

# Statement of Common Ground between Newcastle-under-Lyme Borough Council and Keele University

Regarding Site Allocations: Keele Science Park Phase 3/KL13 & Land South of A525 Keele/KL15

Newcastle-Under-Lyme Local Plan (2020-2040)

#### 1. Parties Involved

- Newcastle-under-Lyme Borough Council (NULBC)
- Keele University represented by nineteen47

#### 2. Introduction

 2.1 This Statement of Common Ground (SoCG) has been prepared by Newcastle-under-Lyme Borough Council (The Council) and Keele University (The Promoter) in relation to the proposed allocations and associated policies in the Local Plan. This statement identifies areas of common ground between parties in respect of the allocations of the site in the Local Plan, within the context of the existing Keele University Campus.

#### 3. Site Details

- 3.1 Site Names, Addresses & Allocations References:
  - Keele University Campus: Defined by Rural Village Boundary plus areas of Green Belt and Open Space Strategy
  - Keele Science Park Phase 3, Keele University: KL13
  - Land South of A525 Keele, Keele University: KL15
- 3.2 Gross Site Area: hectares.

KL13: 26.13haKL15: 18.05ha

- 3.3 Site Location Plan: See Figure 1 below.
- 3.4 Proposed development The Sites are allocated for residential development (specifically for the provision of student accommodation) and employment uses in the Newcastle-under-Lyme Borough Council Final Draft Local Plan 2020-2040, comprising approximately 220 units (KL13) & 260 units (KL15), plus 11 hectares (KL13) & 13 hectares (KL15) of employment land. KL13 is extant Local Plan site designation E8 for education-related academic, employment and student housing use but has been reassessed through the Local Plan and a new policy for the site drafted. This area is already partially developed.

Recently
Playing Field

Recent

Figure 1: Site Boundary Plan for KL13 & KL15

## 4. Key Policy Objective

• The emerging Local Plan provides 13no. Strategy Objectives, which outline the Local Plan's vision for the Borough. Strategic Objective 10 of the emerging Local Plan relates specifically to the University campus and states: "O-10 (X) Enable the growth of Keele University to support its vision for increasing student numbers and expanding its capacity for research and development, supporting its role as a centre for innovation and as an economic asset for North Staffordshire, whilst preserving and enhancing the character of the surrounding area."

#### 5. Site Availability and Deliverability

- 5.1 The Promoter confirms that the allocated site will be made available for development within the Plan period (2020-2040).
- 5.2 The Promoter confirms that there are no known legal or ownership impediments to development on the allocated site that would prevent delivery within the plan period.
- 5.3 The Promoter considers that the proposed development is deliverable. The Promoter will work with the Council and other relevant stakeholders to ensure that the agreed policy requirements are addressed through the delivery of the allocations.
- 5.4 The Promoter confirms that they will continue to work collaboratively with the Council, statutory consultees, and the local community to ensure that the development is delivered in a timely and efficient manner.

## 6. Delivery Trajectory

- 6.1 The Promoter has indicated in respect of anticipated trajectory for the delivery of development on the allocated site, this will be informed by University and operator demands during the plan period.
- 6.3 It is acknowledged that the delivery trajectory is indicative and may be subject to change, depending on factors such as detailed site investigations, market conditions, and the timing of planning approvals.

#### 7. Further Assessments

 7.1 It is agreed that detailed technical assessments (e.g., Transport Assessment, Flood Risk Assessment, Heritage Impact Assessment, Ecological Assessment) will be required to support any future planning application for the Site. These assessments will be carried out in accordance with relevant legislation, national policy and guidance, and best practice.

## 8. Areas of Agreement

- 8.1 The Council and the Promoter agree on the following matters:
  - The principle of developing the Sites (x2) for residential development & employment uses in accordance with the allocations (x2) in the emerging Local Plan.
  - The site boundaries (x2) as defined on Figure 1.
  - The proposed development supports the objectives of the Local Plan and other material considerations subject to detailed consideration through a planning application.
  - Proposed development will be delivered in broad accordance with the policy requirements of the Local Plan with the exception of the below areas of disagreement.
  - The Sites (x2) are available and deliverable within the Plan period.
  - The specific requirements of policies KL13 & KL15 are appropriate and justified.

