

**BDP.**

# **LYME PARK**

## **THE FORMER KEELE GOLF COURSE**

**KEELE ROAD (A525), NEWCASTLE-UNDER-LYME, ST5 5AB**  
SITE PROMOTION REPRESENTATIONS FOR INCLUSION IN THE NEWCASTLE-UNDER-LYME LOCAL PLAN

These Representations are prepared by BDP on behalf of our client, Newcastle-under-Lyme Borough Council (the Borough Council), for consideration towards the Newcastle-under-Lyme Local Plan (2020 to 2040).

The Representations relate to the Former Keele Municipal Golf Course site (which is to be rebranded Lyme Park), which sits to the north of the A525 and Keele University and south of the settlement of Silverdale. The Local Plan, which these Representations are supportive of, proposes development for 900 dwellings on the site. These representations illustrate how 900 dwellings could be delivered across four distinct land parcels, with the remaining parcels to be retained as green space/country park.

Context

On 13 January 2021, the Borough Council resolved to undertake a new Local Plan, which will set the vision and framework for how Newcastle-under-Lyme will grow to 2040.

The Local Plan will set out targets for the number of homes and jobs to be delivered in the Borough and a spatial strategy to guide development to the most sustainable locations. The Plan will allocate sites for housing and employment to provide certainty on where growth will occur.

A couple of rounds of consultation have already occurred: The Issues and Strategic Options consultation was open between 1 November 2021 and 24 January 2022.

Following Issues and Strategic Options consultation, the Borough consulted on the First Draft Local Plan between 19 June and 14 August 2023.

The Borough Council’s next steps are to review and consider the information received during the First Draft Local Plan consultation, to inform the production of a Final Draft Local

Plan. The Borough will then consult on this Final Draft, before submitting the Plan for Examination in Public in 2024.

Purpose of these Representations

These Representations: describe the site and its context; provide an overview of the existing and emerging planning policy and the supporting evidence-based documents of relevance; and set out the justification in support of the site’s allocation within the emerging Plan.

Structure of these Representations

The remainder of these Representations adopts the following structure:

4 Chapter 2: Site Location and Context

Site description and allocation in the adopted Development Plan – the site’s background, including its location and characteristics and existing Planning Policy context;

22 Chapter 3: Proposed allocation

Overview of the site’s identification within the emerging Local Plan, together with the evidence based documents that have informed this;

36 Chapter 4: Representations / Assessment

Commentary to demonstrate how the site is available, suitable, deliverable and developable; and

52 Chapter 5: Conclusion

Summarising the key points

Revision	Comment	Prepared by	Checked by	Date
P01	// First Issue	// ND LR	// DS DR	// 10/01/2024
P02	// Updated to client comments	// ND LR	// DS DR	// 01/02/2024
P03	// Masterplan Update	// ND LR	// DS DR	// 21/02/2024
P04	// Title Change	// ND LR	// DS DR	// 22/02/2024



# SITE DESCRIPTION AND ALLOCATION

*The site's background, including its location and characteristics and existing Planning Policy context*

## CHAPTER 2

# SITE LOCATION AND CONTEXT



The site is located approximately 2 miles (3.2km) west of Newcastle-under-Lyme town centre, and 4 miles (6.4km) west of Stoke-on-Trent.

The site is located on a former golf course. Keele Municipal Golf Course was an 18 hole, 6,390 yard course, designed by Fred Hawtree in what had been part of Keele Hall Park. It was opened in 1974 but closed in 2014. It is sandwiched between the villages of Silverdale and Keele, and is adjacent to Keele University.

The site is of an irregular shape, being made up of former golf fairways and greens, defined by semi-mature/mature woodland and foliage and open green space, clubhouse, wardens' houses and hardstanding car parking area. To the centre of the site lies Springpool Spring and pond.

It sits in-between the Keele University campus to its south, and the settlement of Silverdale to its north.

It is bounded by Keele Road (the A525) to the south, open countryside to the east and west – within which Keele Driving Range and Keele Cemetery are located - and the Strategic settlement of Silverdale to the north.



Keele Golf Course in 2023



# SITE LOCATION AND CONTEXT

The only built development within the site comprises of the golf course's former club house and its associated hardstanding car park, accessed off Keele Road (A525), a disused storage building to the north-west of the former club house and an equipped playground off Park Road, towards the north-east corner of the site. The former club house comprises a part two storey with pitched roof / part single storey with flat roof structure of brick construction, and the warden houses to the west of the clubhouse of two stories with pitched roof.

