7%	+24%	+12%
Miscellaneous crimes against society	+3%	+5%	-15%
Total	-6%	-5%	-6%

Table 20 Police Force Area data Office for National Statistics 2021⁴³

Table 20 shows that Newcastle-under-Lyme, included in the data for Staffordshire, has seen a 1% further decrease in crime between 2019 and 2020 compared to the West Midlands, and is parallel with the average decrease seen across England, -6%. Further, England as a nation has seen 8 areas where crime has increased, compared to 9 in the Midlands and 5 in

43

<https://www.ons.gov.uk/peoplepopulationandcommunity/crimeandjustice/datasets/policeforceareadata>
tables

Staffordshire. Areas of crime which have increased in Staffordshire and Newcastle-under-Lyme are violence involving a knife, violence against a person, violence without injury, stalking and harassment and public order offences.

Economic

Material Assets

Table 21 shows that the gross annual median wage in Newcastle-under-Lyme is lower than both the West Midlands and England. However, whilst slightly below the national and West Midland average for change between 2009 and 2019, it can be said that Newcastle-under-Lyme is in line with the national increase in wages, increasing by 16% whilst England increased by 17% within the same time frame⁴⁴.

	2009	2019	Change
Newcastle-under-Lyme	£20,901	£24,270	+16%
West Midlands	£23,958	£28,536	+19%
England	£26,133	£30,667	+17%

Table 31 Change in workplace gross annual median wages 2009-2019 (Turley, 2020)

In 2020, the median gross weekly pay in the UK was £585.50, up by 0.1% on 2019. This is an increase of £0.30 a week against 2019. This median gross weekly pay equates to a median hourly pay of £15.07 for full time workers, excluding overtime⁴⁵.

In Newcastle-under-Lyme, the median gross weekly pay was £535.10 in 2020, up by 3.3% on 2019. This is an increase of £17.90 a week against 2019. This median gross weekly pay equates to a median hourly pay of £13.86 for full time workers, excluding overtime⁴⁶. Therefore, whilst below the UK average for weekly and hourly pay, Newcastle-under-Lyme has seen a much larger percentile increase in weekly earnings since 2019 compared to the rest of the UK.

Home Ownership

Home ownership is higher in Newcastle-under-Lyme than the average for England.

	Owned Outright	Owned with a mortgage or loan	Shared ownership	Social Rented	Private Rented from landlord	Private Rented Other	Living Rent Free

⁴⁴ Economic Needs Assessment Newcastle-under-Lyme & Stoke-on-Trent Turley, 2020

⁴⁵ <https://www.nomisweb.co.uk/datasets/asher>

⁴⁶ <https://www.nomisweb.co.uk/datasets/asher>

Newcastle-under-Lyme	35.2%	33.9%	0.4%	18.7%	9.4%	1.1%	1.3%
England	30.6%	32.8%	0.8%	17.7%	15.4%	1.4%	1.3%

Table 22 Census 2011

Economic Activity

Economic activity relates to whether or not an adult (aged 16 and over) was working or looking for work at the time of the survey, thus illustrating the extent to which they are actively participating in the labour market.

	2009	2019	Change
Newcastle-under-Lyme	63%	62%	-1%
Stok-on-Trent	60%	59%	-1%

Table 23 Economic activity rates 2009-2019 (Turley, 2020)

Economic Activity	Newcastle-under-Lyme
Economically Active: In Employment	54,599
Economically Active: Student (including full-time students)	3,591
Economically Inactive: Looking after home/ family/retired	17,813
Economically Inactive: Permanently sick/ disabled	4,341
Economically Inactive: Unemployed	3,378

Table 24 Economic activity - all people (Census 2011)

	Newcastle-under-Lyme	Newcastle-under-Lyme %	West Midlands %	Great Britain %
All People				
Economically active	63,800	75.8%	77.9%	79.0%
In employment	56,700	67.1%	73.7%	75.7%
Employees	50,900	60.1%	64.2%	65.1%
Self employed	5,800	7.1%	9.4%	10.3%
Unemployed	2,000	3.1%	5.2%	4.2%
Males				
Economically active	36,100	78.9%	82.3%	82.9%
In employment	32,000	69.5%	77.4%	79.1%

Employees	28,500	61.7%	64.5%	65.5%
Self employed	*	*	12.8%	13.4%
Unemployed	*	*	5.7%	4.5%
Females				
Economically active	27,700	72.2%	73.4%	75.2%
In employment	24,700	64.4%	70.0%	72.2%
Employees	22,300	58.2%	63.8%	64.6%
Self employed	*	*	6.1%	7.3%
Unemployed	*	*	4.6%	3.8%

Table 25 Employment and unemployment (ONS 2020)

* sample size too small for reliable estimate

	Newcastle-under-Lyme	Newcastle-under-Lyme %	West Midlands %	Great Britain %
Total	19,800	24.2%	22.15	21.0%
Student	7,200	36.5%	27.9%	26.9%
Looking after family/home	*	*	23.0%	20.8%
Temporarily sick	!	!	1.9%	1.9%
Long-term sick	*	*	24.1%	23.8%
Discouraged	!	!	0.5%	0.55
Retired	!	!	13.0%	13.5%
Sick	*	*	9.5%	12.7%

Table 26 Economic inactivity (ONS 2020)

* sample size too small for reliable estimate

! estimate is not available since sample size is disclosive

Economic Activity	Newcastle-under-Lyme
All people aged 16-74 in employment	57,366
Manufacturing (C)	12.5%
Construction (F)	8.1%
Wholesale and retail trade; repair of motor vehicles and motor cycles (G)	18.9%
Public administration and defence compulsory social security, education, human health and social work activities (O, P, Q)	29.1%

Table 27 Industry of employment (selected groups) - All people aged 16-74 in employment (Census 2011)

Economically Active	Newcastle-under-Lyme	West Midlands	Great Britain
Managers, directors and senior officials	11.4%	10.7%	11.5%
Professional occupations	21.9%	21.2%	22.3%
Associate professional & technical	12.2%	13.7%	15.2%
Administrative & secretarial	*	10.2%	9.9%
Skilled trades occupations	11.8%	10.2%	9.5%
Caring, leisure and other service occupations	11.5%	9.2%	9.0%
Sales and customer service occupations	*	6.4%	6.9%
Process; plant and machine operatives	*	6.5%	5.6%
Elementary occupations	*	11.8%	9.7%

*Table 28 Occupation groups (ONS 2020)
% is a proportion of all persons in employment
* sample size too small for reliable estimate*

	Newcastle-under-Lyme (jobs)	Newcastle-under-Lyme (density)	Great Britain (density)
Job density	49,000	0.60	0.87

Table 29 Labour demand - jobs density 2019 (Nomis)

Local Economy

The local economy in Newcastle-under-Lyme has not grown at the same rate as neighbouring boroughs. Between 2009 and 2018, 183 jobs were created in the borough. This is substantially lower than Stoke-on-Trent where 14,489 were created within the same time period. The change experienced in Newcastle-under-Lyme is 1.3% lower than Stoke-on-Trent and 1.1% than England.

Employment in Newcastle-under-Lyme has been stable, but has recovered from a decline that followed the last recession with more jobs in each of the last five years than were recorded in 2009. Therefore, while the borough is implied to have created only 20 jobs per annum since 2009, this average rises to 177 jobs per year – or 0.2% growth per annum – when calculated over the past five years (2013-18).

Further, the amount of business units in Newcastle-under-Lyme grew by 13% between 2010 and 2019. This is significantly lower than 20% in the West Midlands and 25% nationally⁴⁷.

Education

	Newcastle-under-Lyme			Stoke-on-Trent		
	2009	2019	Change	2009	2019	Change
No qualifications	14%	7%	-7%	18%	13%	-5%
Other qualifications	5%	5%	0%	9%	7%	-2%
NVQ1+	81%	89%	+8%	73%	81%	+8%
NVQ2+	67%	78%	+11%	56%	67%	+11%
NVQ3+	45%	51%	+6%	36%	46%	+10%
NVQ4+	23%	30%	+7%	18%	25%	+7%

Table 30 Highest level of qualification 2009-2019 (Turley, 2020)

Keele University

Keele University is a major employer with over 2,000 staff, equivalent to 1,750 full-time equivalent

(FTE) jobs (2018). This makes the University one of the largest employers in the area, alongside the NHS and local government.

The University is a key facilitator of job creation for the Borough and wider region. The existing Science and Innovation Park currently provides some 600 jobs across some 50 companies (July 2020). These range in size and status from start-up companies to satellite premises of multi-national organisations. All are knowledge-based enterprises.

The University has developed a 2040 Vision for expansion to allow for an additional 1,500 students every 5 years.

Transport

The efficient and reliable movement of people and good to, from, through and within Newcastle-under-Lyme is essential to maintaining the area's reputation as a competitive and liveable region.

Transport is an enabler of economic activity; it can improve productivity, support extensive labour markets and allow businesses to benefit from agglomeration. However, if left unmanaged, it can hamper economic activity and sustainable development. The Confederation of British Industry estimates that congestion costs the UK economy £20bn a

⁴⁷ Economic Needs Assessment Newcastle-under-Lyme & Stoke-on-Trent (Turley, 2020)

year and Stafford Chamber of Commerce states that traffic congestions in the region costs each business around £20,000 a year.

