

# **Silverdale Parish Council Response to the Local Plan Examination, for Newcastle under Lyme 3 April: Inspector Ann Jordan BA (Hons) MRTPI**

## **Matter 6 Housing Allocations**

**Policies SP2, SP11, SP22, SP23,**

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

**Do the sites allocated for residential development provide an appropriate range of sites in terms of their type and size (6.1)?**

**Are the requirements of Policy SA1 sound? are there any omissions from the policy? Is it consistent with national policy (6.2)?**

**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 (6.3)?**

**- SP2 - SP11- SP22- SP23**

### **Introduction**

SP2 and SP22 are mainly brownfield. SPC raised no objections in principle. Both sites have now received planning approval for development, however SPC objected to the increased intensity of development of SP22 at 60 dwellings per hectare and building to three levels on land adjacent to a Grade 2 listed church and Conservation Area.

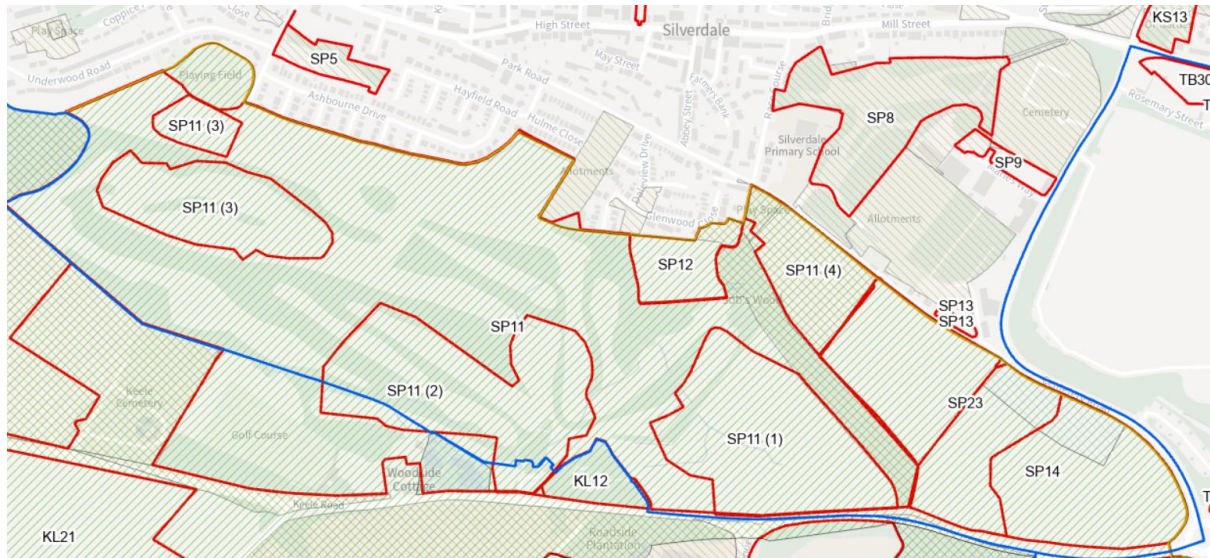
SPC objected to the 2024 Local Plan proposals by letter in October 2024. This statement develops that critique with added illustrations Figure 1 and Figure 2.

### **SP11 and SP23**

SP11, SP23 and SP14 have all been included in the portions to be released, of which 50 hectares were designated as the new country park. The resulting arrangement at the proposed new Green Belt boundary is a hybrid of open space (some protected ecologically and some included within the proposed parkland) and development sites.

