



Newcastle-under-Lyme Local Plan Examination

Matter 11 Infrastructure – Hearing Statement

On Behalf of Keele University

Site Allocations KL13 and KL15

April 2025

nineteen47
CHARTERED TOWN PLANNERS
& URBAN DESIGNERS

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Client:

Keele University

Project:

Keele University - Site allocations KL13 and KL15

Report Title / Version:

Matter 11 Infrastructure – Hearing Statement

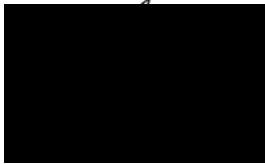
nineteen47 Reference:

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Date:

April 2025

Written by:



Clare Plant
Director

Approved by:



Clare Plant
Director

Section 1 | Introduction

- 1.1 This Representation has been prepared by nineteen47 on behalf of Keele University [“the University”] in response to the Regulation 22 Examination Hearing Sessions of the Newcastle-under-Lyme Local Plan 2020-2040.
- 1.2 This representation addresses **Matter 11 Infrastructure, Transport and Delivery** in relation to Site Allocations Reference KL13 - Keele Science Park Phase 3 and KL15 - Land South of A525 Keele.
- 1.3 KL13 is an allocation carried over from the current Local Plan. The site benefits from extant permission for development and is partially delivered.
- 1.4 This representation should be read alongside our previous **Regulation 19 written representations** submitted in September 2024, as well as the **Statement of Common Ground (SoCG – signed 26.3.25)** between Newcastle Under Lyme Borough Council and Keele University.

Section 2 | Response to Inspectors questions

Matter 11 - Infrastructure, Transport and Delivery

11.1 a) Does Policy IN1 provide an effective framework to ensure the delivery of the necessary infrastructure? In particular,

b) Are the policy's requirements supported by up-to-date evidence?

c) Have the implications of the policy in relation to viability been appropriately tested?

d) Has the Infrastructure Delivery Plan up to date and does it provide a comprehensive assessment of future infrastructure requirements based on a competent assessment of existing provision?

e) Is the policy sufficiently flexible? f) Are there any omissions from the proposed policy and supporting text?

- 2.1 **Response to 11b)** – Policy IN1 at bullet point 13(b) sets out the requirement for 'a link road between A525 Keele Road and Whitmore Road. Improvements to Talke Signals (A34 Newcastle Road / Congleton Road / Coalpit Hill)'.
- 2.2 This requirement is reflected in the policy requirements associated with specific site allocations including sites KL13 and KL15, which reference, with varied use of language, the delivery of a link road, which is to also be supported through the delivery of allocations TB19 Land South of Newcastle Golf Club and SP11 Lyme Park to the north of Keele Road. There is no indication provided of the phasing or mechanism for the provision of this link road or a definition of its status in highway terms.
- 2.3 As set out in the Statement of Common Ground between Newcastle Under Lyme Borough Council and Keele University, the University does not consider the policy requirement for a link road to be sound for the reasons summarised herein.
- 2.4 The evidence included within the Strategic Transport Assessment EDO11 is not considered to be sufficiently detailed and robust to justify the policy requirement. It is unclear whether the proposed justification is on connectivity or capacity grounds and whether alternative mitigation for perceived issues has been considered.
- 2.5 In addition to this, the provision of the link road undermines wider sustainable transport objectives within the draft plan. The University is already supporting the delivery of a rapid transport dedicated bus route to serve the campus, including KL13 and KL15 and it is considered that such measures offer more appropriate and sustainable approaches to supporting new development.
- 2.6 The sites specific policies referencing the requirement for provision of the link road fail to set out the apportionment of the link road requirement between various allocations and there is no evidence that the requirement has been tested to ensure that it will not impact the viability of the proposed allocations..
- 2.7 In respect of proposed allocation KL13, this designation is carried over from the current Local Plan (site ref E8). Saved Policy E8 of the Local Plan 2003 does not currently require the

provision of a link road to serve this development, nor has such provision been subsequently required in the determination of planning applications within this designation.

- 2.8 Furthermore, at Regulation 19 stage in the preparation of the new Local Plan, whilst Staffordshire County Council made representations regarding the need for the link road in relation to KL15, no such comments were made in respect of KL13.
- 2.9 The requirement for the link road under KL13 part 5 should therefore be deleted, as should KL15 bullet point 5, as the requirement is not justified or consistent with national policy, as required by paragraph 36 of the NPPF.
- 2.10 In order to seek common ground between participants prior to the Examination hearing sessions, Keele University, Newcastle Under Lyme Council and Staffordshire County Council are involved in ongoing discussions regarding the evidence base for the link road.
- 2.11 We therefore reserve the opportunity to make further verbal submissions during the Matter 11 hearing session, and any other relevant sessions, in order to update the Inspector on the outcome of these discussions.



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