The Staffordshire Local Transport Plan was adopted in 2011 and sets out the county transport plan to 2026. It incorporates Newcastle-under-Lyme and sets out the County Council’s proposals for transport provision in the county, including walking, cycling, public transport, car based travel and freight, together with the management and maintenance of local roads and footways⁴⁸.

Material Assets

Table 31 shows the percentage of roads in Staffordshire, the West Midlands and England where maintenance needs to be considered. Data for Newcastle-under-Lyme is incorporated into the data for Staffordshire.

Principal (LA maintained ‘A’ roads and motorways)									
	2010/ 11	2011/ 12	2012/ 13	2013/ 14	2014/ 15	2015/ 16	2016/ 17	2017/ 18	2018/ 19
Staffords hire	4	4	3	2	2	2	3	3	3
West Midlands	6	5	5	4	4	4	4	3	3
England	5	5	5	4	4	3	3	3	3
Non-principal (LA maintained ‘B’ and ‘C’ roads)									
Staffords hire	11	14	10	9	9	6	8	8	8
West Midlands	9	10	9	8	7	6	7	6	7
England	10	10	9	8	7	6	6	6	6
Unclassified Roads									
Staffords hire	-	16	14	12	12	11	11	11	12
West Midlands	16	17	17	16	17	16	16	17	15
England	16	17	18	18	18	16	17	16	16

Table 31 Percentage of roads where maintenance needs to be considered (Department for Transport, 2019)

Table 32 shows roads which are maintained by local authorities categorised depending on their need for maintenance. The categories mean:

Green – no further investigation needed;

Amber – may need work soon;

⁴⁸ Staffordshire Local Transport Plan 2011

Red – further investigation needed to determine whether maintenance work is needed immediately.

It can be seen that Newcastle-under-Lyme (incorporated within the data for Staffordshire) is in line with the data for the West Midlands and England.

LA maintained roads							
	2017/18				2018/19		
	Green	Amber	Red		Green	Amber	Red
Staffordshire	74	24	3		73	25	3
West Midlands	70	26	4		71	26	3
England	74	23	3		74	23	3

Table 32 Department for Transport, 2019

Road Congestion

Table 33 shows the average levels of congestion on major roads in Newcastle-under-Lyme. The figures given are the average delay in seconds, per vehicle per mile. It must be remembered that the statistics given for 2020 were during the Coronavirus Covid-19 pandemic, and therefore are significantly lower than the 2017-2019 data, due to restrictions on movement being in place.

	2017	2018	2019	2020	Change
A50	12.2	13.3	11.8	8.0	-30.9%
A500	16.7	16.3	18.1	10.0	-40%
M6	7.9	8.5	7.1	4.2	-40%

Table 43 Traffic congestion on major roads in Newcastle-under-Lyme (Department for Transport, 2020)

Car Ownership

	Total
All categories: car or van availability	52,574
No cars or vans in household	11,632
1 car or van in household	22,475
2 cars or vans in household	14,283
3 cars or vans in household	3,178
4 or more cars or vans in household	1,006
Sum of all cars or vans in the area	65,011

Table 34 Car ownership in Newcastle-under-Lyme (Census, 2011)⁴⁹

⁴⁹

https://www.nomisweb.co.uk/census/2011/QS416EW/view/1946157176?rows=cell&cols=rural_urban

Bus Patronage

Over 20 million bus passenger journeys are made in Staffordshire each year of which over 3 million are in the Newcastle urban area⁵⁰.

Two thirds of residents live within 350m of a bus stop with a half-hourly service between 8am and 6pm Monday to Friday. However, there are still residents who struggle with access to services. Accessible public transport is key to sustainable development in the borough.

Public satisfaction levels with travel information in Staffordshire is low at 38%, placing the county ninth out of the county's ten nearest neighbours⁵¹.

Rail Patronage

The county's geographical location aids its connection to the national rail network. The West Coast Mainline runs north to south, providing connections to major cities such as Liverpool, Manchester, Birmingham and London.

Kidsgrove Rail Station building is an example of a late 1960's early 1970's station design which rationalised the facilities for customers. Station footfall has increased enormously over the past decade, registering 235,000 entries and exits in 2018/19, up from 141,000 in 2010/11. This is an increase of 67% and is significantly higher than the average growth for both Staffordshire (47%) and the UK (43%). Growth in usage has been driven by the introduction of direct and improved links to Manchester, Stoke, Birmingham and London in addition to a much-improved performance of trains on the North Staffordshire Line between Crewe and Derby. As a result, the Station no longer meets the standards expected by passengers and does not compare favourably to other local stations. The plans for a new station building will ensure that it meets the needs of passengers and the local community together with any future service enhancements and in the longer term plan for a HS2 Hub at Crewe. The HS2 hub at Crewe will transform rail services in South Cheshire and North Staffordshire by offering two HS2 services to London per hour, with a journey time of just 55 minutes.

Satisfaction Levels

Whilst no data is available for Newcastle-under-Lyme as an individual borough, data for the county of Staffordshire is available from the 2020 National Highways & Transport Network Survey.

	2020	UK Average	Difference
Overall satisfaction	48%	52%	-4%

⁵⁰ Stoke-on-Trent City Council and Newcastle-under-Lyme Borough Council Joint Local Plan Issues Consultation Transport Technical Paper

⁵¹ Staffordshire County Council Local Transport Plan 2011

Accessibility (all)	77%	77%	0%
Accessibility (disabled)	69%	66%	+3%
Accessibility (no car)	67%	70%	-3%
Public Transport	56%	60%	-4%
Cycle routes & facilities	44%	49%	-5%
Pavements & footpaths	55%	55%	0%
Tackling Congestion	48%	46%	2%
Road Safety	57%	57%	0%
Highway Maintenance	45%	50%	-5%
Communication	43%	48%	-5%

Figure 31 National Highway & Transport Network 2020

Whilst this data does not provide a picture of the situation in Newcastle-under-Lyme, it does provide data for the county as a whole which can be used as a benchmark for areas of improvement.

Travel to Work

The 2020 Office for National Statistics Travel to Work Methods data shows that the main form of transport used to travel to work is the private car. In figure 32, this method can be seen dominating all industries. A very small amount of people chose to travel by bus or rail, bicycle or by foot.

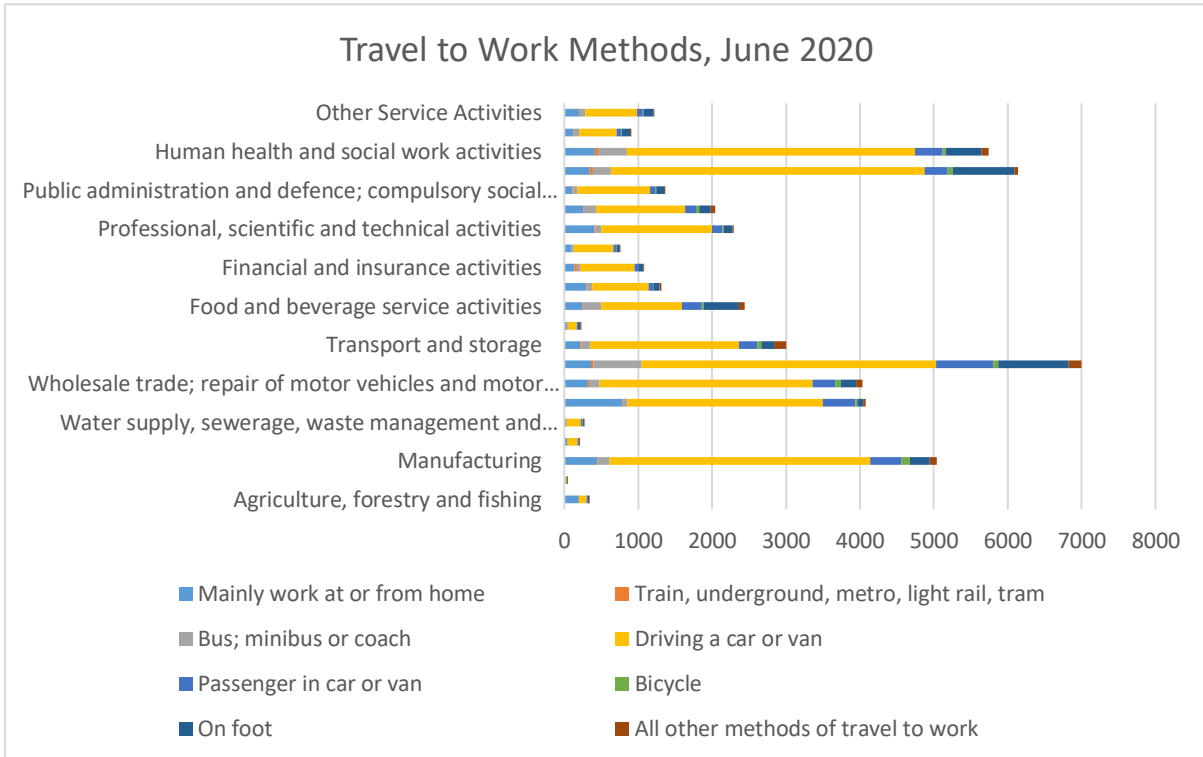


Figure 32 ONS

Traffic Incidents

Worldwide every year the lives of approximately 1.35 million people are cut short due to a fatal road traffic collision. Between 20 and 50 million people suffer non-fatal injuries and many incur disabilities as a result of their injuries. Road traffic injuries cause considerable economic losses to individuals, their families and nations as a whole. These losses arise from the cost of treatment as well as lost productivity for those killed or disabled by their injuries, and for family members who need to take time off work or school to care for the injured. Road traffic crashes cost most countries 3% of their gross domestic product⁵².

