



# Newcastle-under-Lyme Local Plan Examination in Public Hearing Statement

Matter 2: Vision and Objectives, the Spatial Strategy and  
Site Selection Process

On behalf of Persimmon Homes (North West) Ltd.

[In relation to Site Ref KL21:](#)

Land to the East and West of Quarry bank Road

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# 1 INTRODUCTION

- 1.1 Asteer Planning LLP has been instructed by Persimmon Homes (North West) Ltd (“Persimmon”) to prepare this Hearing Statement in relation to the Newcastle-under-Lyme (“NUL”) Local Plan 2020-2040 Submission Draft (“Submission Plan”) and the Matters, Issues and Questions (“MIQs”) posed by the Inspector.
- 1.2 Persimmon controls land to the East and West of Quarry Bank Road in Keele (“the site”) (Site Reference KL21<sup>1</sup>) which has been promoted through the entirety of the Local Plan process. The site is wholly deliverable (being suitable, available and achievable) for residential development and could deliver significant public benefits, as demonstrated robustly by the evidence presented in duly made representations in August 2023 (at Regulation 18 Stage) and in October 2024 (at Regulation 19 Stage), which have been supported by a detailed Development Statement and Masterplan.
- 1.3 This Statement responds directly to the Inspectors MIQs at Matter 2; however, it should be read in parallel with our detailed Regulation 19 representations. Separate statements have been prepared in respect of the following matters and should be read in conjunction with this Hearing Statement:
- Matter 1b – Overarching Matters
  - Matter 3 – Green Belt
  - Matter 4 – Housing Requirement
  - Matter 5 – Housing Supply
  - Matter 6 – Allocations
- 1.4 It is our view that, to support a sound Local Plan, NUL should consider Main Modifications to the Submission Plan based on the MIQs posed by the Inspector at Matter 2, including:
1. Elevating ‘Keele Village (and University Hub)’ to a standalone position in the settlement hierarchy - reflecting its role within University’s growth corridor and its once-in-a-

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<sup>1</sup> Site Reference in the Evidence Base, including Site Selection Report and Assessments (Document ED029), SHLAA (Document ED006a) and Sustainability Appraisal (Document CD04)

generation opportunity to form a new community where housing and economic growth is fully aligned with the Borough's strategic vision and objectives.

2. Attributing a higher level of growth to the Keele Village (and University Hub) settlement that reflects its catalytic role in the growth of the Borough.
3. Allocating sites in Keele Village (and University Hub) that will deliver market and affordable homes to support the future growth of the University corridor (rather than predominantly student beds).
4. Reflecting a transparent and sound site selection process that attributes appropriate weight to constraints and the Local Plan evidence base.

## 2 VISION & OBJECTIVES AND SPATIAL STRATEGY

**Q2.1: Is the proposed spatial strategy and the distribution of development (as set out in policies PSD2 and PSD3) supported by robust and up to date evidence and otherwise soundly based? In particular:**

**a) Does it reflect the vision and objectives of the Plan?**

- 2.1 Persimmon do not consider that the proposed spatial strategy and distribution of development are soundly based or reflect the vision and objectives of the Submission Plan. Two key objectives are to:
- SO-5 (V) - Provide a mix of housing types which are attractive to people who want to live and work in the Borough; and
  - SO-10(X) - Enable the growth of Keele University to support its vision for increasing student numbers and expanding its capacity for research and development.
- 2.2 Whilst Persimmon strongly support these objectives, it does not consider that the spatial strategy and distribution of development, as it relates to the “Keele Village (with University Hub)” settlement, supports their intent. Persimmon strongly supports the identification of Keele and Keele University as a combined settlement location; however, Persimmon consider that it should be recognised commensurate to its role in the Borough, rather than sitting alongside the Borough’s “Rural Centres” in the settlement hierarchy.
- 2.3 Persimmon consider that the composition, uses and economic weight of the University, alongside Keele village, create a settlement that is geographically, economically and functionally different from other Rural Centres in the settlement hierarchy. Its identification as a Rural Centre does not reflect the need for this settlement area to provide the land and supporting residential development to meet its long-term growth trajectory as part of the expanding University and its Science Park corridor.
- 2.4 Persimmon consider that Keele and Keele University should be recognised as a location that supports the significant aspirations for growth and recognises the potential to fully link employment and housing growth in a sustainable way. Persimmon suggest that ‘Keele Village (and University Hub)’ is afforded a standalone position in the hierarchy of centres - as the “Keele and Keele University Growth Hub” – sitting above the Rural Centres and reflecting its role within University’s growth corridor and its once-in-a-generation opportunity to form a new community where housing and economic growth is fully aligned with the Borough’s vision and objectives.

