

Programme Officer: Carole Crookes

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Date

Mr Allan Clarke
Planning Policy Manager
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Dear Mr Clarke

**Examination of the Newcastle Under Lyme Local Plan
Inspector's Response to Post-Hearing Comments to the Council**

Thank you for the prompt submission of additional information following the recent hearings. I have now reviewed these submissions and have comments to make regarding the proposed allocation CT1 - Land at Red Street, Chesterton.

As you will be aware from my post-hearing questions, I accept that there are exceptional circumstances to justify alteration of Green Belt boundaries by the Plan at the strategic level. These include the need to provide housing, including affordable housing in the Borough, which I am satisfied could not be appropriately provided for without the release of Green Belt land. However, exceptional circumstances also need to be demonstrated to justify detailed boundary alterations associated with individual sites.

Allocation CT1 proposes Green Belt alterations to provide around 530 houses, which the Housing Trajectory [EX NBC 51a] anticipates will be delivered from 2030. The information provided in support of the allocation includes a geo-technical survey [reproduced in EX NBC 45] which identifies that the site has been previously used for coal mining with a large number of mine entries recorded on the site. The desk-based assessment indicates that a number of potential contaminated land and land stability risks are anticipated on site but that there are effective mitigation measures available to facilitate the safe construction of residential development. On this basis the report concludes that the site is deliverable but makes no costing assumptions.

The Whole Plan Viability Assessment (WPVA) [ED04] uses a series of typologies to assess the likely viability of development within the Plan. For brownfield sites higher build costs associated with demolition or remediation are reflected in an allowance of £500,000 per hectare. For greenfield sites the WPVA assumes a lower land purchase cost than brownfield and provides for £20,000 per dwelling on larger sites to reflect “opening up” costs on greenfield sites. Any “abnormal” costs are assumed to be reflected in the sales price of the land.

However, in the case of site CT1 I am not persuaded that this typology fully reflects the characteristics of the site. There is a clear risk that development of the site would be impacted by both the “opening up” costs associated with its greenfield location, and remediation costs associated with its former use. In this regard there appears to be a considerable risk that a development scheme on site would not be viable. I take into account here both the affordable housing and infrastructure requirements set out in the Plan, and the requirements set out in National Planning Policy Guidance in relation to the “Golden Rules” to be applied to development in the Green Belt.

I am therefore of the view that based on the evidence put to me, I do not have persuasive evidence that the site can be considered developable. In this regard, I cannot be assured that the allocation of the site would lead to the provision of policy compliant housing, including affordable housing and so I cannot be assured that there are exceptional circumstances to justify the release of this site from the Green Belt at this time.

On this basis, I am minded to recommend a main modification which would see the site’s removal from the Plan. However, ahead of progressing on this basis I would welcome the Council’s view as to whether they would wish to produce a site-specific assessment for Allocation CT1 with the aim of showing how the proposed uses could be viably developed at the point envisaged. If the Council is minded to produce this additional evidence, I would welcome confirmation of this as soon as is practicable, including an estimate of when such an assessment could be provided.

Other Matters

My post-hearing letter also related to a number of other matters. I do not have any further comments or requests at this time and if necessary will be in contact in due course.

Please contact me through the Programme Officer if you would like any clarification on the above. I am not, at this stage, inviting comments from anyone else on the content of this letter.

Anne Jordan

INSPECTOR