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CPRE Staffordshire Response to Newcastle-under Lyme Borough Council Issues & Options consultation, January 2022

Local Plan statement or question	CPRE comments/response
<p>Vision</p> <p>By 2040, the Borough will have delivered sustainable new homes and jobs meeting local needs and providing more opportunities for people. We will have respected and improved the character and distinctiveness of our Staffordshire market towns, villages and rural areas with a particular focus on broadening our network of Neighbourhood Plans.</p> <p>We will have enabled new infrastructure, supported the growth of businesses and our University, whilst preserving and enhancing our natural and built assets and taken action to tackle the impacts of climate change.</p>	<p>We consider the Vision to be rather disappointing. It is too limited and insular, and lacks imagination.</p>
<p>4 Strategic Objectives</p> <p>SO-I: Create development with a sense of place and character, which naturally enhance human health through utilising sustainable construction methods and sustainable transport connections, where possible.</p>	<p>We do not consider the wording “where possible” appropriate. It should be stronger, for example “unless demonstrably impossible”.</p>
<p>SO-II: Diversify our employment base and deliver employment sites which will benefit economic growth for the region focusing on sectors: advanced manufacturing, distribution and logistics, high-tech/medi-tech and the green economy to generate more skilled jobs for local people.</p>	<p>We are unsure whether distribution and logistics will generate the desired growth in skilled jobs.</p>
<p>SO-III: Invest in the regeneration and re-</p>	<p>This is a weak statement that is too open to</p>



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<p>imagination of the distinctive Staffordshire Market towns of Newcastle-under-Lyme and Kidsgrove to promote attractive public spaces, improvement and enhancement of the streetscape, independent stores, great restaurants, bars and cafes, a higher mix of residential and more alternative uses which draw in visitors and create a vibrant high street.</p> <p>SO-IV: Mitigate the impact of climate change in the Borough ensuring local policies promote sustainability and harness opportunities for renewable energy generation, carbon sequestration and greener construction, where this is viable and deliverable.</p>	<p>subjective interpretation. It would better to say “unless demonstrably non-viable and undeliverable”.</p>
<p>SO-V: Provide a mix of housing types which are attractive to people that want to live and work in the Borough providing aspirational housing which is well designed and adaptable.</p>	<p>We are unsure what is meant by ‘aspirational’ housing.</p> <p>Aspirational is defined as “showing that you want to have more money and a higher social position than you now have”. https://dictionary.cambridge.org/dictionary/english/aspirational. We do not think that this is an appropriate word for describing housing. Instead, the emphasis should be on providing high-quality homes that are affordable, attractive and help create a beautiful environment, with a mixture of tenures. This is what the current Government wishes to achieve. (See, for example, Pillar 2 of the Planning Reform White Paper. (Some reference is made to this later in the document, e.g. from Paragraph 15.3 to 15.9).</p> <p>There should be objectives relating to the improvement of the existing housing stock that does not even meet existing standards, e.g. on heating and insulation.</p> <p>There is also nothing on the environmental improvement of run-down housing.</p>



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<p>SO-VI: Support the vitality of our rural villages, preserving and enhancing the special character which is valuable to each community whilst enabling balanced growth to improve affordability and provide choice in housing types for local people.</p>	<p>It is not clear what is meant by 'enabling balanced growth'.</p> <p>This implies the promotion of new housing in every community regardless of sustainability or other factors. (We note that it is acknowledged later in the document that this is not intended).</p>
<p>SO-VII: Raise the profile of Kidsgrove railway station and improve the connectivity to Kidsgrove town centre as a significant sustainable transport hub in the Borough.</p> <p>SO-VIII: Provide a clear local strategic planning framework to support the development of Neighbourhood Plans which will set out the more detailed policies to guide development in the Borough.</p>	<p>A Local Plan should do more than providing a strategic planning framework – see the NPPE for details of what is required.</p>
<p>SO-IX: Maintain the vast majority of the wide variety of open spaces in urban areas and improve green corridor linkages as one of the Borough's greatest unique assets and to help enhance health and wellbeing.</p>	<p>We question to the reference to the "vast majority". This implies that a number of the open spaces will not be maintained - without reference to justification, evidence or criteria.</p>
<p>SO-X: Enable the growth of Keele University to support their vision for increasing student numbers and expanding their capacity for research and development, supporting its role as a centre for innovation and as an economic asset for North Staffordshire, whilst preserving and enhancing the character of the surrounding area.</p>	<p>There seems to be an inherent conflict here.</p>
<p>SO-XI: Deliver targeted development seeking a balance between growth and</p>	<p>There seems to be no relationship considered between Newcastle and adjacent</p>



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conservation to ensure that the Borough retains its identity as both an urban and rural Borough which provides the ideal setting for people wanting to enjoy countryside, village and town life in the West Midlands.	areas, particularly in the Potteries, despite the legislative 'Duty to Co-operate'. (Although this is acknowledged later in the document).
SO-XII: Protect the Green Belt, except where exceptional circumstances justify strategic Green Belt release to meet identified needs.	<p>This is not in accordance with the NPPF. There is no reference to priority being given to brownfield sites first. Furthermore, there is no mention in any of the Objectives of encouraging the re-use of derelict, unused and redundant sites.</p> <p>Overall, we consider the Strategic Objectives to be bland, inadequate, and not in accordance with current Government policy and thinking.</p>



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Question 4

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

We consider that the New Standard Method is most appropriate for the provision of housing. The target of more than 350 dwellings per annum is challenging but achievable.