**b) To what degree is the distribution of development set out in Policy PSD3 based on the settlement hierarchy in Policy PSD2?**

2.5 In the context of Persimmon's comments in relation to the "Keele Village (with University Hub)", it does not consider the distribution of development to be reflective of the potential of Keele to support the catalytic growth potential of Keele University because:

- It does not deliver a level of growth that will support the retention of skilled workers in the University Growth corridor. Ambitions in both the 'NULBC's *Strategic Economic Development Strategy*' and the 'New Deal for Newcastle-under-Lyme 2019-2023' seek to double the size of the Keele Science and Innovation Park and provide over 7,000 FTE jobs by 2040 whilst significantly raising the number of new houses built each year; and
- The 800 units attributed to Keele in Policy PSD3 are predominantly student bedspaces and accommodation that will not deliver the market or affordable homes to support the growth of the University (see response to 2.1f below).

2.6 Persimmon therefore consider there to be a significant disconnect between the economic objectives of the Plan and the spatial strategy – which is not effective, nor positively prepared.

**c) Is the focus on the larger urban settlements justified and soundly based?**

2.7 Persimmon does not object to a focus on larger settlements, such as the Strategic Centre. However, the distribution of development should reflect the future growth of the Borough, in terms of its major employment opportunities and future growth potential, which would more effectively support the potential of the University corridor by providing the market and affordable homes that will underpin a sustainable pattern of development. As set out above and later in this Hearing Statement, the Keele Village (and University Hub) settlement is fundamentally different functionally and economically from other Rural Centre's, and should be elevated in the settlement hierarchy to receive a level of growth consummate to its potential.

**d) Would the pattern of development proposed meet the needs of rural centres? How were the proportions of development proposed for each settlement arrived at?**

**e) Would it provide sufficient development within rural areas and other settlements?**

**f) Is the approach to development at Keele soundly based? Does it adequately address the needs of the University?**

- 2.8 Building on the above response to Q2.1a, Persimmon does not consider the approach to or distribution of development in Keele to be sound. It does not provide the market or affordable homes that will support the economic and jobs growth of the University corridor – nor the significant employment allocations proposed at Keele University (Site’s KL13 and KL15).

***The Distribution of Market and Affordable Housing in Keele***

- 2.9 The Site Selection and Assessments Report (2024) identifies 587 commitments and completions within the Keele Village (and University Hub) settlement, which are included as part of the emerging Local Plan’s claimed supply, leaving a ‘residual’ need for 213 units to meet the identified need of 800 units during the Plan Period<sup>2</sup>. A large proportion of the 587 commitments and completions are primarily claimed from the following two sites:

- **KL16: Pepper Street, Keele** – this site was originally granted reserved matters permission for 100 dwellings in August 2018, and has subsequently received reserved matters consent.
- **KL28: Horwood Hall, Keele University** – this campus site was granted approval for the demolition of 732 student bedspaces, and erection of 1,706 student bedspaces at Horwood Hall within the Keele University campus. The Council’s housing trajectory in the SHELAA (2024) is claiming this as 406 dwellings (from the 973 net additional bed spaces) in the housing supply / commitments.

