



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

Matter 3: Green Belt

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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May 2025

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Version FINAL

Date: 30th April 2025

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 KL21¹) 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 3; 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 2 – Spatial Strategy and Site Selection
 - 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 revisit its evidence base in relation to the Green Belt, based on the MIQs posed by the Inspector at Matter 3, including:
1. Reviewing its Green Belt Assessment, which is fundamentally flawed and unsound in its assessment of site’s KL21 and SP11.

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

2. Considering the identification of safeguarded land to future-proof the emerging Local Plan and meet longer-term development needs, particularly in light of the NPPF changes and the policy landscape that has been implemented by the new Government.
3. Considering the implications of NPPF2024, particularly in robustly planning for an increased housing requirement throughout the Plan Period and in adopting new guidance on Green Belt review and Grey Belt.
4. Reviewing the assessment of Site KL21, which should, based on recent guidance, be considered as Grey Belt land.

2 PRINCIPLE OF GREEN BELT RELEASE

Q3.3: Are there exceptional circumstances to alter the Green Belt in the Borough in principle? If so what are they? If not, how do you consider housing and employment needs could be met?

- 2.1 Persimmon strongly supports the Council's Paper which sets out the Exceptional Circumstances for Green Belt Release² (2023), which considered that there is a strategic case for release based on housing/employment needs, a lack of urban capacity and the need to promote sustainable patterns of development. Persimmon consider that the need to amend the Green Belt is fully evidenced and that the site specific circumstances for release, including Green Belt impact should be a significant consideration in site selection.
- 2.2 Site KL21 is uniquely located to meet the needs of the Borough, within Newcastle's corridor of western expansion and within a settlement that includes Keele University. We consider that KL21 can demonstrate the exceptional circumstances that exist at a site specific level, which should be considered alongside the strategic circumstances that support Green belt release, including:
- **Meeting the needs of the University Growth Corridor and delivering sustainable patterns of development** – spatially, the site is in a unique location to support the exceptional growth potential of Keele University and its Science Innovation Park.
 - **New community infrastructure** – the site has the scale and potential to support Local Plan growth through both an extension to St John's CE Primary School (or other community infrastructure) and a new convenience retail offer that will support new residents and the existing village of Keele (which does not currently have provision). The site also has the scope to deliver other benefits where a need is established, such as an active travel hub to support Keele University.
 - **Defensible boundaries and lack of contribution to the purposes of the Green Belt** – the site is self-contained and would provide defensible and permanent boundaries to the wider Green Belt and, as set out later in this statement, we consider the site should be considered 'Grey Belt'.

² Document ED008c

3 GREEN BELT REVIEW

Q3.4: The Council has produced a Green Belt Assessment (ED8, 8a, 8b, 8c). Is the Council's approach to assessing Green Belt appropriate? What are your reasons for this view?

Q3.5 Has the Green Belt Assessment adequately assessed the suitability of individual sites and their contribution towards the purposes of including land in the Green Belt? Are there any omissions in the policy?

- 3.1 Firstly, Persimmon fully supports the position of the Submission Plan in establishing an inset boundary at Keele Village. Seddon Homes' Hawthorns development has demonstrably changed the character of the village to one whereby the presence of a washed over green belt would only serve to unnecessarily restrict and hinder future development. Establishing an Inset boundary allows for more agile planning decisions to be made, to the benefit of the Village as part of the wider settlement hub that is combined with Keele University.
- 3.2 However, Persimmon consider the assessment of sites in the Green Belt, as part of its Green Belt Assessment³ ("GBA") to be fundamentally flawed in its assessment of sites KL21 and SP11.

Site KL21

- 3.3 The Council's GBA states that it assessed this site as KL21 (in December 2020) and KL21a (in July 2024)⁴; however the conclusions for KL21 and KL21a are identical and state the following in the site proforma's [**emphasis added**]:

"The site is not considered to be suitable as it does not promote sustainable growth. The site is completely detached from the Keele University inset settlement which is approximately 200m away and from the Newcastle-under-Lyme urban area which is approximately 610m away. The site is adjacent to the washed over village of Keele. The site is available as it was promoted by the owner and it is not in active use and could be developed now. The site is considered to be achievable as it is broadly viable and there are no known abnormal development costs. The site has existing durable

³ Document ED008

⁴ GBA (ED008), p34

boundaries with the open countryside. Conclusion: Recommend Exclude from Process⁵.