Road traffic collisions are a major cause of preventable deaths, particularly in younger age brackets. These deaths are avoidable by raised awareness of risk and improvements to road infrastructure.

	England	West Midlands	Staffordshire
Pedestrian	351	329	149
Pedal cyclist	283	172	101
Motorcyclist	268	148	143
Car occupant	1437	1450	1004
Bus or coach occupant	50	28	17
Van/light goods occupant	65	62	48
HGV occupant	13	15	23
Other vehicle occupant	16	16	15
All casualties	2483	2220	1500

Table 5 Casualty rate per million population (gov.uk, 2020)

Table 34 shows that Newcastle-under-Lyme, included in data for Staffordshire, is below the casualty rate per one million of the population in all accident categories besides HGV occupant. It can also be seen that West Midlands as a region is below the England average rate for all categories besides car occupant and HGV occupant, and in line with other vehicle occupant.

Cycling and Walking

The Government invited all local transport authorities to publish Local Cycling and Walking Infrastructure Plans (LCWIPs) to help deliver their Cycling and Walking Investment Strategy (CWIS). Staffordshire County Council published theirs in February 2020 and this encompasses plans for Newcastle-under-Lyme.

It has been recognised that Newcastle-under-Lyme is the lowest performing in the county for walking zones. This is because of the inclusion of the ring road in the study. Further, it has

⁵² <https://www.who.int/news-room/fact-sheets/detail/road-traffic-injuries>

been noted that Newcastle-under-Lyme’s priority cycle network will be the most challenging to improve in the county as large sections are on heavy trafficked A roads.

It is considered that in order for Staffordshire County Council to help the government achieve its ambition of ‘Better Safety, Better Mobility and Better Streets’, £31m of investment is required up to 2030. This will include cycle networks and core walking zones in Newcastle-under-Lyme⁵³.

Sustainability Appraisal Objectives

Previous SA Objectives

Below are the SA objectives that have been previously used by Newcastle-under-Lyme Borough Council. These objectives were produced to assess the Joint Local Plan between Newcastle-under-Lyme and Stoke-on-Trent. As a result of the two councils deciding to produce Local Plans independent of each other, it has been decided that the below objectives should be updated.

1	To contribute to carbon reduction and adapt to a changing climate, including increasing the use of renewable energy and energy efficiency in existing, new development and redevelopment
2	To improve air quality, creating cleaner and healthier air
3	To ensure that there is an overall net gain in the extent and quality of biodiversity
4	To reduce contamination, regenerate degraded environments, re-use materials, and maintain soil, geological and land resources
5	To reduce the amount of development within locations at risk of flooding and promote the use of sustainable drainage systems
6	To increase the efficient use of water resources, improve water quality and meet the requirements of the Water Framework Directive
7	To conserve, enhance and promote interest in local distinctiveness, the historic environment, heritage, cultural assets and their settings
8	To strengthen the quality of the landscape and city townscape including historic landscape character in urban and rural areas, and deliver well designed development which respects local character and distinctiveness
9	To ensure the efficient use of mineral resources, including the recycling and reuse of existing materials where possible in order to limit the use of primary aggregates and to safeguard their supply

⁵³ Staffordshire County Council Local Cycling and Walking Infrastructure Plan 2020-2030 (February, 2020)

10	Maintain and enhance quality and accessibility of green space
11	Encourage schemes that contribute to self-sufficiency in waste treatment and encourage local communities to take responsibility for the waste that they generate
12	To provide housing choice and help meet the housing needs of the whole community
13	To increase life expectancy and improve the health and mental well-being of the population overall
14	To provide a more equitable society where the provision of the widest possible range of community, cultural, educational, health, recreational and leisure facilities, and access to public transport are available to all sectors of the population with particular emphasis on deprived neighbourhoods
15	Reduce crime and the fear of crime
16	To reduce the need to travel while increasing transport choice and accessibility for all
17	To enable access to the widest range possible of shopping and commercial services for the resident population
18	To provide a range of employment land and premises that meets the needs of the business community and tackles socio- economic inequalities within the population
19	To protect and enhance the vitality and viability of the city, town and district centres within the urban areas and village centres in the rural area
20	To provide a safe, efficient transport network and increase the use of public transport, cycling and walking.

Amendments to SA Objectives

The previous SA objectives have been reviewed and updated to take in to account the updated baseline data and plans and programmes, as well as the move from a Joint Local Plan to an independent Local Plan for the borough.

Consultation on the draft SA Scoping Report took place with the Environmental Agency, Historic England and Natural England, as well as with Staffordshire County Council in May 2021. Following the comments received from these consultation bodies, the SA objectives and indicators were revised in order to produce the final SA Scoping Report.

Changes arising from the update to the baseline data

The below changes were observed in the baseline data, and were used to determine the changes needed to the sustainability appraisal scoping report objectives. If the changes in data are already covered by an existing objective, it is noted below. If they are not, the relevant updated objective number and text have been presented.

Changes observed	Addressed by existing objective	Updated objective number	Updated objective
A need for higher paid jobs	18		
A need to improve public transport provision and satisfaction levels	16, 20		
An increase in listed buildings	7, 8		
An increase in local listings	7, 8		
Housing for first time buyers/help to buy/affordable housing	12		
The post Covid-19 high street		19	To protect and enhance the vitality and viability of the strategic, town, district and rural centres within the urban and village areas
Increase in mental health cases and suicides	13		
High cases of diabetes and cardiovascular diseases	13		
Decrease in female life expectancy	13		
Increase in childhood obesity	13		
Highest excess winter death	13		

between 2016-18 since 1990			
-------------------------------	--	--	--

Changes arising to the objectives from the consultation with statutory organisations

The detailed comments from consultees along with a response from the Borough Council officers, and reasons for any change is provided in Appendix A.

Original Objective	Revised Objective
1. To contribute to carbon reduction and adapt to a changing climate, including increasing the use of renewable energy and energy efficiency in existing, new development and redevelopment.	1. To contribute to carbon <u>the reduction of greenhouse gases</u> and adapt to a changing climate, including increasing the use of renewable energy and energy efficiency in existing, new development and redevelopment.
10. Maintain and enhance quality and accessibility of green space.	10. Maintain and enhance <u>the quality, and accessibility and connectivity</u> of green <u>open</u> space <u>and blue and</u> green infrastructure.

New SA Objectives

The SA objectives and baseline data have been structured in a way that is considered to clearly reflect the principles of sustainability set out in the NPPF, which seeks to achieve a balance of the social, economic and environmental aspects of planning.

These new objectives will be used to undertake the sustainability appraisals for each stage of the new Local Plan preparation process, as well as for other planning policy documents such as Supplementary Planning Documents (SPDs).

The SA assessment at each stage of the Local Plan preparation process will be undertaken by the SA team of officers from Newcastle-under-Lyme Borough Council.

The below table (Table 35) outlines the new Sustainability Appraisal Scoping Report Objectives which will be used when assessing future plans and policies. The table shows which NPPF theme the objective addresses and outlines questions which will aid the assessment of proposals and policies.

New Objective	NPPF Theme	Decision aiding questions: Will the option ...
1. To contribute to the reduction of greenhouse gases and adapt to a changing climate, including increasing the use of renewable energy and energy efficiency in existing, new development and redevelopment	<p>Social – this objective will help to improve the overall quality of life and health of the community and future generations.</p> <p>Environmental – this objective will help to mitigate climate change.</p>	<ul style="list-style-type: none"> • Help to reduce emissions? • Help to reduce the need for energy use? • Help facilitate and encourage the use of renewable energy? • Aid the council’s plan to adapt to climate change?
2. To improve air quality, creating cleaner and healthier air	<p>Social – improvements in air, noise and light pollution will help to support the health of the community.</p> <p>Environmental – help to mitigate climate change whilst improving biodiversity.</p>	<ul style="list-style-type: none"> • Reduce air, noise and light pollution? • Help to improve air quality? • Reduce pollution from traffic and public transport? • Reduce emissions from buildings?
3. To ensure that there is an overall net gain in the extent and quality of biodiversity	<p>Social – this objective will support the community’s health and mental wellbeing.</p> <p>Environmental – to conserve and enhance biodiversity in the borough.</p>	<ul style="list-style-type: none"> • Mitigate the effects of climate change on biodiversity? • Defend and enhance endangered/protected species? • Protect and enhance designated biodiversity and conservation areas? • Ensure new developments will not negatively impact biodiversity?
4. To reduce contamination, regenerate degraded environments, re-use materials, and maintain soil, geological and land resources	<p>Social – ensure the protection of green spaces and agricultural land for the economy.</p> <p>Economic – the protection of agricultural land will aid the rural economy.</p>	<ul style="list-style-type: none"> • Reduce the risk of land contamination? • Ensure new development does not cause further contamination? • Protect soils and prevent soil erosion? • Steer new development away from good quality agricultural sites? • Help to remediate contaminated land?