The site is otherwise undeveloped, formed of the former golf course, including its fairways and bunkers and landscape tree belts in-between. The site area totals circa 69ha.



Keele Golf Course in 2023

## Public Right of Way

A Public Right of Way (PROW, reference Silverdale 20, Newcastle 112) dissects the site from north to south, linking the settlement of Silverdale, via Alton Close to the north, with the University campus, via the golf course's former club house to the south. The pink lines on the plan below illustrate a formal PROW footpath.



Source: Staffordshire County Council Rights of Way Map, under licence from Ordnance Survey (Licence Number AC0000849944).

## Flood Zone

The whole site is located in Flood Zone 1 (low probability of flooding - less than 0.1% probability), but is susceptible to some, limited surface water flooding during heavy downpours.

## Ownership

The site is owned in its entirety by the Borough Council. Keele University have an interest in a couple of parcels of the site, immediately off Keele Road (the A525): at the former gold club house; and to the north of the Keele Road (the A525) / University Avenue roundabout.



The only existing point of vehicular access into the site is from the golf course's former club house. The wider site is not accessible via vehicle.

Formal pedestrian access is provided via the aforementioned PROW (reference Silverdale 20, Newcastle 112) from Alton Close to the north and the golf course's former club house to the south.

There are very few cycle routes or pedestrian footpaths to the west of the site, but there are a number of byways open to all traffic (BOATs) in and around Keele. An application was submitted by residents in 2020 to formally confirm the route as a right of way.





The site’s sloping topography offers panoramic views to the north towards Silverdale and the country park. Landmarks visible include St Giles’ Church in Newcastle-under-Lyme, Saint Luke the Evangelist Church in Silverdale, and Silverdale Country Park on the site of the former Silverdale Colliery.

The site is surrounded by proposed Green Belt land, as outlined in the Newcastle-under-Lyme Local Plan. A number of Biodiversity Alert Sites surround the site, including Bog’s Wood, which is located within the site boundary. Silverdale Country Park to the north is a Site of Biological Importance.

The site’s topography poses logistical challenges for development, but opens opportunities for houses or apartments with excellent north-facing aspects.

As a former golf course, the site is covered with large areas of woodland and mature trees, so future development should aim to retain as many of these as possible.



Planning Policy Context – Adopted Development Plan

The Development Plan for the Borough currently comprises of a number of documents and some selected ‘saved’ policies.

These are:

- Newcastle-under-Lyme and Stoke-on-Trent Core Spatial Strategy (adopted 2009)
- ‘Saved’ Policies of the Newcastle-under-Lyme Local Plan (adopted 2003, with ‘saved’ policies established in 2011)
- Minerals Local Plan for Staffordshire (2015 - 2030), produced by Staffordshire County Council
- Staffordshire and Stoke-on-Trent waste Local Plan (2010 - 2026), produced by Staffordshire County Council
- A number of Made Neighbourhood Plans.

The site is identified on the Local Development Framework Proposals Map (2006 – 2026) as falling within the designated Green Belt, within an Area of Landscape Maintenance.





# 12 LYME FOREST

In 2020, the Borough Council adopted a sustainable environment strategy and in doing so, made a commitment to ensure a sustainable future for Newcastle-under-Lyme that leads to improvements within communities and a reduction of the Borough's own impact on the environment.

A major theme of the strategy is the natural environment, both in terms of habitat protection and nature recovery, but also increasing the local tree canopy and locking up carbon through creating new carbon capture woodlands, parks and greenspaces.

