



## **Newcastle-under-Lyme Local Plan Examination**

### **Response to Inspectors Post Examination Hearing Views – Site TB19 and Green Belt Boundary**

1. The Inspector in her post examination hearing views (EX/INS/06, para 33) notes that in respect of site TB19:

*“33. The allocation proposes 550 dwellings on a site of 45 hectares. In light of my comments in relation to the delivery of a link road between the A34 and the A525 set out in paragraph 12 above, the inclusion of this site within the Plan may need to be revisited. Notwithstanding this, the site promotor’s indicative site layout shows a substantial area of landscaped open space, aimed at mitigating landscape impacts and providing a buffer for motorway noise. The developable area should be reviewed to retain the extensive areas of landscaping and open space within the Green Belt”.*

2. The matter of the Link Road from the A525 and A53 has been addressed through examination document EX/NBC/40, linked to statements of common ground with Richborough (EX/SCG/11) and Keele University (EX/NBC/12).
3. Following engagement with the site promotor, a revised site boundary has been established to identify the developable area and is shown in the Illustrative Development Envelope Plan in Appendix 1 to this note.
4. It is considered that the boundary, which now runs slightly to the south of the pylons that run through the site, represents an appropriate boundary with the Green Belt and this will be further supplemented by a proposed modification to the policy wording to support the establishment of a permanent boundary to the remaining Green Belt.
5. The proposed Green Belt boundary runs slightly to the south of the pylons that run through the site to ensure no impact upon the power lines and their ongoing and safe maintenance.
6. Criteria 9 of policy TB19 is proposed to be amended, as follows:-

9. Provision of strategic open space, **in the form of a country park**, to the south-west of the site adjacent to the M6 Motorway in accordance with an agreed masterplan, noise mitigation strategy and ecological mitigation strategy. **The strategic open space should be retained in the wider Green Belt. A clearly recognisable, permanent and durable boundary with the Green Belt should be created through the planting of appropriate native species.**

7. In addition to the above, the retention of the strategic open space in the Green Belt and the wider improvements such as tree planting and new recreational footpaths created would deliver environmental quality and accessibility compensatory improvements to offset the removal of the development parcel from the Green Belt.
8. Following engagement with the site promoter, it is confirmed that the strategic open space will be brought forward as part of the wider green infrastructure strategy for the whole site.
9. In summary and in line with the Inspector's request, the developable area for site TB19 has been reviewed, and extensive areas of landscaping and open space have been retained in the Green Belt. Because of this change, improvements to the environmental quality and accessibility of the County Park are considered to represent compensatory improvements.

## **Appendix 1: Note from Site Promoter for TB19**

## **1.0 Introduction**

- 1.1 Site TB19 (Land South of Newcastle Golf Club) is being promoted through the emerging Local Plan by Richborough.
- 1.2 This note has been prepared in response to the Local Plan Inspector's 'Post Hearing Advice – Further Work and Related Matters' letter (EX/INS/06) where it is applicable to Site TB19. It is understood that the Inspector does not need any further response on certain matters such as the Whitmore Road / Keele Road link and minerals safeguarding; therefore this note only addresses those matters that are outstanding.

## **2.0 Land Retained within the Green Belt**

- 2.1 Appendix 1 (Illustrative Development Envelope Plan) attached to this note identifies the part of the site now proposed to be retained within the Green Belt. The arrangement reflects the proposed pattern of development for the site that has been promoted by Richborough over the course of the emerging Local Plan process; and continues to locate built form to the north of the overhead power lines and the country park to the south.
- 2.2 The country park will provide a mix of publicly accessible areas and biodiversity improvements. This approach would allow for the provision of physical enhancements such as additional tree planting and the creation of new recreational footpaths, which would link to the existing public rights of way system as well as eastward to Seabridge.
- 2.3 Being retained in the Green Belt means this part of the site will act as an area for the delivery of both environmental quality and accessibility compensatory improvements so as to off-set the impact of removing the remainder of the site from the Green Belt. This reflects the version of the Framework against which the Plan is being examined.
- 2.4 The country park will now stay as Green Belt land but it will not be brought forward in isolation and continues to be part of the wider green infrastructure strategy for the whole site as indicated on the Illustrative Development Envelope Plan. The holistic approach of new housing combined with significant public open space remains.

## **3.0 New Green Belt Boundary Location**

- 3.1 The location of the new Green Belt boundary is proposed just to the south of the overhead power lines. The reason for this, rather than using the pylon route itself, is that a new boundary will be created principally through new planting. The suggested boundary will avoid any impact on the power lines as that planting matures e.g. cable swing.
- 3.2 Access to the pylons and power lines will be required for maintenance. The location of the new boundary also allows the operator of the power lines easy access through the main site without needing to navigate new woodland and vegetation or any ecological

improvement areas that might form part of the new boundary. The area around the base of the pylons will need to remain clear for safe access.

