

**TOWN AND COUNTRY PLANNING ACT
1990 (AS AMENDED)**

**Newcastle-under-Lyme Local Plan
Examination – Response to Inspector's
Matters, Issues and Questions**

MATTER 6

On Behalf of Richborough

Site:

Land South of Newcastle Golf Club (Site
Reference TB19) and Land at Cemetery
Road (Site Reference SP23)

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1. **MATTER 6 - HOUSING ALLOCATIONS**

TB19 – Land South of Newcastle Golf Club

- 1.1 Richborough do not object to the provisions of the supporting policy for this allocation.
- 1.2 The only question that Richborough raise is whether or not there is robust highway evidence to justify the provision of a full link road open to vehicular traffic between Whitmore Road and Keele University, which is a matter briefly raised in the Statement of Common Ground for TB19.
- 1.3 Richborough has had several discussions with the Borough Council and the University about facilitating a bus, pedestrian and cycle link over the course of the Local Plan preparation process. The idea behind the bus link was to connect Keele Road with Whitmore Road. Whilst neither the University nor Richborough can deliver any infrastructure across the others' land interests, the discussions have centred on each safeguarding the route of a bus link up to their respective site boundaries resulting in a ransom-free situation whereby a bus link can be delivered when necessary.
- 1.4 To date Richborough and their advisors are not aware of any specific evidence that suggests the vehicular traffic generated by TB19 must be mitigated by an all-vehicular link road, nor are they aware of any other reasonable alternative solutions that may have been considered to address any junction capacity issues, such as physical improvements to or signalisation of existing road junctions in the locality. Traffic from TB19 will be dispersed onto the existing road network via Whitmore Road to the south. Of particular concern is any attempt to associate the delivery of housing from TB19 to the delivery of a road when that road is not specifically required to mitigate TB19. Even if there was a case for the road, Richborough cannot deliver anything beyond the land they control, other than to safeguard a route through TB19 to accommodate such in the future.
- 1.5 At the time of writing, Richborough, Keele University, Newcastle-under-Lyme Borough Council and Staffordshire County Council as Highway Authority are engaged in further discussions to understand the basis for a full vehicular link in advance of the hearing sessions and a further statement can be agreed between the parties and provided to the Inspector separately from these submissions,.
- 1.6 In light of some of the uncertainty highlighted above, it is suggested that criteria 11 of Site Allocation Policy TB19 is modified to state the following:

11. The provision of a safeguarded route through the site to facilitate the future provision of a transport link between the A525 and A53.
- 1.7 For consistency, criteria 5 of allocation policy KL13 and KL15 should also be modified on the same basis.
- 1.8 Subject to resolving the above matter, Richborough consider that the opportunities and constraints of the site have been taken into account in the allocation policy, the required infrastructure is deliverable and the allocation is otherwise viable and deliverable.

SP23 – Land at Cemetery Road

- 1.9 As with TB19, Richborough consider that the opportunities and constraints of the site have been taken into account in the allocation policy, the required infrastructure is deliverable and the allocation is otherwise viable and deliverable.
- 1.10 Criteria 15 of the allocation policy states that financial contributions to highways improvements to facilitate the distribution of traffic from the A525 to Whitmore Road will be required.
- 1.11 It is not clear whether or not this is suggesting that the site is to make contributions towards the suggested link road that has been questioned under TB19 above. Criteria 15 isn't sufficiently clear as to what highway improvements will be required, nor is it set out in the supporting text to the policy, other than suggesting that junction improvements and offsite improvements "*may*" be required. It is considered that further information is required on this element of the policy.