

Submission to Inspector from Save Our Greenspace

We are a local campaigning organisation set up to protect greenspace in Keele and Silverdale. We would like the following to be taken into consideration in the examination of the Newcastle under Lyme Borough's Local Plan.

consideration of available sites elsewhere, the current greenbelt study and current housing needs assessments.

Matter 6 Housing Allocations

Policies AB12, AB33, AB15, CT1, CH13, CH14, KG6, KL13, KL15, KSE< KS11, KS17, KS18, KS19, LW53, MD29 NC13, SP2, SP11, SP22, SP23, BL8, BL18, BL32, TK6, TK10, TK17, TK27, TB6, TB19, TB23, TC7, TC19, TC20, TC22, TC40, TC50 , TC52, TC71.

Issue 6 – Are the proposed housing allocations justified, effective, developable, deliverable, in line with national policy and otherwise soundly based?

6.3 Are the sites allocated for housing sound, and in particular for each of the sites listed below:

- a) Have the site constraints been appropriately taken into account in the allocation of the site?*
- b) Are the various requirements set out in the policy clear, justified and effective?*
- c) Have the indicative yield, development mix and viability considerations been adequately addressed?*
- d) Is there robust evidence that the assumptions regarding the infrastructure required for the development are realistic and that it will be deliverable?*
- e) Is there evidence that the development of the allocation is viable and developable during the plan period?*

In relation to SP11, SP23, TB19

Excessive house building, particularly the wrong houses built in the wrong place, has a detrimental effect on neighbourhoods and healthy communities. These include, increase in traffic, congestion on existing roads, damage to the environment (issues such as drainage and air pollution), the creation of artificial, anonymous places facilitates anti-social behaviour and lack of social cohesion.

The borough plan proposes developing one thousand six hundred and fifty homes in areas surrounding Keele University. It also proposes over five hundred new dwellings be developed in and around the university campus. The plan states that new housing development will be targeted on those centres best able to support them with their

facilities. The plan fails to identify which centres are supposed to support the SP11 sites, SP23, or TB19. If the intention is that Keele will be one of these centres, we would point out that the retail facilities available are very limited but not as limited as the available parking. The failure of the plan to identify Silverdale as a centre of any sort, rather including it within urban Newcastle, prevents any recognition of the extra footfall Silverdale might receive. The plan is not properly justified, not based on robust and credible evidence nor is it effective. In the event that this plan passes inspection, and the proposed housing is built, insufficient services will exist for the new residents, or these services will be effectively inaccessible.

With thousands of new homes in a relatively small area, insufficient facilities within walking distance and the need for the new occupants to get into work, there will be huge pressure on the local road network. The plans proposals for sustainable transport options are insufficiently detailed, in truth, many thousands of extra car journeys will be made every day. Whilst understanding that transport infrastructure is not the direct responsibility of the borough, the plan should recognise existing capacity and the capacity to deliver improvements in the future. There is scant reference to current capacity nor to future deliverability in the plan. The danger of a failure in this respect will be to build the worst possible type of housing development. Development which grid locks local roads, undermines the effectiveness of local business, degrades the quality of the local environment and creates large scale anonymous estates with no heart.

The proposed access to the island developments of SP11 is impractical. Two of the proposed access points are from minor residential streets which then connect to Silverdale's narrow local roads. The other two exit onto the already crowded A525 in the vicinity of the University. These roads are already very busy in the mornings and evenings. No detailed proposals are given with regard to road improvements which might support the extra traffic from the development of SP11.

The failure of this plan to effectively vision the transport needs of the borough in the future is illustrated by the odd proposal to build a road between A53 and A525 passing through the sustainable campus of Keele University. The proposals are sketchy at best, but if it is proposed that such a road would be open to all traffic, it is highly unlikely that the university would approve its development. This is an illustration of just one aspect of this plan which is not properly justified nor effective nor deliverable.

SOGS welcomes the inclusion of a country park in the plans but are concerned that the plan offers no details of how such a park would be protected for the future were it to be withdrawn from greenbelt.

The proposal to develop facilities such as a school, retail and a health centre on the site do not consider the plan to develop the site with as four developments separated by a

Country Park nor the development of SP23. No detail is given concerning where such community facilities might be placed nor how they will be accessed by all residents from within the site without compromising the integrity of the Country Park. Neither does the plan show any consideration regarding the need for a new school in the area nor the capacity of existing schools to absorb any additional need. It is our judgement that the park as proposed would be compromised by the need to connect the SP11 and SP23 sites to the proposed community hub/school.

We do not believe that the plan for the old golf course is effective or deliverable. We judge the risk as high that any eventual development will be of a different pattern and that the country park will prove difficult to implement.

Diane Smith,

Administrator,

Save Our Green Space.

30th April 2025.