- 3.4 Keele Village (and University Hub) is now proposed to be a combined inset settlement in the Submission Plan (with the village of Keele no longer washed over by Green Belt – supported by the Council’s Green Belt Village Study⁶). Therefore this assessment is fundamentally flawed and clearly considers the site in the context of Keele remaining as a washed over Green Belt village. To be sound, this must be revisited by the Council to reassess the Green Belt impacts of site KL21a in this context. This issue has been raised in Persimmon’s Regulation 18 and 19 representations in relation to the Part 2 and Part 3 GBA for site KL21. It is therefore considered that the GBA in relation to Site KL21 is not positively prepared, nor sound.
- 3.5 A Development Statement, submitted alongside Persimmon’s Regulation 19 representations, provides an assessment of the purposes of the Green Belt in the context of Keele becoming an inset village. It concludes that the release of the site will create a logical, defensible and long term Green Belt boundary for a logically extended Keele Village (and University Hub), which does not have an adverse impact on the openness of the surrounding countryside and which is not required to meet the purposes of the Green Belt, as defined by the NPPF.

Site SP11

- 3.6 Persimmon consider that the assessment of site SP11 in the Council’s GBA is flawed. The site has been assessed (using various boundaries) as SP11, SP11a and SP11b – all with the same conclusion:

“The site makes a moderate contribution to Green Belt purposes. Development would not result in neighbouring towns merging and it would not impact upon the setting or character of the historic town of Newcastle-under-Lyme. Development would entail an incursion into undeveloped countryside however development would not represent unrestricted sprawl as it would be reasonably contained and well defined along the strong permanent southern boundary of the A525 Keele Road. Overall, the removal of the site from the Green Belt will not harm the overall function and integrity of the Green Belt. A new recognisable and permanent Green Belt boundary would be created

⁵ Green Belt Assessment Part 4 (2024) – Assessment KL21A (pg.F.82)