	Environmental – protection and enhancement of the natural environment.	
5. To reduce the amount of development within locations at risk of flooding and promote the use of sustainable drainage systems	<p>Social – reduce the possible negative impacts of flooding on the community’s mental and physical health.</p> <p>Economic – this objective will help to make new and existing developments and businesses resilient to flooding.</p> <p>Environmental – communities will be resilient to the changing climate.</p>	<ul style="list-style-type: none"> • Reduce the risk of fluvial, surface water, groundwater and sewer flooding to existing and new developments? • Discourage development in areas at risk of flooding? • Encourage the use of sustainable drainage systems? • Help to reduce the rate of run-off from new developments?
6. To increase the efficient use of water resources, improve water quality and meet the requirements of the Water Framework Directive	<p>Social – ensure healthy drinking water to the community.</p> <p>Environmental – this objective will ensure water pollution is minimalised and that water resources are not overused.</p>	<ul style="list-style-type: none"> • Improve water quality and maintain a sufficient supply of water? • Reduce pollution of groundwater, watercourses and rivers from run-off? • Reduce the amount of nitrates/phosphates entering the water environment? • Provide adequate utilities infrastructure to service development to avoid impacts on the environment? • Safeguard water resources to maintain an adequate level of river and ground water? • Reduce the demand for water? • Encourage water to be stored for re-use?
7. To conserve, enhance and promote interest in local distinctiveness, the historic environment and landscapes, heritage,	Social - this objective will help to ensure the plan area maintains and develops a high quality built and natural environment.	<ul style="list-style-type: none"> • Enhance the historic and cultural assets? • Protect registered parks and gardens? • Protect and enhance the character and

cultural assets and their settings	Economic – high quality environments will encourage visitors and further investment to the plan area.	appearance of conservation areas? <ul style="list-style-type: none"> • Improve access to the borough’s cultural and historical assets? • Promote the sensitive re-use of important buildings?
8. To strengthen the quality of the landscape and urban townscape and deliver well designed development which respects local character and distinctiveness	Social – high quality developments for the use of the borough’s residents. Economic – high quality developments will encourage further investments in the future. Environmental – development which does not have a negative impact on its surrounding environments.	<ul style="list-style-type: none"> • Ensure new development is in keeping with the surrounding character and distinctiveness?
9. To ensure the efficient use of mineral resources, including the recycling and reuse of existing materials where possible in order to limit the use of primary aggregates and to safeguard their supply	Social – support overall quality of life for current and future generations. Economic – protects natural resources which will aid businesses in the future. Environmental – this objective will assist in the protection of the local environment.	<ul style="list-style-type: none"> • Encourage the efficient use of mineral resources? • Reduce the use of primary resources and create a market for recycled materials? • Encourage the use and supply of sustainable local products or services? • Help businesses to reduce the environmental impact of products and services?
10. Maintain and enhance the quality, accessibility and connectivity of open space and blue and green infrastructure.	Social – improve the quality of life of the local community as open/green space improves the physical and mental wellbeing of residents. Environmental – maintain and enhance the quality of	<ul style="list-style-type: none"> • Encourage access to natural urban and rural green space?

	the borough's green and open spaces.	
11. Encourage schemes that contribute to self-sufficiency in waste treatment and encourage local communities to take responsibility for the waste that they generate	Environmental – this objective will minimise the amount of waste being produced and how it is managed, therefore benefiting the local environment.	<ul style="list-style-type: none"> • Minimise the production of waste? • Encourage the reuse and recycling of materials? • Allow waste to be managed close to where it is produced/collected? • Encourage residents to use natural resources?
12. To provide housing choice and help meet the housing needs of the whole community	<p>Social – providing a housing supply to meet the needs of both the present and future generations</p> <p>Economy – the construction of housing developments will help to boost the local economy and employment markets, as well as attract further investment to the area.</p>	<ul style="list-style-type: none"> • Boost the supply of housing? • Improve the availability and quality of the housing stock? • Provide affordable housing for first time buyers? • Provide suitable allocations for gypsies and travellers? • Provide extra-care accommodation for the elderly?
13. To increase life expectancy and improve the health and mental well-being of the population overall	Social – this objective will help to support a thriving community which is strong, healthy and safe.	<ul style="list-style-type: none"> • Help to improve the overall health of the community? • Help to improve the mental wellbeing of the community? • Improve access to healthcare provisions? • Encourage healthy lifestyles? • Help the community to remain independent and provide assistance to the elderly, those with ill health and those with a disability?
14. To provide a more equitable society where the provision of the widest possible range of community, cultural,	Social – improving the quality of life of the community by lessening social exclusion, deprivation and poverty.	<ul style="list-style-type: none"> • Ensure accessibility to community facilities? • Help overcome social exclusion? • Help address the issues of deprivation and poverty?

<p>educational, health, recreational and leisure facilities, and access to public transport are available to all sectors of the population with particular emphasis on deprived neighbourhoods</p>	<p>Economic – this objective will help the local economy as it will help to build a strong, healthy and resilient community.</p>	
<p>15. Reduce crime and the fear of crime</p>	<p>Social – improving the quality of life for the community. Economic – lower crime rates will increase the number of visitors and businesses investing in the area.</p>	<ul style="list-style-type: none"> • Continue to reduce the levels of crime in the borough? • Improve the feeling of safety amongst the community?
<p>16. To reduce the need to travel while increasing transport choice and accessibility for all</p>	<p>Social – improve the quality of life by improving accessibility across the borough. Economic – ensuring accessible transport for all will help improve the connectivity of the borough and thus, the economy. Environmental – reducing the need to travel will benefit the local environment.</p>	<ul style="list-style-type: none"> • Lessen the need for travel? • Improve the choice of transport available?
<p>17. To enable access to the widest range possible of shopping and commercial services for the resident population</p>	<p>Social – improving the quality of life for residents by ensuring access to the necessary services and facilities. Economic – this objective will help to ensure a strong local economy after the fall</p>	<ul style="list-style-type: none"> • Support both existing and new businesses? • Support high streets and businesses in a post Covid-19 environment? • Encourage local businesses?

	out of Covid-19 as well as strengthening retail and leisure areas throughout the borough.	
18. To provide a range of employment land and premises that meets the needs of the business community and tackles socio-economic inequalities within the population	<p>Social – a thriving local economy will help support a strong community.</p> <p>Economic – this objective will help to produce a strong and healthy workforce which can respond to local changes.</p> <p>Environmental – a stronger local economy will reduce the need for residents to commute out of the borough for employment, thus benefiting the local environment.</p>	<ul style="list-style-type: none"> • Provide for the needs of the economy, especially local businesses? • Encourage diversity and quality of employment types? • Encourage the provision of higher paid employment? • Provide for the needs of business in both rural and urban settings? • Encourage local jobs being filled by local people? • Encourage rural diversification?
19. To protect and enhance the vitality and viability of the strategic, town, district and rural centres within the urban and village areas	<p>Social – providing the community with successful service and facility areas.</p> <p>Economic – this objective will help to strengthen and improve the resilience of the borough’s highstreets, particularly in the fall out of the Covid-19 pandemic.</p>	<ul style="list-style-type: none"> • Support high streets and businesses in a post Covid-19 environment?
20. To provide a safe, efficient transport network and increase the use of public transport, cycling and walking.	<p>Social – a well-established public transport system will improve access to local services and facilities.</p> <p>Economic – a successful public transport system will help support the local economy by improving</p>	<ul style="list-style-type: none"> • Reduce the need to travel by private vehicle? • Encourage the provision of charging infrastructure for electric vehicles? • Provide walking/cycling/public transport infrastructure? • Provide safe walking and cycling routes?

	<p>connectivity in to the borough.</p> <p>Environmental – sustainable transport will mitigate climate change.</p>	<ul style="list-style-type: none"> • Improve access to key services and facilities (education, employment, healthcare, retail, leisure and cultural assets)? • Reduce existing congestion and mitigate future increases? • Improve access to natural greenspaces? • Improve the provision of affordable public transport?
--	--	---

Table 35: New SA Objectives

Site Appraisal Framework

A framework for assessing site options has also been developed using the SA Framework as a basis for identifying relevant criteria.

The task of forecasting effects is challenging due to the high-level nature of the SA Objectives, the number of site options and the potential for effects to be mitigated at planning application stage. Nonetheless, it is important to assess sites using a range of quantitative data, as this allows for a consistent and objective comparison between different site options. This data can be then be supplemented with qualitative assessments.

The Site Appraisal Framework is set out on the following pages.