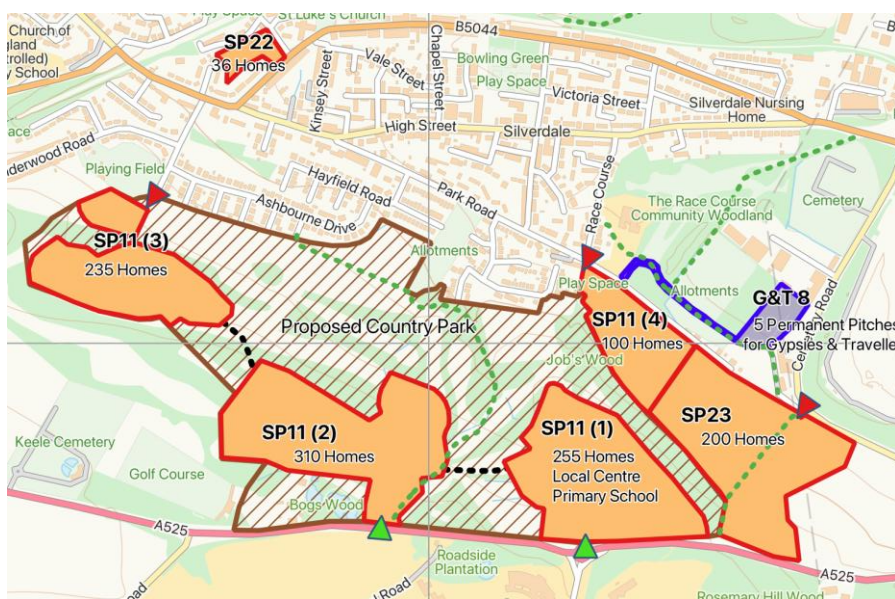
Furthermore, the disaggregation of SP11 into smaller bubbles 1-4 created considerable uncertainty over land use demarcation, road access, routes through the new estates, road improvement and infrastructure needs.

Also, SP11 straddles the parish boundaries where blue and red lines cross as illustrated in **Figure 1**.



**Figure 1:** Silverdale/Keele Parish Boundary Sites in the Green Belt: Interactive Map

Adjoining sites SP11 and SP23 are inter-related by transportation concerns yet there's no settled diagram showing future road access (from Cemetery Road for example) or indicating precise boundaries between the country park and separately, housing, community or retail land. SPC believes if the long-term future of a new country park is under consideration, then there should be boundaries created to demarcate that land to preserve and enhance the ecology within it.



**Figure 2** Location SP11 Sites 1-4 and SP23 and Access: Source Silverdale PC

Silverdale welcomed the designation of the country park (at 50 hectares). This addition would match some of the ambitions of the emerging Silverdale Neighbourhood Plan which conceptualises a central core of residential and village properties surrounded by post war suburban development but contained at the boundary by green spaces.

However, 'Proposed Country Park' (above) would be 33 hectares smaller than Silverdale Country Park's 83 hectares. The borough council states it might yet be a viable entity, possibly attractive to the Land Trust, owners of Silverdale Country Park.

There is no funding provision currently for managing the woodland and grassland spaces together with water courses. Funding applications should be pursued to ensure there is a management plan for such an extensive countryside resource.

The site promotion report (BDP 2024) outlined four neighbourhoods:

1. Keele Square SP11(1) 256 homes accessed from the existing roundabout on Keele on gently sloping land and is planned around a landscape square which will also form a local centre.
2. Keele Woods SP11(2) 315 homes based on two points of access from Keele Road, one through the former golf clubhouse and the other through the driving range.
3. Ashbourne Drive SP11(3) 233 homes in the north-west part of the site, accessed from Ashbourne Drive. This scheme also has a village green and is planned to preserve the significant bank of trees running east to west through the site.
4. Park Road SP11(4) 100 homes on Park Road. (See BDP Lyme Park p41)

It is not clear now whether the report represents just one possible configuration or a final Masterplanning exercise. SPC would request an opportunity for detailed consultations in relation to these decisions on land use.

BDP report stated for Keele Woods, SP11(2) for example

*'It may be that both [access points] are not required depending on ecology and other constraints, but it is useful to keep the two options. This neighbourhood is also based around a green space with arms of development extending along the former fairways retaining the backs of tree planting'.*

The proposed vehicular access from Silverdale to SP11 and SP23 suggests only minor improvements are required. No roundabouts. This is not a sound engineering proposition because, Silverdale's inner roads are all below A grade. B5044 is the main surface providing through routes from the east to the west at Scot Hay and to the northwest A525. An additional route through the string of developments SP11 will have knock on effects to traffic in these principal routes.