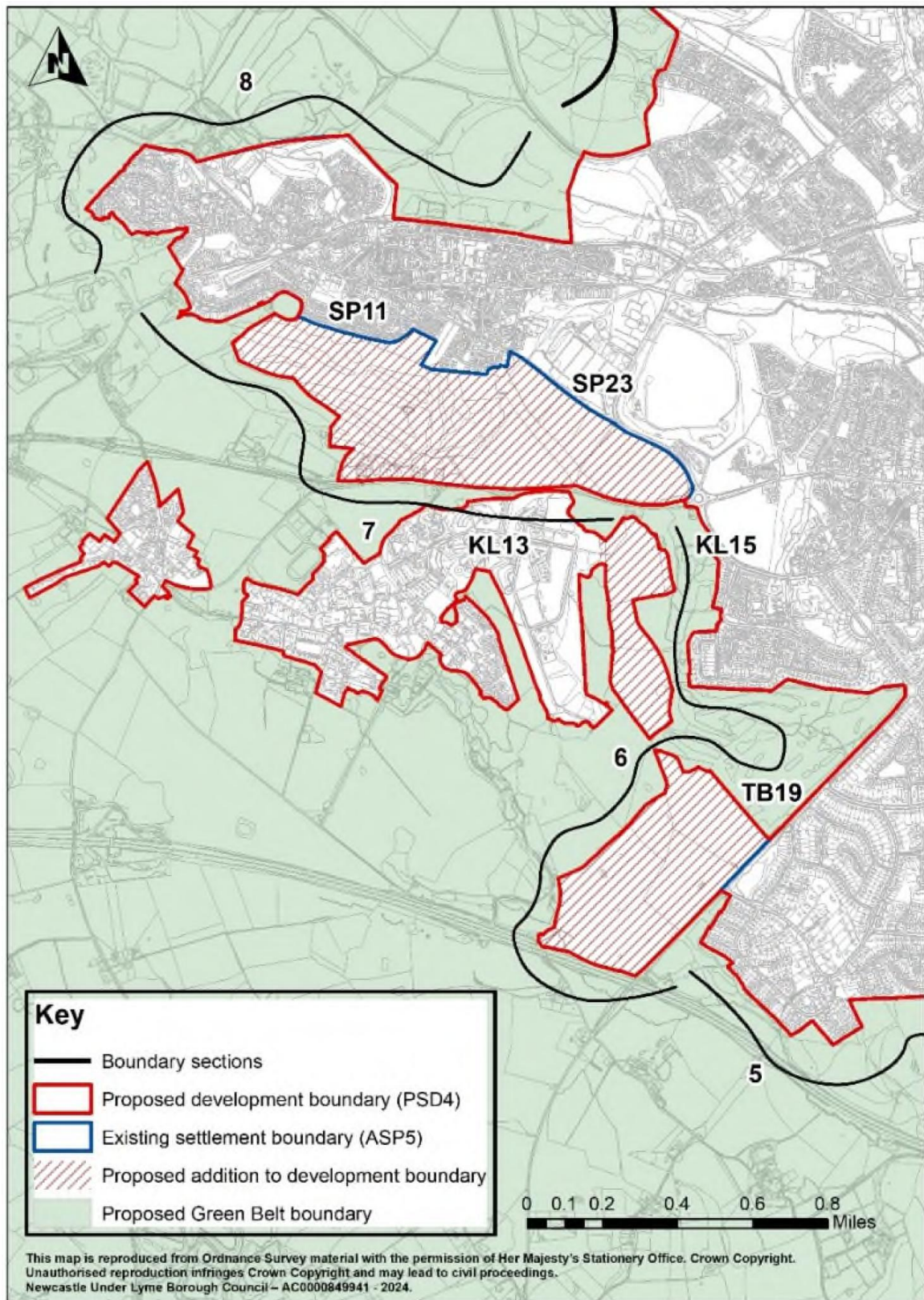
⁶ Document ED009

consisting of the A525 Keele Road to the south, a small section of Redheath Plantation and dense wooded areas to the west, and through strengthening the remainder of the western boundary. It is recommended that if the site is taken forward the accompanying policy should recognise this.⁷

- 3.7 Persimmon considers that this assessment is fundamentally flawed in its conclusions. The allocation and development of the site would effectively merge together Silverdale (which forms part of the Strategic Centre) with the new inset settlement at Keele Village (and University Hub), and have a significant impact on Purposes a) and b) of the Green Belt.
- 3.8 The impact of this merger of settlements is clearly shown in the Settlement Boundary Review Paper (July 2024), as shown in Figure 1 below, which highlights how the strategic gap between Silverdale and Keele Village (and University Hub) will be completely eradicated:

⁷ GBA (ED008b), p.F-169

Figure 1 – NUL Settlement Boundary Review – July 2024 (p.36)



Q3.8: Is the Council's decision to not include safeguarded land soundly based?

- 3.9 As part of the evidence base, ARUP has prepared a Green Belt Safeguarded Land Advice (Assessing the Need for Safeguarded Land) Report (July 2024)⁸. This assessment identifies a need for safeguarded land to retain flexibility in the Borough's supply without needing to further alter the Green Belt and to look beyond the Plan Period. The report considers the requirement and potential quantum of safeguarded land that NUL should consider in its emerging Local Plan, concluding that it is *"recommended that safeguarded land sufficient to accommodate between 1,562 and 2,342 dwellings is identified"*.
- 3.10 The Submission Plan remains silent on addressing this advice or in identifying any safeguarded sites. Persimmon would urge the Inspector and the Council to consider this advice and, as an absolute minimum, identify safeguarded land that retains flexibility to:
- Meet housing needs throughout the entirety of Plan Period, particularly in the context of planning reform and proposals to significantly increase the Borough's housing requirement.
 - Address any under delivery in the Borough's strategic allocations, particularly its large scale or brownfield land allocations.
 - Respond to macro-economic change, employment growth and other patterns that may affect demographic change or a change in need.
- 3.11 Persimmon fully supports the need to safeguard land to future-proof the emerging Local Plan and meet longer-term development needs. Safeguarding land will mean the Council has increased agility when responding to future demand, particularly in light of the NPPF changes and policy landscape that has been implemented by the new Government. This is especially critical in the University corridor where there is significant evidence that development in this corridor could lead to accelerated growth.

⁸ Document ED008d

4 IMPLICATIONS OF THE NPPF (2024)

Q3.9: How relevant to this Examination are the provisions of the NPPF2024?

- 4.1 Persimmon consider it critically important to consider the new national policy landscape – and its potential impact on housing during the next Plan Period. In relation to the NUL, the crucial changes to the NPPF, which should be fully considered by the Council, are as follows:

The Housing Requirement

- 4.2 NUL's housing requirement has risen to 550 dwellings per annum ("dpa") based on the Government's proposed changes to the Standard Method for calculating Local Housing Needs ("LHN") – this compares to:

- A 330 dpa requirement using the 2023 Standard Method for calculating LHN – representing an increase of 220 dpa or a 67% uplift; and
- A 400 dpa requirement based on the Submission Plan - representing an increase of 150 dpa or a 38% uplift – therefore falling significantly short of the 550 dpa figure in the new Standard Method for calculating LHN.