Presenting Findings

The appraisal of each site option will be set out in a table. Account is taken of the nature of effects (including magnitude, spatial coverage and duration), the sensitivity of receptors, and the likelihood of effects occurring. The appraisal identifies and evaluates 'likely effects' against the baseline position of a site being left undeveloped. For each SA Objective, significant positive and negative effects are identified:

- ✓✓ Major positive effect
- ✓ Positive effect
- ✓ X Mixed effect
- 0 Neutral effect
- ? Effect unknown or uncertain
- I Dependent on implementation
- X Negative effect
- XX Major negative effect

In order to ensure the site selection criteria effectively shows differentiation between the sites to clearly highlight more sustainable options and significant effects, and to avoid repetition between several criteria, an attempt has been made to narrow the focus of the criterion. For example, there are many factors that could contribute to carbon reduction and adapting to a changing climate (SA criterion 1) which are captured by other objectives, therefore the site selection score against this objective is focused on renewable energy, as other relevant factors such as accessibility and flood resilience are covered by other SA criteria (criterion 5 and 16 respectively).

In most cases for each SA Objective there are several criteria against which effects will be judged. The overall effect for each SA Objective will need to balance the outcomes of these criteria. There is some overlap between SA Objectives and therefore some criteria are used more than once.

A summary of the site appraisal findings for each site will be presented for each of the character areas in the Local Plan.

Reasonable Alternatives

The Strategic Housing Land Availability Assessment (SHLAA) identifies potential future housing sites and assess whether such sites are capable of being developed in order to help demonstrate a future supply of sites. In accordance with national guidance, Newcastle-under-Lyme Borough Council and Stoke-on-Trent City Council invited key stakeholders, such as local housing developers, key local landowners and adjoining local authorities to help prepare a robust assessment of housing land availability across the two local authority areas.

The SHLAA is a comprehensive audit of available sites and therefore includes all reasonable alternative housing site options.

	Sustainability Appraisal Objective	Notes	Criteria	✓✓	✓	0	X	XX
1	To contribute to the reduction of greenhouse gases and adapt to a changing climate, including increasing the use of renewable energy and energy efficiency in existing, new development and redevelopment.	The planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk (SA objective 5). It should help to shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the	Helps increase the use and supply of renewable and low carbon energy and heat. Sites will be considered for energy generating potential against the findings of the Staffordshire County-wide Climate Change Adaption and Mitigation Study 2020.	Site proposal is known and will deliver renewable and low carbon energy and associated infrastructure	Known opportunities to draw energy supply from decentralised , renewable or low carbon energy supply systems.	N/A – If the effect is unknown it will be scored as (I) dependent on implementation	Development will sterilise land with high potential suitability for renewable energy scheme	Development of site will result in a loss of a renewable energy scheme in use

	Sustainability Appraisal Objective	Notes	Criteria	✓✓	✓	0	X	XX
		conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.						
2	To improve air quality, creating cleaner and healthier air.	Sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas (AQMA) and the cumulative impacts from individual sites in local areas.	Air Quality Management Area (AQMA). A list of authorities with AQMA's can be found from: https://uk-air.defra.gov.uk/aqma/list	Site proposal is known and will improve air quality	Opportunities to improve air quality or mitigate impacts through traffic & travel management and green infrastructure provision & enhancement	Not within an AQMA	Within AQMA	Site proposal is known and will reduce air quality

	Sustainability Appraisal Objective	Notes	Criteria	✓✓	✓	0	X	XX
		Potential for all Stoke sites to be scored negatively.						
3	To ensure that there is an overall net gain in the extent and quality of biodiversity.	Need to consider the opportunities that sites may provide to conserve and enhance biodiversity and geodiversity, and contribute to habitat connectivity in the wider area.	Consideration of the potential for biodiversity net gain as well as loss of biodiversity and impact on designated areas: RAMSAR, Special Areas of Conservation (SAC) and Special Protection Areas (SPA), Site of Special Scientific Interest (SSSI), Local Nature Reserve (LNR), National Nature Reserve (NNR), Local Wildlife Sites (LWS), Regionally Important	Site proposal is known to deliver significant net gain in biodiversity	Site delivers measurable improvements for biodiversity by creating or enhancing habitats.	No impact on designated nature conservation site, and no potential to enhance biodiversity.	Partial loss of designated nature conservation site.	Loss of designated nature conservation site.

	Sustainability Appraisal Objective	Notes	Criteria	✓✓	✓	0	X	XX
			Geological Sites (RIGS). Also, Ancient Woodland, Veteran trees and peatlands such as Cranberry Bog and Chorlton Moss					
4	To reduce contamination, regenerate degraded environments, re-use materials, and maintain soil, geological and land resources.	Recognises the economic and other benefits of the best and most versatile agricultural land. Opportunities for remediating and mitigating despoiled, degraded, derelict, contaminated and unstable land. support the re-use of brownfield land	Previously developed land or green field land. Best and most versatile agricultural land: Land in grades 1, 2 and 3a of the Agricultural Land Classification.	Previously developed land with opportunities for remediating despoiled, degraded, derelict, contaminated or unstable land.	Previously developed land	N/A	Grade 3, 4 and 5 , Greenfield	Grade 1 and 2, Greenfield
5	To reduce the amount of development within	Inappropriate development in	Fluvial Flood Risk and Surface Water	Flood Zone 1 and/or	Developable part of the		Partly Flood Zone 2/3	Mostly Flood Zone 2/3

	Sustainability Appraisal Objective	Notes	Criteria	✓✓	✓	0	X	XX
	locations at risk of flooding and promote the use of sustainable drainage systems.	areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future).	Flood Risk (including minor watercourses <3km2 catchment not modelled by the flood zones)	development proposal demonstrates a reduction in flood risk	site in Flood Zone 1		and/or known Surface water issues affecting part of the site	and/or known surface water issues that covers most of the site and/or may fall in a hotspot/ CDA.
6	To increase the efficient use of water resources, improve water quality and meet the requirements of the Water Framework Directive.	Protection of inland surface waters and groundwater.	Drinking Water Safeguard Zones (Surface Water). Source Protection Zones.	Known proposal which will improve the ecological status of a water body under the Water Framework Directive	Not within Drinking Water Safeguard Zone and/or Not within Outer or Inner Protection Zone		Within Outer Source Protection Zone	Within Drinking Water Safeguard Zone and/or Inner Source Protection Zone

	Sustainability Appraisal Objective	Notes	Criteria	✓✓	✓	0	X	XX
7	To conserve, enhance and promote interest in local distinctiveness, the historic environment and landscapes, heritage, cultural assets and their settings.	Designated heritage asset: A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. It includes designated heritage assets and assets identified by the local planning authority (including local listing). Non-designated asset:	Designated Heritage Asset and Non-designated Heritage Asset and Setting.	Site presents opportunity to conserve and enhance designated or non-designated heritage asset or setting of historic asset at high risk (in terms of ownership, occupancy and condition)	Site presents opportunity to conserve and enhance designated or non-designated heritage asset or setting of historic asset at risk (in terms of ownership, occupancy and condition)	No heritage assets present or site would present no risk to designated or non-designated heritage assets, historic landscape/townscape	Asset not at risk and could lose significance as result of development and/or negative effect on the historic environment and historic landscape/townscape	Asset not at risk and threatened by demolition as part of development and/or significant negative effect on the historic environment and historic landscape/townscape

	Sustainability Appraisal Objective	Notes	Criteria	✓✓	✓	0	X	XX
		e.g. buildings of special local interest, sites of archaeological interest						
8	To strengthen the quality of the landscape and urban townscape and deliver well designed development which respects local character and distinctiveness.	Sites should be sympathetic to local character, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change. The North Staffordshire Green Belt boundary was originally defined in 1967. The fundamental aim of	Landscape/townscap e/historic Character Joint Local Plan Green Belt Assessment November 2017 (note: score against Green Belt category overrides score for landscape/townscap e/historic character for Green Belt sites)	Very Low Area of Landscape/ townscape/ historic Quality. Not in Green Belt	Low Area of Landscape Quality. Not in Green Belt.	N/A	Moderate Area of Landscape Quality. Weak overall contribution to the Green Belt	High or Very High Area of Landscape Quality. Moderate or Strong overall contribution to the Green Belt

	Sustainability Appraisal Objective	Notes	Criteria	✓✓	✓	0	X	XX
		Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.						
9	To ensure the efficient use of mineral resources, including the recycling and reuse of existing materials where possible in order to limit the use of primary aggregates and to safeguard their supply.	Known locations of specific minerals resources of local and national importance should not be sterilised by non-mineral development where this should be avoided.	Mineral Safeguarding Area designated by minerals planning authorities which covers known deposits of minerals which should be safeguarded from unnecessary sterilisation by non-mineral development. Infrastructure sites used for the	Site proposal is known and will deliver efficient minerals extraction	Site is not in a mineral safeguarding area	N/A	Site is in a mineral safeguarding area	Site is in the immediate vicinity of, or in an existing or allocated mineral site

	Sustainability Appraisal Objective	Notes	Criteria	✓✓	✓	0	X	XX
			processing, handling, and transportation, of minerals are also essential to ensure a steady supply. They should also be safeguarded where non-mineral development might otherwise affect their continued operation					
10	Maintain and enhance the quality, accessibility and connectivity of open space and blue and green infrastructure.	Access to a network of high-quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities.	Provision to access to sports and recreation. Public Rights of Way have always been a valuable public resource giving people access to the countryside, parks, open space, local shops, services and places of work, for	Provision of open/recreational space or blue/green infrastructure in an area of deficiency.	Provision of open/recreational space or blue/green infrastructure in an area of good or adequate supply or opportunity to improve the quality,	Not open/recreational space or blue/green infrastructure, or no effect.	Loss of open/recreational space or blue/green infrastructure in an area of surplus or loss of poor quality site.	Loss of open/recreational space or blue/green infrastructure in an area of need, or loss of good quality site.