- 2.10 The Submission Plan proposes to allocate two sites in the Keele Village (and University Hub) settlement. These both support the ambitions of the University and the University Growth Corridor, which Persimmon fully supports; however, neither offer any contribution to meeting the market or affordable housing needs that would support this growth. These include:

- **KL13: Keele Science Park Phase 3** – this site has an extant planning permission for mixed-use development. The SHELAA (2024) states that *“The site has planning approval for mixed use development for employment and academic purposes with some*

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<sup>2</sup> Document Ref ED029, p51

*student residence (Ref. 17/00934/OUT & 20/00162/REM). Site promotion includes provision of approximately 220 units of student residential accommodation in addition to employment use". The extant permission (Ref. 17/00934/OUT) confirms that the consent is for student and university staff accommodation and does not provide consent for market or affordable housing – condition 6 of that permission states "6. The occupation of the residential accommodation hereby permitted shall be limited to persons who are either students or delegates at the University or members of University staff".*

- **KL15: Land South of A525** – Policy KL15 states *"Land south of the A525 Keele is allocated for residential and employment development including 260 dwellings for student accommodation and 13 hectares of employment land".* The site will therefore also deliver no market or affordable housing.

2.11 In summary, the distribution of new allocations in Keele identifies 220 units at site KL13 and 260 units at site KL15 – both of which are student accommodation only development, as explicitly stated in the Submission Plan.

2.12 Overall, Persimmon does not consider the distribution of development or spatial strategy approach at the Keele Village (and University Hub) settlement to be sound or positively prepared. It will deliver very limited high quality market or affordable housing during the Plan Period (including no allocations), which will significantly impact on the growth of the University corridor and the ability of employment generators, such as the SIP, to attract and retain staff – due to:

- The largest source of supply of the committed sites in Keele Village (and University Hub) comprises student bedspaces at Horwood Hall (406 dwellings).
- The proposed allocated supply in the Keele and Keele University settlement being entirely student accommodation, at sites KL13 and KL15.
- The Council's Housing and Economic Needs Assessment ("HENA") and Submission Plan not factoring in student growth or accommodation needs. The HENA makes it explicitly clear that the proposed growth of the University has not been taken into account in the calculation of the Borough's Housing requirement. The 2023 HENA confirms this, stating that *"As with the earlier modelling presented in the HNA, the demographic projections introduced in this report continue to principally allow for indigenous growth amongst residents of traditional student age, meaning that a*



*significant growth in the student population could generate an additional need for housing that is not explicitly taken into account<sup>3</sup>. It is therefore likely that the student accommodation proposed will merely support a proportion of the growth needs of the University – causing a severe lack of market and affordable housing in Keele to meet the proposed housing requirement.*

- Only site KL16 (Pepper Street - 100 units) and other windfall / commitments (though it is unclear in the evidence base where or what these are) have the potential to deliver any non-student residential accommodation.

2.13 Based on the above, **Persimmon does not consider Policies PSD2 or PSD3 to be sound.** They do not reflect the importance of the University corridor set out in the Submission Plan vision and objectives, nor do they distribute an appropriate level or type of development within the Keele Village (and University Hub) to support economic growth during the Plan Period.

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<sup>3</sup> Document ED001a, pp8.34

### 3 SITE SELECTION PROCESS

#### **Q2.4: Have the sites allocated for development in the Plan been appraised and selected in comparison with possible alternatives using a robust and objective process?**

3.1 Persimmon considers there to be a lack of transparency and justification for its approach to site selection – and in particular the allocation of the Council’s site at Lyme Park (SP11). When considering the site selection process, the following documents are critical to the site selection and allocations process:

- Site Selection Report and Assessments<sup>4</sup> (2024) (underpinned by the SHELAA<sup>5</sup>);
- Green Belt Assessment<sup>6</sup> (2024); and
- Sustainability Appraisal<sup>7</sup> (2024).