## 9. Areas of Disagreement

• 9.1 The following have been identified as matters on which the parties currently disagree.

| LPA   | Agent/University                             |
|---|--|
| The Keele University Campus is defined by   | Refer to objections raised in the            |
| Rural Village Boundary plus areas of Green  | nineteen47's representation (dated           |
| Belt and Open Space Strategy                | September 2024) to the pre-submission        |
|   | consultation event.                          |
| Policy KL13 bullet point 5 requires 'The    | The allocation of site KL13 reflects a       |
| delivery of a link road and walking/cycling | designation carried over from the current    |
| link from the A53 Whitmore Road through     | Local Plan (site ref E8). Saved Policy E8 of |
| site allocation TB19 Land south of          | the Local Plan 2003 does not require the     |
| Newcastle Golf Course through to the A525   | provision of a link road to serve this       |
| Keele Road'. Site KL13 has been considered  | development, nor has such provision been     |
| on its own merits as an allocation in the   | subsequently required in the determination   |

emerging local plan against an up-to-date evidence base. This has identified the need for a link road to support the future intentions of the University. of planning applications within this designation. This bullet point should therefore be deleted from Policy KL13.

KL13 bullet point 14 require 'Financial contributions to improvements in the capacity of health facilities'. Site KL13 has been considered on its own merits as an allocation in the emerging local plan against an up-to-date evidence base. The site includes student accommodation. The emerging Local Plan is supported by an infrastructure delivery plan which has identified the need for contributions (pg 162, CD16) from the site towards health facilities.

The allocation of site KL13 reflects a designation carried over from the current Local Plan (site ref E8). Saved Policy E8 of the Local Plan 2003 does not require the provision of financial contributions to health facility capacity and this is a matter that should be determined based on robust evidence of need at the time of a planning application. No such evidence has or can be proportionately presented at this stage, and this bullet point should therefore be deleted from Policy KL13.

Policy KL15 bullet point 5 requires 'The delivery of a link road and walking/cycling link from the A53 Whitmore Road through site allocation TB19 Land south of Newcastle Golf Course through to the A525 Keele Road'. Site KL15 has been considered on its own merits as an allocation in the emerging local plan against an up-to-date evidence base. This has identified the need for a link road to support the future intentions of the University. The Strategic Transport Assessment (ED011) and Infrastructure Delivery Plan (CD16) has considered alternative modes of travel to the site and concluded that mitigation measures are required, including bus services and a link road are required to support the allocation of sites in the Local Plan, particularly on the A525 Keele Road.

The Infrastructure Delivery Plan 2024 (CD16) and the Strategic Transport Assessment 2024 (ED011) were prepared in advance of the updated NPPF (December 2024). They do not therefore take account of the 'vision-led approach' set out at paragraphs 109 and 110 of the NPPF. This indicates that growth should be accommodated through alternative modes of travel and limiting need to travel, which the wider University is well-placed to support given the campus geography and long term commitments to carbon reduction and sustainable growth targets.

The vision-led approach is supported by the currently delivery of a a rapid transport dedicated bus route being provided within the campus.

The implications of the updated NPPF also require a reassessment of the baseline assumptions of the existing evidence base. It is not considered that the provision of a new link road, without robust evidence of need can is justified.

Furthermore, there is a lack of clarity regarding the apportionment of such a requirements between KL15 and neighbouring housing allocation, particularly as the link dissects KL15 land.

This bullet point should be deleted as it is not justified or consistent with national

|   | policy, as required by paragraph 36 of the NPPF. |
|---|--|
| KL15 bullet point 14 require 'Financial   | This is a matter that should be determined       |
| contributions to improvements in the      | based on robust evidence of need at the          |
| capacity of health facilities'. The site  | time of a planning application. No such          |
| includes student accommodation. The       | evidence has or can be proportionately           |
| emerging Local Plan is supported by an    | presented at this stage to justify this          |
| infrastructure delivery plan which has    | requirement, and this bullet point should        |
| identified the need for contributions (pg | therefore be deleted from Policy KL15.           |
| 162, CD16) from the site towards health   |  |
| facilities.                               |  |

## 10. Signatures

Signed on behalf of Newcastle-under-Lyme Borough Council:



Name: Allan Clarke

Position: Planning Policy Manager

Date: 26.03.2025

Signed on behalf of Keele University:



Name: Chris Garlick

Position: Director of Estates and Campus Services

Date: 26.03.2025