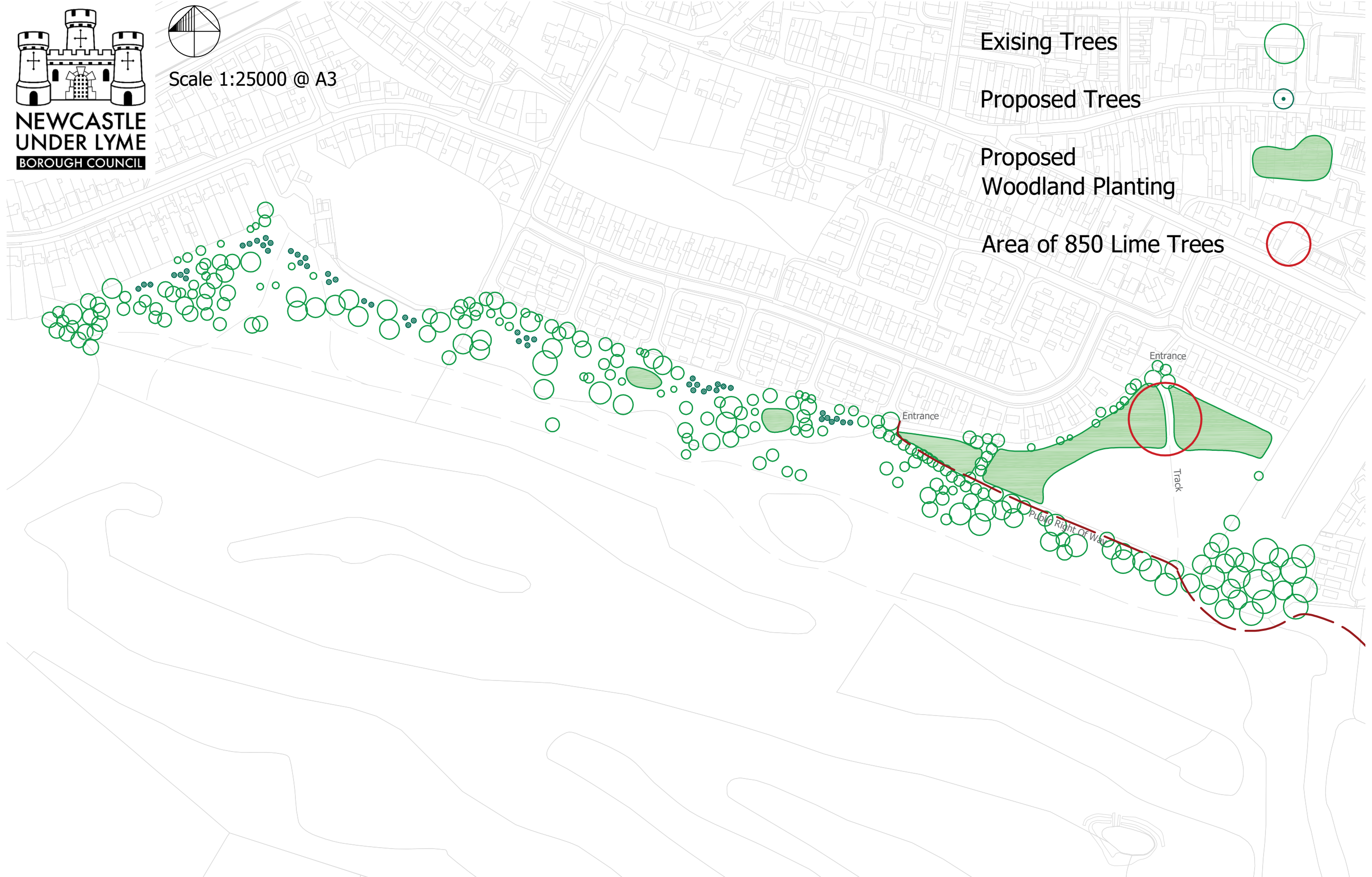
The Borough's Urban Tree Planting Strategy was subsequently adopted on 7 July 2021 and outlines the Borough's intentions regarding proposed tree planting in the urban wards of the borough to support the objectives of the sustainable environment strategy.

As part of the implementation of the latest phase of the urban tree planting strategy and to celebrate the 850th anniversary of the borough's Royal Charter in 2023, a commemorative Lyme Forest was created during the February / March 2023 winter planting season on the northern boundary of the former Keele Golf Course site.

This new Lyme Forest consists of 850 lime trees of varying species and is complemented with a range of other native broadleaf trees on the site.

This is in recognition to the original Lyme forests of North Staffordshire and South Cheshire that gave the town its name.

This forest forms part of an essential mosaic of local greenspace sites that will be protected for the benefit of nature recovery and carbon capture for the future and in time, further carbon reduction opportunities on selected sites will also be considered with community involvement. The site's rebranding as Lyme Park is in recognition of these new lime trees.





Silverdale is an area rich in coal and clay and has been mined extensively for over 200 years. As such, there are a number of mineshafts and seams which tunnel underneath the village and the surrounding areas.