	Sustainability Appraisal Objective	Notes	Criteria	✓✓	✓	0	X	XX
			<p>simple recreation and for the practical necessities of life. Increasing emphasis is now being placed on paths as a sustainable and healthy alternative to the motor vehicle for local journeys allowing people to avoid the busy road network.</p>		<p>accessibility and/or connectivity of open/recreational space or blue/green infrastructure</p>			
11	Encourage schemes that contribute to self-sufficiency in waste treatment and encourage local communities to take responsibility for the waste that they generate.	The National Assessment of Civic Amenity Sites recommendations for minimum levels of Household Waste Recycling Centre provision:	Access to Household Waste Recycling Centre. Waste management facilities, and waste management infrastructure should be safeguarded from other forms of	Nearest Recycling and Household Waste Site within 10min drive time	Nearest Recycling and Household Waste Site 10-20min drive time (10-30mins in rural areas).		Nearest Recycling and Household Waste Site more than 20min drive time (30mins	Site would directly affect waste management facilities or infrastructure

	Sustainability Appraisal Objective	Notes	Criteria	✓✓	✓	0	X	XX
		<p>Maximum driving times to a site for the great majority of residents of 20 minutes in urban areas, and 30 minutes in rural areas; though preferably less than this by the order of 10 minutes in each case.</p> <p>Effective waste management relies on the availability of a network of appropriate facilities to receive, sort and treat waste. The continued operation, or</p>	<p>development which might otherwise affect their continued operation.</p>				<p>in rural areas).</p>	

	Sustainability Appraisal Objective	Notes	Criteria	✓✓	✓	0	X	XX
		expansion of such sites can be compromised by encroachment of other forms of development.						
12	To provide housing choice and help meet the housing needs of the whole community	The supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns. Small and medium sized sites can also make an important contribution to meeting the	Scale of development and proposal, if known.	The needs of groups with specific housing requirements will be met. In rural areas, site supports housing development that reflect local needs.	Site allows for the size, type and tenure of housing needed for different groups in the community (including, but not limited to, those who require affordable housing,	Site for any other use	Not major housing development (less than 10 or more homes, or the site has an area of less than 0.5 hectares).	Site proposal is known and will result in a loss of housing

	Sustainability Appraisal Objective	Notes	Criteria	✓✓	✓	0	X	XX
		housing requirement of an area and are often built-out relatively quickly. Provision of affordable housing should not be sought for residential developments that are not major developments.			families with children, older people, students, people with disabilities).			
13	To increase life expectancy and improve the health and mental well-being of the population overall.	Principles for Putting Health into Place. Consider prevention, health protection and accessibility to health care provision when assessing sites for housing.	Good access to health care and facilities.	Potential for on-site provision of health facilities	Walking distance to healthcare 200m or less	Walking distance to healthcare 200-400m	Walking distance to healthcare 800m	No walkable access to healthcare

	Sustainability Appraisal Objective	Notes	Criteria	✓✓	✓	0	X	XX
14	To provide a more equitable society where the provision of the widest possible range of community, cultural, educational, health, recreational and leisure facilities, and access to public transport are available to all sectors of the population with particular emphasis on deprived neighbourhoods.	Create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.	Areas of Deprivation	Allocations in a deprived area which provide opportunities to provide a safer and more inclusive community and that promotes well-being.	Sites with the potential to support regeneration and investment in deprived communities particularly through the development of brownfield sites.	Sites outside deprived areas.	Site proposal is known and would result in a loss of community, cultural, educational, health, recreational and leisure facilities, or reduce access to public transport	Site proposal is known and could lead to further segregation in society e.g. gated community in a deprived area
15	Reduce crime and the fear of crime.	Crime and disorder, and the fear of crime, do not undermine the quality of life or community	Creating safe and attractive environments.	Opportunity to create a safer and more attractive environment	Opportunity to create a safer and more attractive environment.		Location of site or known proposal does not provide the opportunity	Site proposal is known and has potential to increase crime, for example due

	Sustainability Appraisal Objective	Notes	Criteria	✓✓	✓	0	X	XX
		cohesion – for example through the use of clear and legible pedestrian routes, and high-quality public space, which encourage the active and continual use of public areas.		by redeveloping land that may be subject to fly-tipping or redeveloping vacant and under-used buildings that may provide opportunities for vandalism and anti-social behaviour.			to create a safer and more attractive environment.	to the use of the site, operational hours, proximity to other similar uses, or issues with location, layout and negative impact on existing design and access of surrounding area.

	Sustainability Appraisal Objective	Notes	Criteria	✓✓	✓	0	X	XX
16	To reduce the need to travel while increasing transport choice and accessibility for all.	Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health. The Institute of Highways and Transportation's "Providing for Journeys on Foot" contains at table 3.2, suggested	Accessibility to services including: 1. Public Transport, 2. Community Centres, 3. Sports and recreation facilities, 4. Schools (primary and secondary), 5. Public house, 6. Post office, 7. GP, 8. Employment.	Walking distance to all facilities, 500m or less	Walking distance to the majority (5 or more) of facilities, 800m or less	Walking distance to at least 3 of facilities, 800m or less	Walking distance to at least 3 of facilities, 2000m or less	Limited access to facilities within walking distance.

	Sustainability Appraisal Objective	Notes	Criteria	✓✓	✓	0	X	XX
		acceptable walking distances, for pedestrians without mobility impairment for some common facilities. Only applies to residential sites.						
17	To enable access to the widest range possible of shopping		Convenience store	Allocation of a retail use	Walking distance to convenience	Walking distance to convenience	Walking distance to convenience	Proposal would result

	Sustainability Appraisal Objective	Notes	Criteria	✓✓	✓	0	X	XX
	and commercial services for the resident population.				store 200m or less	store 200-800m	store more than 800m	in the loss of a retail use
18	To provide a range of employment land and premises that meets the needs of the business community and tackles socio-economic inequalities within the population.	Planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt. Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.	Allocation of employment land	Allocation of sites for higher value employment use.	Allocation of site for employment development.	Development of a site without the loss of employment	Loss of employment.	Loss of employment site identified for retention.
19	To protect and enhance the vitality	Sites should support the role	Access to centre, as measured to the	Site lies within centre	Site lies within 800m		Nearest identified	Known proposal may

	Sustainability Appraisal Objective	Notes	Criteria	✓✓	✓	0	X	XX
	and viability of the strategic, town, district, neighbourhood and rural centres within the urban and village areas.	that town and village centres play at the heart of local communities. The Sub-Regional Shopping Hierarchy includes Stoke City Centre (Regional), Newcastle-under-Lyme (Major District), Longton Town Centre (Major District), Festival Retail & Leisure Park (District), Affinity Outlet Mall (Freeport Talke) (Minor District) and local centres.	centre point of facilities and services	and offers opportunity to improve its vitality and viability.	of identified centre.		centre is more than 800m away.	result in a loss of services and facilities in a defined centre.

	Sustainability Appraisal Objective	Notes	Criteria	✓✓	✓	0	X	XX
20	To provide a safe, efficient transport network and increase the use of public transport, cycling and walking.	Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes. This can help to reduce congestion and emissions, and improve air quality and public health. The Institute of Highways and Transportation's "Providing for Journeys on Foot" contains at table 3.2, suggested	Access to a range of sustainable transport solutions, or potential to create new route/connections, including: bus services, cycle routes, train stations	Access to all within 300m or the potential to create new links and connections	Access to all within 300m	Access to all within 300-400m	Access to some within 400m	Access to none within 400m

	Sustainability Appraisal Objective	Notes	Criteria	✓✓	✓	0	X	XX
		acceptable walking distances, for pedestrians without mobility impairment for some common facilities.						

Appendix A: Response from Statutory Consultees

Table showing the response from Statutory Consultees on an early draft of the SA Scoping Report and how their comments have been addressed in the final SA Scoping Report, including whether this has resulted in any changes to the report.