- 4.3 By any measure, this is a significant increase in NUL's future housing requirement during the proposed Plan Period, which should not be ignored in the preparation of the Borough's new Local Plan and should be considered in the context of any Green Belt review.

Housing Land Supply

- 4.4 The requirement for Council's to demonstrate that they have a Five Year Housing Land Supply ("5YHLS") has been significantly strengthened in the new NPPF. If the Local Plan is progressed and adopted based on the Submission Plan requirement (400 dpa), this will become out of date five years after the adoption of the Local Plan and the Borough's 5YHLS would be calculated based on the Government's Standard Method LHN at that time. If this is significantly higher than the adopted housing requirement (as it is currently) – this could lead to a situation where NUL will find it very difficult to demonstrate a 5YHLS early into the Plan Period (and well before the end of the Plan Period in 2040).
- 4.5 With the Plan Period running to 2040, it is critical that the emerging Local Plan considers housing need throughout the entire Plan Period, and not just the first 5 years, to ensure sufficient sites are allocated (or safeguarded) later in the Plan Period to meet its potential future needs – including land in the Green Belt / Grey Belt.

Green Belt

- 4.6 There are major changes in relation to Green Belt and 'Grey Belt' Policy in the new NPPF. The new 'Grey Belt' concept includes Previously Developed Land and any other parcels and/or areas of Green Belt land that do not make a 'strong' contribution to purposes a), b) and d) of the Green Belt (Paragraph 143), which has been supported and clarified by further National Planning Practice Guidance ("NPPG") on Green Belt Assessment (March 2025).
- 4.7 Persimmon consider these changes to be relevant to the consideration of sites and if a revisit of the GBA is required, Grey Belt sites should be considered.
- 4.8 In summary, Persimmon strongly recommend that NUL consider revisiting its housing evidence base and GBA in the context of emerging Government policy direction, to ensure that it can meet its needs throughout the Plan Period.

Q3.10: If you consider this to be the case, which sites within the Green Belt Review would be considered to be Grey Belt?

- 4.9 We would consider, based on NPPF2024 and the NPPG, that Site KL21 should be reassessed and should be considered as a Grey Belt site, based on the following assessment:

Purpose	Council GBA Assessment (2024)	Persimmon Assessment & Comments
<i>Purpose a: to check the unrestricted sprawl of large built-up areas</i>	No contribution.	No contribution: Persimmon supports the Council's assessment – the site is not adjacent to a 'large built up area' and is adjacent to Keele Village. In line with the NPPG, therefore site KL21 does not contribute to this purpose.
<i>Purpose b: to prevent neighbouring towns merging into one another</i>	Moderate contribution.	No contribution: the NPPG is clear that "this purpose relates to the merger of towns, not villages" and therefore it is not considered that the site will have any contribution to this purpose. Notwithstanding this, the site does not contribute to an essential gap between Newcastle-under-Lyme and Madeley Heath.

Purpose c: <i>safeguarding the countryside from encroachment</i>	Moderate contribution.	Weak or Moderate contribution: It is considered that the site has robust clear and durable defensible boundaries to the north, south, east and west – in the A525 (north), Station Road (south/west) and Keele Road (east). With Keele Village's new status as an inset village, the site would form a logical extension to the proposed new settlement boundary that would provide a clearly defined long term boundary that separates Keele (both physically and visually) from the countryside to the north, west and south.
Purpose 4: <i>to preserve the setting and special character of historic towns</i>	Strong Contribution.	No contribution: the Council's GBA is flawed in this assessment. Keele is not a historic town and should not be assessed as such. The NPPG clarifies the position on historic towns, which it explicitly states that "This purpose relates to towns, not villages". The GBA should therefore be revisited.
Purpose 5: <i>assist in urban regeneration</i>	Moderate contribution.	Not applicable: the Council's urban capacity study and assessment of the exceptional circumstances for Green Belt release has demonstrated that the release of Green Belt land is not preventing urban regeneration
Overall Contribution	Moderate contribution.	Weak contribution / Grey Belt: It is considered that the site makes no contribution to purposes a), b) and d) and therefore would be considered Grey Belt in the context of NPPF2024 and the NPPG.

4.10 Based on the above, we consider that should a review of the GBA be required or recommended by the Inspector, that Site KL21 should be identified as Grey Belt land; and reassessed as such.