3.3 It is therefore proposed that the new boundary is situated just to the south of the pylons with the boundary planting falling within the country park and the more urbanising feature of the pylons themselves located on the edge of the new development area.

3.4 It is anticipated that the TB19 policy will be amended to include reference to new planting to create a robust Green Belt boundary. As well as functioning for this purpose, the planting would become part of the green infrastructure network leading through the development area and into the country park.

## 4.0 Quantum of Development

4.1 The Illustrative Development Envelope Plan shows a developable area outside of the Green Belt of 16.125ha. Currently the draft policy refers to 550 dwellings but the eventual number of dwellings will very much depend on the housing mix.

4.2 Draft Policy HOU2 (Housing Mix and Density) seeks a net density of around 30 – 50 dph for the site. On the basis of its location and the aspirations for a mix of housetypes, a mid-point of around 40 dph would seem a suitable density. However, that may not reflect the surrounding area and two further density options have been looked at – 38 dph and 35 dph. The former is reflective of the HOU2 based mix but with a greater focus on 3 and 4 bed properties whilst the latter is more orientated to family housing.

4.3 Based on the same developable area of 16.125ha, these different densities result in:

*OPTION 1 : 40 dph*  
650 plots

*OPTION 2 : 38 dph*  
613 plots

*OPTION 3 : 35 dph*  
564 plots

4.4 The Reasoned Justification<sup>1</sup> to TB19 does allow for a minor adjustment to the overall quantum of development achieved on the site against the 550 dwellings. All options result in a higher number of dwellings than the draft policy but not significantly so for Option 3 (3% greater) and Option 2 (11% greater). Option 1 is slightly higher at 18%.

4.5 Whilst Richborough are of the opinion the allowance for a minor adjustment could mean that all three options are not incompatible with a base of 550 dwellings, the Inspector may wish to consider increasing the allocation dwelling number as part of any Main

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<sup>1</sup> Paragraph 13.253

Modifications consultation. As the developable area now proposed is in line with that which has been promoted previously, any increase in numbers would relate to housing mix flexibility rather than any increase in the developable area.

## **5.0 Development, Drainage and Flood Risk**

- 5.1** The site is entirely located within EA Flood Zone 1, classified as having a less than 1 in 1,000 year annual probability of fluvial flooding and is therefore at low risk.
- 5.2** The Surface Water (Pluvial) Flood Map provided by the Environment Agency indicates the majority of the site is at low risk of pluvial flooding with the northern and southernmost site boundary both shown as being at an increased risk from surface water flooding. However, this is considered as being consistent with the existing brook and ditch network. The EA mapping also indicates a flow route through site, which is associated with its general topography.
- 5.3** The three dwelling density options identified in Section 4 above utilise a sequential approach to design whereby developable areas and attenuation areas are kept outside of any risk extents, with flow routes accommodated within green corridors and areas of public open space. Areas of surface water risk have therefore been considered when assessing the dwelling capacity of the site and the range of 564 – 650 plots presented in Section 4.
- 5.4** The introduction of hardstanding associated with development will introduce an impermeable area, which will increase the amount of runoff generated. As infiltration has been deemed unsuitable for surface water disposal, the site will utilise an on-site attenuation system, with discharge sought to the northern existing ditch network and southern existing brook network at the greenfield runoff rate.
- 5.5** As per the principles outlined in the SuDS manual, effective management of surface water runoff entails utilising SuDS features close to source. The development will look towards the use of tree pits, bio-retention areas, conveyance swales and permeable paving; all of which will capture and discharge surface water runoff close to their source. Surface water storage is primarily going to be provided in attenuation basins.

# APPENDIX 1

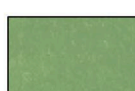
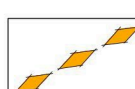
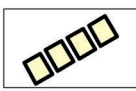
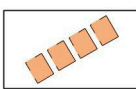
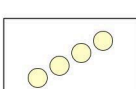
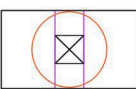
## ILLUSTRATIVE DEVELOPMENT ENVELOPE PLAN



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KEY

-  SITE BOUNDARY
-  SITE ACCESS VIA WHITMORE ROAD
-  RESIDENTIAL DEVELOPMENT
-  PUBLIC OPEN SPACE (inc suds)
-  EXISTING PUBLIC RIGHTS OF WAY
-  PROPOSED PRIMARY STREET
-  CONNECTING STREETS
-  EXISTING TREES
-  SUSTAINABLE DRAINAGE
-  SAFEGUARDED TRANSPORT LINK
-  CONTOURS (1M)
-  ELECTRIC PYLON LINE AND OFFSET
-  INDICATIVE PLAY SPACE LOCATIONS

| AREA      | 35DPH | 38DPH | 40DPH |
|-----------|-------|-------|-------|
| 16.125 HA | 564   | 613   | 650   |