3.2 SP11 is identified in the Site Selection Report as available, achievable and viable – and suitable for residential development. The summary for the site states:

*“A Green Belt site promoted for housing development. Part of the site is identified in the Open Space Strategy 2022 with three typologies. This includes Amenity Greenspace (approximately 3.1ha), Natural and Semi-Natural Greenspace (approximately 3.1ha), and Provision for Children and Teenagers (0.4ha). A Biodiversity Alert Site (Bogs Wood) and Regionally Important Geological Structure (Job's Wood Quarry) is on site. Developable area calculation takes this into account. A Biodiversity Alert Site (Redheath Plantation) adjoins the western boundary. Keele Hall Registered Park and Gardens is in very close proximity to the site to the south. The site has access to services and facilities. Estimated potential capacity calculation derived from the previous masterplan exercise as part of the Keele University Growth Corridor. Mineshaft and mature trees on site. The site has access to a range of services and facilities.”*

3.3 This assessment highlights significant site constraints and provides no clear rationale for the selection of the site, when compared to other sites. Furthermore an earlier version of

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<sup>4</sup> Document ED029

<sup>5</sup> Document ED006a

<sup>6</sup> Document ED008a-d

<sup>7</sup> Document CD04

the SHELAA (2022) considered the site and it was identified as a 'Site not in Deliverable & Developable Supply' and assessed as follows:

<b>Housing Suitability</b>	<i>Unsuitable</i>
<b>Employment Suitability</b>	<i>Unsuitable</i>
<b>Availability</b>	<i>Available</i>
<b>Achievability</b>	<i>Achievable</i>
<b>Viability</b>	<i>Viable</i>

3.4 Persimmon also consider that the Council has not been fully assessed, nor given sufficient weight to the significant site constraints that are inherent on Site SP11. Persimmon considers SP11 to have significant technical constraints that have not been fully assessed, including (see Regulation 19 Representations for detailed site assessment):

- **Highways** – the site would generate significant levels of traffic on the local highway network, with limited scope for mitigation at the junctions in the vicinity of the site.
- **Ecology and Trees** – the site has been unmanaged since 2014, and has subsequently re-vegetated; facilitating the growth of extensive areas of significant ecological value, including 23.44ha of UK BAP priority habitat deciduous woodland with Ancient Woodland indicators. The site therefore supports an abundance of flora and fauna, which provide an irreplaceable habitat. There are also several groups of trees across the site including heavily wooded areas within the site, with TPOs located along the southern boundary of the site and also along the north eastern boundary.
- **Landscape & Visual** - the site is within the Keele Ancient Redland Farmlands Landscape Character Area and identified under 3 typologies in the Open Space Strategy (2022) including Amenity Greenspace (approximately 3.1ha), Natural and Semi-Natural Greenspace (approximately 3.1ha) and Provision for Children and Teenagers (0.4ha). Part 3 of the Landscape Character Assessment Study Overall Appraisal concluded that, *"larger residential development on this site would have a major adverse effect on the SA objective to strengthen the quality of the landscape and urban townscape and deliver well designed development which respects the local character and distinctiveness."*

- **Ground Conditions** - the Council's Green Belt Assessment considers the potential following on site SP11: *"Historic mining activities. Consultation with Coal Authority likely"*.

3.5 The submitted Sustainability Appraisal ("SA") sought to assess reasonable alternatives to inform the proposed site allocations, but does not make it clear why site SP11 was selected. When comparing Site KL21 and Site SP11 a summary of the assessment of impacts for these sites is illustrated below<sup>8</sup>:

Site ref	SA stage	SA1 Climate Change	SA2 Air	SA3 Biodiversity, Flora & Fauna	SA4 Natural Resources & Waste	SA5 Flooding	SA6 Water	SA7 Cultural Heritage	SA8 Landscape	SA9 Health & Wellbeing	SA10 Equality	SA11 Transport & Accessibility	SA12 Economy
KL21	R18	+	-	-	--	-	+/-	-	--	-	++	-	++
SP11	R18	+	-	--	-	-	+/-	-	--	-	+	-	-
SP11(1)	R19	+	-	-	-	-	+/-	-	--	-	++	-	+/-
SP11(2)	R19	+	-	--	-	-	+/-	-	--	-	++	-	+/-
SP11(3)	R19	+	0	-	-	-	+/-	-	--	-	++	-	+/-
SP11(4)	R19	+	0	-	-	+	+/-	-	--	--	++	-	+/-

- 3.6 The above assessment illustrates that Site SP11 will create a 'major negative' impact on biodiversity and health and wellbeing – whereas Site KL21 will have a 'major positive' impact on the economy, in line with our comments on the catalytic potential of the Keele Village (and University Hub) settlement and the University corridor.
- 3.7 The SA then goes on to list the selected and rejected sites, as set out in the table below<sup>9</sup>. It is unclear, based on the SA assessment and the impact that these sites will have, why Site SP11 has been selected and Site KL21 has been rejected. There is limited justification or explanation as to why a site that has significant adverse impacts has been selected. As such, we do not consider the SA, the site selection process or the draft allocations are sound or positively prepared in relation to these sites.

<sup>8</sup> SA (2024), p.N38

<sup>9</sup> SA (2024), p.117

Site reference	Assessed in R18 or R19 SA?	Site area (ha)	Cluster (ward)	Address	Proposed site use	Selected/rejected?	Outline reason for selection / rejection provided by NuLBC
KL21	R18	23.86	Keele	Land South of A525 and either side of Quarry Bank Rd, Keele	Mixed use	Rejected	The site is not currently a preferred site. The site makes a moderate contribution to Green Belt purposes. Topography - land slopes upwards from Station Road and the A525. Impact on townscape of Keele Village conservation area & setting of Grade II* listed building (St John the Baptist Church). Surface water flood risk (1 in 30 years).
SP11	R18	75.74	Silverdale	Former Keele Municipal Golf Course	Housing	Selected (in separate parcels)	The site is currently a preferred site in the Local Plan as through the development of the four identified parcels referred to immediately below - SP11(1), SP11(2), SP11(3), SP11(4) – it can make a contribution to the overall development requirements in the borough, subject to the creation of a suitable boundary with the Green Belt.
SP11 (1)	R19	7.22	Silverdale	Former Keele Municipal Golf Course	Mixed-use (Housing and local centre)	Selected	The site is currently a preferred site in the Local Plan as it can make a contribution to the overall development requirements in the borough subject to the creation of a suitable boundary with the Green Belt.
SP11 (2)	R19	9.83	Silverdale	Former Keele Municipal Golf Course	Housing	Selected	The site is currently a preferred site in the Local Plan as it can make a contribution to the overall development requirements in the borough subject to the creation of a suitable boundary with the Green Belt.
SP11 (3)	R19	5.08	Silverdale	Former Keele Municipal Golf Course	Housing	Selected	The site is currently a preferred site in the Local Plan as it can make a contribution to the overall development requirements in the borough subject to the creation of a suitable boundary with the Green Belt.
SP11 (4)	R19	3.40	Silverdale	Former Keele Municipal Golf Course	Housing	Selected	The site is currently a preferred site in the Local Plan as it can make a contribution to the overall development requirements in the borough subject to the creation of a suitable boundary with the Green Belt.

## Summary

3.8 Persimmon consider that the site selection process for Site SP11 is not sound, and the Council's assessment of the site and lacks transparency or rigour. Our assessment highlights that:

- There is no clear rationale for the selection of Site SP11, and no justification to support its selection in the evidence base.
- The Council's Green Belt Assessment is fundamentally flawed (see response to Matter 3).
- The site has significant technical and environmental constraints that have not been fully considered by the Council.

3.9 Overall, it is unclear how or why the site has ultimately been selected by the Council based on the SHELAA, Site Selection Report or Sustainability Appraisal – and therefore the site selection process is unsound.