We note that this would represent almost a 50% increase in completions compared to recent rates. Para 5.6 states:

Taking the average a total of 238 houses have been built each year since 2013.

We agree with your assessment that:

This scenario most closely aligns with past delivery of housing and therefore it is likely to be the most easily deliverable option.

Will minimise the amount of new land required to meet development need, helping to protect Green Belt land.

We see no justification for the view that:
A continuation of past demographic trends in this area (Stoke and Newcastle-under-Lyme) would be unlikely to provide the labour force necessary to support a reasonable level of future job growth.

CPRE's policy position is that local authorities in areas constrained by Green Belt should not set planning targets for levels of growth beyond that which can be accommodated without harm to the Green Belt.

Question 8

Which option/s for expansion do you support?

We welcome what the Council says in Paragraph 8.8:

8.8 The Borough Council wants to protect



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Question 9

Which option/s for expansion do you disagree with?

Question 10

Are there any alternative options which require consideration?

the Green Belt, and in line with national guidance will examine fully all other reasonable options for meeting its identified need for development. The Council will produce a Local Plan strategy which:

- *makes as much use as possible of suitable brownfield sites and underutilised land;*
- *optimises the density of development including promoting a significant uplift in minimum density standards in town centres and other locations well served by public transport; and*
- *will be informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through statements of common ground.*

We consider that you should look closely at the available brownfield sites and take account of historic and future likely windfall rates before deciding on the amount of greenfield land to be allocated for development.

Suitable brownfield sites should be comprehensively identified and prioritised for development, before undeveloped Green Belt land.

On the whole, we think it more desirable to allocate several smaller sites rather than a single large site/strategic location.

CPRE would want any urban extensions to have medium or high densities, and be well linked to public transport and other social infrastructure so that car use can be minimised. There should also be a significant contribution to meeting social housing need in the local area.



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<p>Question 11</p> <p>Should development in the rural area be spread equally across the Rural Centres? If not, how should growth be distributed in the rural area?</p>	<p>We suggest that it would be appropriate to first decide the level of development anticipated in the rural areas before deciding on the distribution of development.</p> <p>We strongly advise not following the example of Stafford Borough, which did not allocate sites and ended up with a lack of control and major overdevelopment in a number of settlements and as a result substantially exceeded its 20-year allocation in just 8 years.</p>
<p>Question 14</p> <p>Should the Local Plan set an alternative target for affordable housing to the national minimum (10%), and how is this justified?</p> <p>Question 15</p> <p>Do you agree with the general ratio of 5% social rented, 2.5% first homes and 2.5% flexibility to make up the composition of affordable homes on qualifying sites?</p>	<p>We are surprised that you consider the need for affordable housing in Newcastle Borough to be only 10% of the total and believe that you should fundamentally re-consider this assessment.</p>
<p>Question 16</p> <p>How should the Local Plan help to deliver accommodation for older and disabled people and the specific needs of other groups?</p>	<p>It should include a policy requirement that all new development must provide at least 10% of new housing must be suitable for older and disabled people - and the specific needs of other groups (in the same way as the type and tenure of affordable housing is set).</p>
<p>Question 17</p> <p>Do you think a strategic employment site</p>	<p>We have major concerns about the allocation of</p>



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<p>should be allocated in the Local Plan?</p> <p>Question 18</p> <p>Should site AB2 - Land south east of Junction 16 be considered for Green Belt release?</p>	<p>a strategic employment site in the Green Belt and particularly the AB2, which at 70ha is enormous. It would result in the loss of agricultural land and public rights of way. Unlike the site at Gailey in South Staffordshire, the site cannot even claim the advantage of providing a Strategic Rail Freight Interchange.</p> <p>A 25-ha development of commercial units for warehousing and logistics near Junction 16 of the M6 has been approved at nearby Radway Green, calling into question the need for another large-scale development at this site as well.</p>
<p>Question 19</p> <p>Should site KL15 - Land to the south and east of new development site, Keele University be considered for Green Belt release?</p>	<p>No. We have failed to find even a draft Masterplan, the site's definition or any technical assessment to justify the release of an unquantified area of Green Belt.</p> <p>There should continue to be a general presumption against development on Green Belt land.</p>
<p>Question 20</p> <p>Do you agree with the key principles of development boundaries?</p> <p>Question 21</p> <p>Do you think the development boundaries should be reviewed? If so, through the Local Plan or through Neighbourhood Plans?</p>	<p>We consider that development boundaries are essential and should definitely be determined in the Local Plan.</p>
<p>Question 25</p> <p>Is a Local Plan policy on air pollution required? If so, what should a policy on air pollution contain?</p>	<p>Yes to each. Policy should set strategy, standards, targets, and the other matters indicated in the NPPF - without this the Plan</p>



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<p>Question 26</p> <p>Is a Local Plan policy on water quality required? If so, what should a policy on water quality contain?</p> <p>Question 27</p> <p>Is a Local Plan policy on environmental quality required? If so, what should a policy on environmental quality contain?</p>	<p>may be found to be fundamentally unsound.</p>
<p>Question 28</p> <p>Do we need additional measures in the Local Plan to support national policies and guidance including the National Model Design Code on the design of development?</p>	<p>Yes.</p>