Organisation	Comment	Response	change
Environment Agency (EA)	<p>Flood Risk</p> <p>Local Plan policies on flood risk should consider the Humber Flood Risk Management Plan (FRMP) available here: https://www.gov.uk/government/publications/humber-riverbasin-district-flood-risk-management-plan. We welcome the inclusion of the Humber, North Western District and Severn FRMPs in the SA Scoping Report.</p>	Noted – as recognised in the comment we have considered the FRMP at the Scoping stage and will do so when developing policy.	x
EA	Managing and reducing flood risk should be an integral part of any regeneration and growth plans within the Plan area which includes the Lyme Brook as well as a number of their tributaries. Local Plan policies should seek to not only mitigate flood risk but adapt to the impacts of climate change by encouraging a reduction in flood risk from development.	SA Objective 5 seeks to reduce the amount of development within locations at risk of flooding. SA Objective 1 seeks to contribute to carbon reduction and adapt to a changing climate. As such, this topic area is covered by the SA objectives. This will help to ensure that any Local Plan policy contributes positively towards these objectives.	x
EA	Flood risk from all sources of flooding will need to be considered as part of this Local Plan, as required under	Different sources of flooding and the findings of the SFRA Level 1 have been considered in the baseline	x

Organisation	Comment	Response	change
	<p>NPPF paragraph 156, taking into account the predicted impacts of climate change. We note, a Level 1 Strategic Flood Risk Assessment (SFRA) was published January 2019. The SFRA provides a number of policy recommendations which should inform Local Plan policies on flood risk and outlines requirements on the application of the Sequential Test and Exception Test. It is important that any policies within the Local Plan aim to reduce flood risk and ensure any new development is not at risk both now and in the future due to climate change.</p>	<p>data section of the Scoping Report. As stated above, SA Objectives 1 and 5 will help to ensure policies within the Local Plan aim to reduce flood risk and ensure any new development is not at risk both now and in the future due to climate change.</p>	
EA	<p>A Level 2 SFRA must be produced if any site allocations within the Flood Zones 2 and / or 3 and require the Exception Test are brought forward. This will outline the principles for development to manage flood risk grounds as required under the Exception Test.</p>	<p>Noted, site allocations will be determined in the Publication Draft. We aim to avoid flood risk areas in the first instance but allocations will be supported by an SFRA Level 2, if required.</p>	x
EA	<p>Where sites are at least partially affected by mapped floodplain, design and layout should steer development away from these Flood Zones in line with the NPPF and supporting SFRA. Where detailed modelling has not been provided for the latest climate change scenarios, consideration should be given to undertaking such work as part of the SFRA process.</p>	<p>Consideration will be given to updating the Level 1 SFRA, if required, to take into account new modelling data following the Issues and Options consultation. This exercise is not likely to result in changes to the Scoping Report or SA Objectives as these already seek to reduce risks from flooding and adapt to a changing climate.</p>	x

Organisation	Comment	Response	change
EA	In all locations, further assessment should be undertaken to determine whether there is flood risk elsewhere in the catchment which would benefit from being reduced as part of the development, and also whether there may be opportunities to provide that betterment as part of the scheme or not.	Noted, whilst not a matter for consideration of the SA Scoping Report, this may inform a policy approach.	x
EA	Development should maintain at least an 8 metre easement between all built development and the top of the bank of watercourses to allow for maintenance and inspection requirements. In addition, as the frequency and severity of flooding is set to increase due to the impacts of climate change, this brings increased maintenance requirements of watercourses and flood defences.	Noted, whilst not a matter for consideration of the SA Scoping Report, this may inform a policy approach.	x
EA	Under Objective 5, consideration should be given to providing buffer zones from watercourses to allow maintenance of watercourses and resilience from the impacts of climate change. Further to this, we advise for the assessment of a 'Major positive effect' under the SA Framework, developments should demonstrate a reduction in flood risk and not only 'mitigate' risk of surface water flooding.	The comment refers to the assessment criteria which the Council intends to use to assess potential site allocations. As such, it is not always known what the specific proposal is at the site allocations stage and therefore the potential for a buffer from watercourses is more likely to be a requirement written into the site allocations policy (where applicable). The major positive effect is used where the site is wholly in Flood	✓

Organisation	Comment	Response	change
		Zone 1. To account for this comment it has been amended to state 'Flood Zone 1 and/or development <u>proposal demonstrates a reduction in flood risk opportunity to mitigate any risk of surface water flooding</u> '	
EA	<p>Climate Change Allowances Update</p> <p>The Environment Agency is in the process of updating the allowances for peak river flow and Flood risk assessments: climate change allowances following research completed in 2020. This research sought to better understand how different river catchments respond to changes in rainfall due to climate change within river basin districts. It uses the latest rainfall projections in UKCP18. We are currently developing new allowances that represent the findings of this research, but are also user friendly. We anticipate that the new peak river flow allowances will be published in mid-2021. When they are published we will provide an updated briefing to explain the changes. If you are in the process of updating your SFRA or are aware of FRAs that are being prepared for developments that are likely to be determined in the second half of 2021,</p>	<p>Consideration will be given to updating the Level 1 SFRA, if required, to take into account new modelling data following the Issues and Options consultation. This exercise is not likely to result in changes to the Scoping Report or SA Objectives as these already seek to reduce risks from flooding and adapt to a changing climate.</p>	x

Organisation	Comment	Response	change
	<p>please contact your local Environment Agency area team for advice.</p>		
EA	<p>The Environment Agency is also in the process of updating the allowances for peak river flow in the Flood and coastal risk management projects, schemes and strategies: climate change allowances guidance, following research completed in 2020. A separate update will be produced and circulated in due course.</p>	<p>Noted, in due course consideration will be given to its applicability to Newcastle Under Lyme</p>	x
EA	<p>River Channels</p> <p>We recommend further emphasis on blue-green infrastructure and corridors as they provide multiple benefits to areas including services such as creating habitats, flood management provision, green space, cooling local temperatures, ecological function and amenity. All developments should create space for water by restoring floodplains and contributing towards blue-green infrastructure.</p> <p>Consequently, blue-green corridors need to be afforded high level of protection from encroaching development in order to facilitate their function, particularly when considering the impacts and need for extra capacity within watercourse corridors due to climate change.</p>	<p>Agree with the significance of blue-green infrastructure. SA criterion 10 has been amended to make specific reference to blue-green infrastructure and to make reference to connectivity of sites. The scoring assessment has also been amended to take this into account.</p>	✓

Organisation	Comment	Response	change
EA	Green spaces can be designed to be less formal areas with more semi-natural habitats. This will reduce maintenance costs and provide better biodiversity and water management potential in relation to the impacts of climate change.	Noted, whilst not a matter for consideration of the SA Scoping Report, this may inform a policy approach.	x
EA	Habitat connectivity will be particularly important in relation to climate change as species will need to be able to move more freely as environmental changes take place. Identifying specific opportunities could be informed by strategic plans like the Nature Recovery Network Map.	Noted, the amendments to criterion 10 and the site assessment criteria in relation to blue and green infrastructure should address this point by taking into account connectivity between habitats.	✓
EA	Deculverting of watercourses should be a standard policy primarily because it reduces flood risk and creates new ecological habitat (or recreates lost habitat). This will also allow more space to be freed up by for development because new development over culverts is not permitted and would need to remain undeveloped and open, and it can also reduce long-term management implications of the culvert. The new watercourse can be diverted to increase total length around the edge of developments which can provide extra flood event capacity and improve development layout.	Noted, whilst not a matter for consideration of the SA Scoping Report, this may inform a policy approach.	x

Organisation	Comment	Response	change
EA	<p>Water Framework Directive</p> <p>The Water Framework Directive (WFD) aims to protect and improve the water environment. Under the WFD there is a requirement for all waterbodies to meet 'Good Ecological Status or Potential' by 2027. The Plan must ensure that proposals do not jeopardise the current status of a WFD element or cause deterioration to a receiving waterbody.</p> <p>The Humber River Basin Management Plan (RBMP) should be included to reflect the current status of the water environment and to inform on the actions identified to bring your waterbodies up to Good Status as required by the WFD available here: https://www.gov.uk/government/publications/humber-river-basin-district-river-basinmanagement-plan. We welcome the inclusion of the Humber, North Western District and Severn RBMPs in the SA Scoping Report.</p>	<p>Noted – as recognised in the comment we have considered the RBMP at the Scoping stage and will do so when developing policy.</p> <p>SA criterion 6 specifically seeks to increase the efficient use of water resources, improve water quality and meet the requirements of the Water Framework Directive. It is therefore considered that the Scoping Report has adequately addressed this point</p>	x
EA	<p>We advise to determine a 'Major positive effect' from development under Objective 6 of the SA Framework, it should be specified that the development improves the</p>	<p>The assessment criterion has been amended in accordance with the suggested wording. However, it should be acknowledged it is rare at the point of site allocation to know the precise details of a scheme and</p>	✓

Organisation	Comment	Response	change
	<p>'Ecological Status' of a waterbody under the WFD as a clear indicator.</p>	<p>therefore it is difficult to score a major positive effect in relation to this category</p>	
EA	<p>Water Resources & Wastewater</p> <p>The Local Plan should consider the capacity and quality of water supply systems and any impact development may have on the environment, including understanding the supply and demand patterns now and in the future across the Plan area. We note a Water Cycle Study (WCS) was published in 2020 and should inform choices on levels of growth and distribution in relation to water and wastewater supplies.</p>	<p>The Local Plan will take this into account.</p> <p>Consideration will be given to updating the WCS, if required, particularly in relation to any changes to the quantum of housing in proximity to particular Waste Water treatment Works, where it is noted in the 2020 study that there may be issues with capacity.</p>	x
EA	<p>Regulated Sites</p> <p>Local plan policies should identify high risk regulated facilities, steer development away from such areas and ensure that if development is proposed in close proximity it is not of a 'sensitive' nature to such nuisances. Close liaison with the waste planning authority and the Environment Agency should be maintained to ensure the plan reflects joined-up working.</p> <p>Further to this, NPPF paragraph 182 requires safeguarding of regulated sites that could have an adverse effect on new development. 'Safeguarding' can</p>	<p>The Local Planning Authority consults with, invites comments and will set up meetings where required with the Environment Agency and has regular dialogue with Staffordshire County Council as the Minerals and Waste Planning Authority. The Local Planning Authority has access to records of safeguarded minerals and waste sites as well as water infrastructure such as Waste Water Treatment Works and considers this when assessing potential site allocations.</p>	x