### **Modification1:**

Access to SP11(3) via Ashbourne Drive/Underwood Road and to S11 (4) via Racecourse/Park Road should be pedestrian not vehicular. This would make a considerable saving to the infrastructure costs of SP11 and eliminate congestion in Silverdale village.

## **Modification2:**

Transport infrastructure modelling to integrate SP11 with SP23 and should take account of traffic across Silverdale as well as the A525. Given the likely development gain from the disposal of an interest in the land, there should be a capital sum earmarked to ensure the Lyme Country Park is adequately funded and has a similar status to Silverdale Country Park.

Silverdale Parish Council argues that new country park must have a clearly defined boundary separated by enclosure from the four or five individual site 'bubbles' as best practice to reflect the future park management of approximately 8,000 trees and related habitat, watercourses, ponds and landscape features, quarries and hedgerows and potential activities of the public on that new parkland. It is important to restrict the incursion of future development into proposed Lyme Country Park.

The new country park designation has been re-confirmed after cabinet decisions. and leaves just 25 hectares for 900 houses plus all the infrastructure and the school, health centre and retail. The design of new facilities identified together into the bubbles shown in the BDP Consultant's report also leaves many unresolved questions about viability and accessibility.

## **Configuration of Sites SP23 and SP11**

There is unnecessary complexity at the boundaries of Keele and Silverdale parishes in the 2024 Local Plan, best illustrated in Figure 1, showing how the red development boundaries straddle the Keele/Silverdale parish border, marked blue.

## **Modification3**

Align development boundaries with parish boundaries.

The designation of SP11(4), which shares a boundary with SP23 has created an unresolved transportation problem (lack of adequate road improvements) at Cemetery Road and Keele Road. The impact of increased traffic flows through Silverdale due to the proposed estate road is a concern that needs to be addressed by the borough council.

In addition, access arrangements from Silverdale to SP11 and SP23 are in conflict. Access arrangements from Cemetery Road and Race Course for SP23 appear less clearly developed than at SP11.

The matter was exacerbated by the decision to include G&T8 site as part of the allocation. G&T8 is shown accessed from Cemetery Road and from G&T8.

Policy development explaining how highways improvement at Cemetery Road and adjoining roads to give access to SP11, SP23 and G&T8 are unlikely to solve traffic congestion problems.

## **Residential Density**

Separate spaces for new facilities as well as housing development are not disaggregated from land allocated to the country park in the Local Plan documents. 25 hectares of land must accommodate 900 houses, a single-entry primary school, a health centre and retail. St Giles Academy has been built recently in Newcastle of site area approximately 1.1 hectares that can be taken as indicative for SP11. The existing Rycroft and Silverdale health centre in Silverdale covers 0.2 hectares that can also be used as a yardstick to indicate two principle educational and health amenities in the current proposals.

The intensification of residual density on the remaining 23.7 hectares is a concern (40 dwellings per hectare), given the comments in the BDP Land Promoter Report raising variations of residential density applicable to different neighbourhoods in the development.

The BDP consultant report (2024) asserts that certain range of housing densities will prevail in the parcels at SP11 but the addition of more development mix other than residential into a smaller area entails density and site boundary considerations.

SPC would be concerned about differential housing densities (that is higher densities) applicable to sites close to Silverdale village, namely SP11(3) and SP11(4).

If the average residential density across the scheme is 40, then these two sites might be proposed at 50-60, an intensity SPC would object to on the strongest terms for the parkland location for new housing.

### **Modification4:**

The proposals should make the trade-off explicit in terms of boundaries and density between new community provision and the housing allocation at SP11 sites 1,2,3 and 4.

## **References**

BDP Consultants report (2024) Lyme Park: The Former Keele Golf Course  
(Uploaded on 27 August during 2024 Local Plan Consultation)

Newcastle under Lyme Council (2024) Local Plan Newcastle under Lyme Interactive Map (2024 Strategic Housing and Employment Availability Assessment)

<https://nulbc.maps.arcgis.com/apps/webappviewer/index.html?id=91890bdc21c04461bfe0370c8c37c0cb>

Newcastle under Lyme Council (2024) Local Plan pages 134-140 and 211 for Housing Allocations in Silverdale PC's illustration