

# Submission to Inspector from Keele Parish Council

## KPC comments

### ***Issue 2 – Are the provisions of the Plan in relation to the Spatial Strategy justified and consistent with national policy?***

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

- We support the University's aspirations for growth and agree that it plays a critical role in the ongoing development of the Borough. We would draw your attention to the need for such aspirations to be realistic. HESA figures show no appreciable growth in the number over students attending over the past decade. We remain sceptical that, in the current economic and political circumstances, such growth will occur. We would also note the financial issues for Keele in developing KL13 and 14.
- We are also concerned that the proposal for a link road between the A53 and A525 is too vague. It is not based on robust and credible evidence. No details are given regarding the route and we assume that it would traverse the estate of the University, going from TB19 to the A525. Details are needed regarding what vehicles would be allowed to use this road. Were it to be open to all traffic, this would create a 'rat run' through the University's estate. Have they given permission for this? If this is the intention and the university were to agree, this would place a significant additional load on the busy University roundabout onto the A525. It would also undermine the sustainability credentials of the University and contradict policy SE1, particularly with regard to air quality. We strongly urge that further detail be provided about this proposal and that access be restricted to sustainable transport (foot, cycle, buses) and potentially, University employees.

*2.2 What is the evidential basis for the settlement hierarchy in policy PSD2? Does this accurately reflect the pattern of settlements across the district? Is this up to date? How does this inform the development strategy? What other factors influenced the strategy, such as physical and environmental constraints?*

The plan notes:

*5.14 The Council has sought to direct the greatest level of development to the higher tiers of the settlement hierarchy. These have the highest levels of service provision and*

*infrastructure, as well as the best sustainable transport opportunities in the Borough. Rural centres will take a smaller share of the overall levels of growth, to support the viability of services and facilities and the vitality of these centres.*

However, Keele and Silverdale are taking a very high level of housing with 1100 homes being planned on the major sites (above). If TB19 is included, the number rises to 1650 homes. As previously noted, the settlement hierarchy notes Keele as a rural centre and omits Silverdale altogether. Thus, housing allocations contradict PSD2 and appear opportunistic rather than planned.

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

We have some concerns that this process was robust and objective. We noted in our comments on the draft in relation to AB2:

We are concerned that this proposal is weak in the following areas. The development of this strategic employment site is neither based on robust and credible evidence nor is it the most appropriate strategy when compared with alternatives. This site is in Greenbelt and requires that exceptional need be demonstrated for its release.

The Turley report does not clearly evidence a lack of land for such development but merely suggests it may be the case. Employment in logistics is relatively low paid and the need for physical labour in this sector is being greatly reduced by robotics. The vision of the area as an ever-growing logistics hub lacks vision and will not create a high skilled, prosperous future for the Borough. Increasingly, green field sites outside of urban areas is favoured for the development of such sites. The release of this site impacts significantly on the protection offered by the green belt to communities such as Talke and Audley.

We also believe this applies to the selection of sites SP11, SP23 and TB19 for housing development. This is especially pertinent to SP11 and 23 which involve removal of land from the Green Belt.

We do not judge the appraisal and selection process to have been sufficiently robust to demonstrate the need for the proposed changes in the Greenbelt in relation to SP11, SP23 and AB2.