Organisation	Comment	Response	change
	<p>also refer specifically to providing for appropriate future expansion of existing infrastructure. The NPPF now allows commercial properties to be converted to residential use, such as offices on industrial estates. It should be made clear that the Environmental Permitting Regulation does not demand ‘zero impact’, so where development is allowed too close, conflict may occur.</p>		
EA	<p>Waste</p> <p>Your plan should show how you have worked constructively alongside the Waste Planning Authority (WPA) to ensure waste management is considered alongside other spatial planning objectives. The timing and phasing of development should be synchronised with the delivery of appropriately located modern and sustainable waste management infrastructure that meets the needs of the local community. Opportunities to integrate waste management into proposed new development should be considered.</p> <p>Services provided should encourage and enable communities to follow the waste hierarchy – reduce, re-use, recycle, recover, with landfill as the last resort.</p> <p>Waste minimisation and resource efficiency should be at</p>	<p>The comments will be taken into account when developing the Local Plan and the Local Planning Authority continue to have regular dialogue with Staffordshire County Council as the Waste Planning Authority. The following SA criterion relate to these point:</p> <p>4. To reduce contamination, regenerate degraded environments, re-use materials, and maintain soil, geological and land resources.</p> <p>9. To ensure the efficient use of mineral resources, including the recycling and reuse of existing materials where possible in order to limit the use of primary aggregates and to safeguard their supply.</p> <p>11. Encourage schemes that contribute to self-sufficiency in waste treatment and encourage local</p>	x

Organisation	Comment	Response	change
	the heart of all new development. The design of buildings and supporting infrastructure should consider their future repair and eventual demolition in the selection of construction mechanisms and materials ('cradle to-cradle' design).	communities to take responsibility for the waste that they generate.	
EA	Surface Water Staffordshire County Council, as Lead Local Flood Authority, should be consulted regarding surface water issues and suitable measures to deal with surface water arising from development proposals required to minimise the impact to and from new development.	We maintain regular dialogue with Staffordshire County Council as Lead Local Flood Authority and they are involved with evidence creation including the Strategic Flood Risk Assessments.	x
Historic England (HE)	Page 14, we would recommend also including the National Planning Policy Framework and guidance documents which relate to heritage. In terms of a national perspective we would recommend that you include the Good Practice Advice Notes and Historic Environment Advice Notes, within this section. I include the link here which references the specific documents: https://historicengland.org.uk/advice/planning/planning-system/	Agreed, the document has been amended to include references to this guidance.	✓
HE	Under 'local environmental' on page 21 we would recommend that you include local heritage information	Agreed, the document has been amended to include references to these sources and research has been	✓

Organisation	Comment	Response	change
	such as the Staffordshire Historic Environment Record/ Newcastle under Lyme Local List/ are there any local or sub regional heritage strategies or programmes that can be included in this section? Public Realm Strategy or Infrastructure Strategy that seeks to enhance heritage?	undertaken to determine if there are any further sources.	
HE	Page 53, it would be useful to include what Grade the Registered Park and Gardens are.	Agreed, this has been actioned.	✓
HE	Page 54, are any of the Conservation Areas at risk? Do they all have up to date management plans?	Text added to clarify the Borough specific situation regarding these aspects.	✓
HE	We are supportive of the inclusion of a local list in the Council area and the intention to conserve local heritage.	Support noted.	x
HE	Is there any heritage at risk in the Borough? And how may the Local Plan address this?	The Borough Council conduct a Buildings at Risk Survey, with the most recent of which (undertaken in 2016) identifying a total of 14 buildings that fall within this category. Consideration will be given to the appropriate policy context to deliver conservation and enhancement of the historic environment, and as appropriate, this will be set out in the Local Plan at the Publication Stage (Autumn 2022)	x
HE	Page 101 references that some effects may be uncertain or unknown. We are particularly keen that any effects for	The effect of a policy approach is generally known and scored, but there are some instances where full effects can only be truly known at the detailed	x

Organisation	Comment	Response	change
	the historic environment are known and avoided/ or mitigated.	planning application stage. The Local Plan policy can specify requirements to help overcome the potential issue of unknown effects.	
HE	We welcome objective 7 as a specific objective for the historic environment and are keen to see that this is included within the SEA.	Support noted.	x
HE	In the table on page 108 we would recommend that the references relate to 'heritage assets' to meet the definition of the NPPF.	Agreed, the definition from the NPPF Glossary has replaced the former text.	✓
HE	We recommend that objective 8 also relates to historic landscapes and townscapes and these considerations are included, especially with respect to cumulative impacts.	This is already specifically covered in SA objective 7 and therefore all sites and policies will be considered with regard to their impact on historic landscapes. The scoring for SA objective 7 has been amended to ensure this is fully considered.	x
HE	Our expectation would be that where effects are identified that the SEA sets out how these could be avoided and mitigated against and that there is specific text or actions that can be included within the Local Plan, to ensure that these measures are taken at the appropriate time.	Sites or policy approaches which are deemed to have a negative impact to the SA criterion should be avoided. The Local Plan will contain a heritage policy will may set out a strategy or series of steps for applicants to ensure risks to heritage are mitigated for development proposals. In terms of mitigation, the solution may be unique to the individual proposal, therefore mitigation requirements will be specified in	x

Organisation	Comment	Response	change
		relation to individual policies or site allocations in the plan.	
HE	We would be willing to comment on any indicators that can be used to measure the success of the objectives set out in this scoping report.	Monitoring indicators will be set out in the Local Plan at Publication Stage (Autumn 2022)	x
Natural England (NE)	<p>Natural England has not reviewed the plans listed. However, we advise that the following types of plans relating to the natural environment should be considered where applicable to your plan area;</p> <ul style="list-style-type: none"> • Green infrastructure strategies • Biodiversity plans • Rights of Way Improvement Plans • Shoreline management plans • Coastal access plans • River basin management plans • AONB and National Park management plans. • Relevant landscape plans and strategies 	The Local Plan will be supported by an Open Space and Green Infrastructure Management Plan and a Landscape Character Assessment.	x
NE	<p>Evidence</p> <p>Please see Annex A for our advice on sources of local plan evidence on the natural environment.</p>	Noted.	x

Organisation	Comment	Response	change
NE	Objective 1.) Carbon dioxide is not the only greenhouse gas that contributes to climate change, some of the other main greenhouse gases are methane, nitrous oxide, fluorinated gases. We would suggest broadening the SA objective to include reducing these other greenhouses gases.	Accepted, the wording for criterion 1 has been amended to reflect the need for a reduction in greenhouse gases, and not just carbon.	✓
NE	Objective 3.) The borough contains two statutory protected RAMSAR sites; Midland Meres and Mosses Phase 1 & 2 at Betley Mere along with fiver Site of Special Scientific Interest (SSSI). The objective does not adequately cover these sites and should be reworded or a new objective should be added.	These sites are subject to protection by the Habitats Regulations and as such, every policy and site allocation will be considered as to their potential effect on these sites in the Habitats Regulation Assessment (HRA) which accompanies the Local Plan. In addition, whilst the wording of the objective does not make reference to individual sites, the scoring criteria in the Site Appraisal Framework does specifically relate to impact on designated sites and scores a site poorly if this is negative. As such we think this point is important but is adequately covered through the SA and through the HRA.	x
NE	SA Objective Indicators As set out in Planning Practice Guidance, you should be monitoring the significant environmental effects of implementing the current local plan. This should include	The natural environment metrics in the baseline information are used to provide an overview and snapshot picture of the characteristics of the Borough which help to inform the development of the SA	x

Organisation	Comment	Response	change
	<p>indicators for monitoring the effects of the plan on biodiversity (NPPF para 117).</p> <p>The natural environment metrics in the baseline information are largely driven by factors other than the plan's performance. They are thus likely to be of little value in monitoring the performance of the Plan.</p> <p>It is important that any monitoring indicators relate to the effects of the plan itself, not wider changes.</p> <p>Bespoke indicators should be chosen relating to the outcomes of development management decisions.</p> <p>Whilst it is not Natural England's role to prescribe what indicators should be adopted, the following indicators may be appropriate.</p> <p>Biodiversity:</p> <ul style="list-style-type: none"> • Number of planning approvals that generated any adverse impacts on sites of acknowledged biodiversity importance. • Percentage of major developments generating overall biodiversity enhancement. • Hectares of biodiversity habitat delivered through strategic site allocations. <p>Green infrastructure:</p>	<p>Objectives. They are not used as a mean to monitor performance of the Local Plan. A separate defined list of monitoring indicators will be published alongside draft policies and site allocations in the Publication Draft of the Local Plan (anticipated Autumn 2022). We will review your suggested indicators at that time to see if they are appropriate and applicable.</p>	

Organisation	Comment	Response	change
	<ul style="list-style-type: none"> • Percentage of the city's population having access to a natural greenspace within 400 metres of their home. • Length of greenways constructed. • Hectares of accessible open space per 1000 population. <p>Soil</p> <ul style="list-style-type: none"> • The amount of soil sealed. 		