

Submission to Inspector from Keele Parish Council

KPC comments

Matter 6 Housing Allocations

Policies AB12, AB33, AB15, CT1, CH13, CH14, KG6, KL13, KL15, 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?

d) Is there robust evidence that the assumptions regarding the infrastructure required for the development are realistic and that it will be deliverable?

In relation to SP11 Lyme Park, Silverdale.

- We note that SP11(3) will be accessed via Ashbourne Drive and SP11(4) by Park Road. These are currently narrow, domestic roads lined with housing. The traffic generated by 235 and 100 homes will be significant. We urge that to support the effectiveness of these proposals, evidence be provided on the likely impact of additional traffic on these roads and on the road network of Silverdale in general.

On the same theme, that the plan proposes:

Development of the site may require junction improvements and offsite improvements secured through financial contributions.

The absence of any transport studies or further detail at this stage assumes that such improvements are possible. This is by no means clear and thus the lack of evidence makes deliverability uncertain. In short, we recommend further transport studies be included in the final submission to ensure deliverability and effectiveness.

- It is unclear which Rural or Urban centre will service the proposed housing. We have already mentioned that the failure to include Silverdale in the settlement hierarchy is an error. Silverdale is a distinct village with a proud history and many

facilities. The failure to mention it anywhere in the settlement hierarchy compromises the effectiveness of the document and undermines the proposals for this site. Two of the exit roads proposed will be into Silverdale.

In addition, it is not clear which centre will service SP11(2) and (1). Whilst it may be assumed that these homes will access services at Keele University, this is not stated. No consideration has been given to the very limited parking available at the University nor the additional traffic impact resulting from this. The failure to provide any details of road links between the two 'islands' constituting SP11(3) undermines the effectiveness of the plan.

- SP11 notes contributions required for a local health hub, schools and highway improvements. Drainage/ flood mitigation on the site is a complex issue, the coal mining risk assessment is outstanding, odour from Walley's quarry will delay development of parts of the site. Are you sure this proposal will be attractive to developers and that we will not have pleas from them that the required contributions will impact on financial viability? We remain sceptical regarding deliverability.

Whilst we welcome the inclusion of a local centre to include a local health centre, it is unclear what else constitutes local services and facilities. Is there any plan to include retailing in this local centre? We also note that no location is suggested for this centre. As the development consists of 4 'island' villages, how is it proposed that residents from all 'islands' would be able to access the local centre sited in one of the settlements when separated by a Country Park? We note the proposal for an internal link road between SP(3) and SP11(2) and SP11(1) but no proposed route is shown. Such a road risks undermining the integrity of the Country Park if not properly planned. In addition, no such link is suggested between SP11(4) and SP11 (1+2). If residents would need to use existing roads to access the local centre, this would compromise the viability and localness of the proposed centre. This matter must be addressed to bolster the effectiveness and deliverability of the proposals in SP11.

An additional Primary school on site may prove to be necessary but no evidence is provided regarding existing capacity in local Primary Schools. Details need to be provided about when such a school would be provided in the long development process for the site. Were the school to be provided at the beginning of the development it would risk undermining the sustainability of existing local schools or failing to attract sufficient children to itself be sustainable. If provided towards the end of the development of new housing, then local schools may lack capacity to accommodate the children of new

residents. In order to ensure the effectiveness of the plan and its deliverability, it is critical that additional evidence be provided and referred to in the plan.

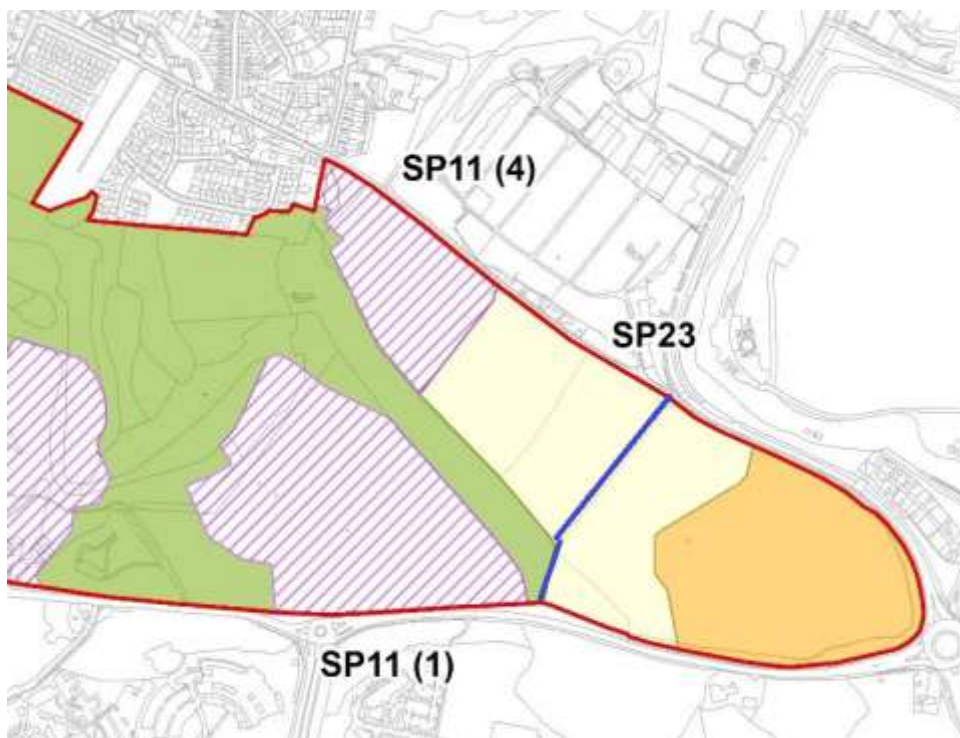
SP 23

Many of the points made above about SP11 are relevant to this site which is adjacent to SP11. For brevity, we will not reiterate them. We note proposals to link this site to SP11(4). If this is done SP23 and SP11(4) are effectively a single site.

In addition, we note that the development includes land which visually forms part of the large field visible from the Gallowstree roundabout and Cemetery Road. Whilst we welcome the protection of the terminal portion of the field, it is not clear how this land will be 'protected' from speculative development in the future.

We object to the proposal as it stands as it will impact on the local landscape and views.

The provided plan shows a number of field boundaries, in order to protect the iconic approach to Keele University, up the sweep of the existing field to the ridge, we urge that the protected area be expanded to include the adjacent area, up to the blue line shown on the map below:



Not to do so risks damage to a key view (ref. SE10-c) for a relatively small gain in housing.

TB19

Whilst having no objection to the housing proposal as such, we note that 550 homes add to the 800 homes on SP11, 200 on SP23 and other smaller local developments. This large number of new residents in this area will inevitably impact on local transport networks and services. We do not judge that sufficient evidence has been provided that such services and any potential improvement of them will meet need. We are all aware that this is a common issue with large scale development. This uncertainty is further exacerbated by a failure to indicate in housing proposals which urban or rural centre residents are expected to use.