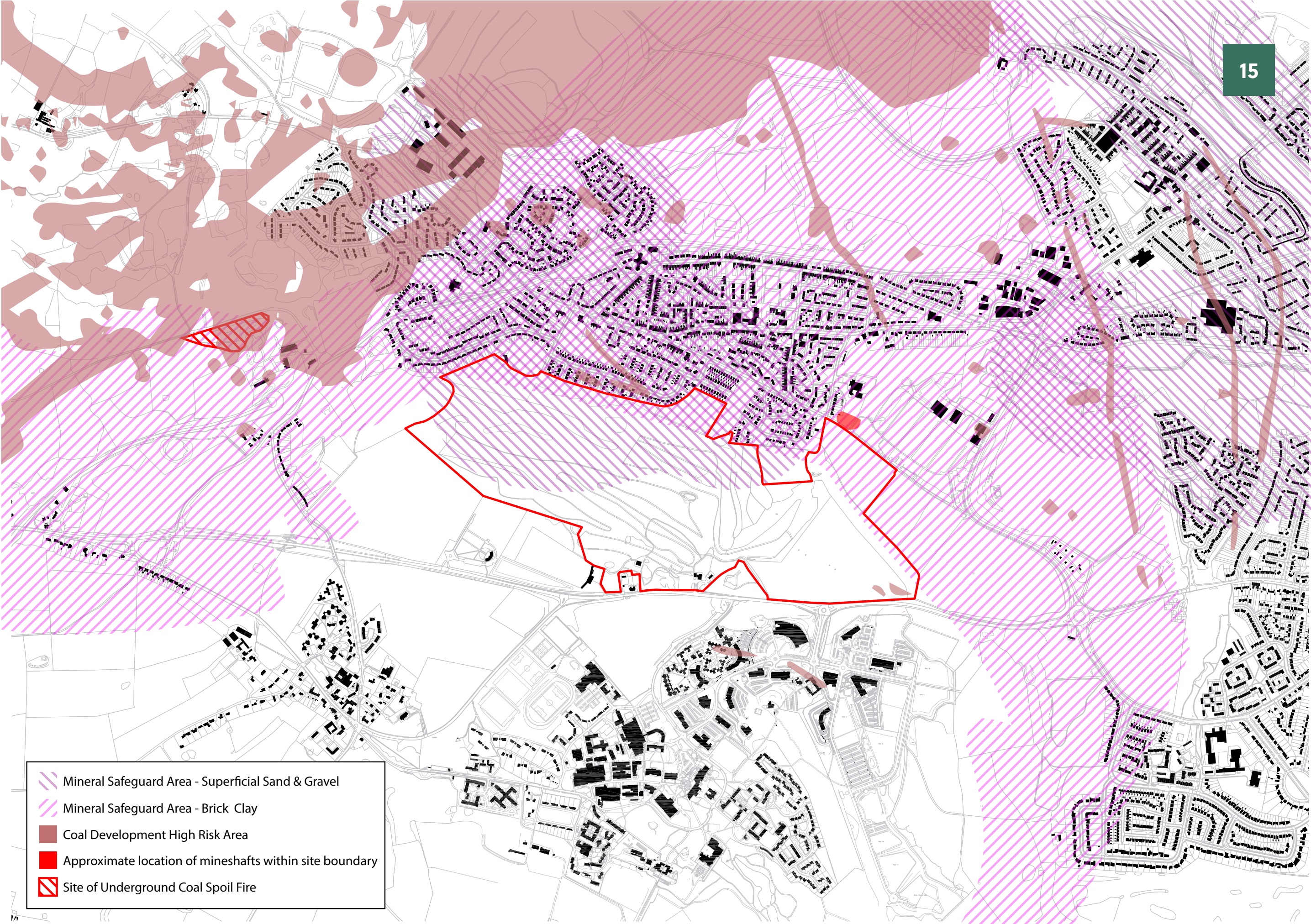
Survey work has uncovered 4 mineshafts at the northern periphery of the site, which could affect future access of development near that particular area, but there are none within the rest of the site boundary.

One of the coal spoil heaps from the colliery on Hollywood Road caught fire in 1996, and is still burning today. The fire is mostly underground, but heat and smoke have made it to the surface on occasion, setting fire to parts of Holly Wood. Any attempts to extinguish the fire would introduce oxygen, which could cause the rest of the Silverdale coal seam catching fire also. Attempts to propose housing development on the nearby land has been met with strong opposition from the residents and the authorities.

A large proportion of the land within the site boundary is classified as a Mineral Safeguard Area. This will not preclude future development, however the mineral resources present must be considered to avoid the unnecessary sterilisation of mineral resources.



Photos from the site of the fire (Anon, 2019)





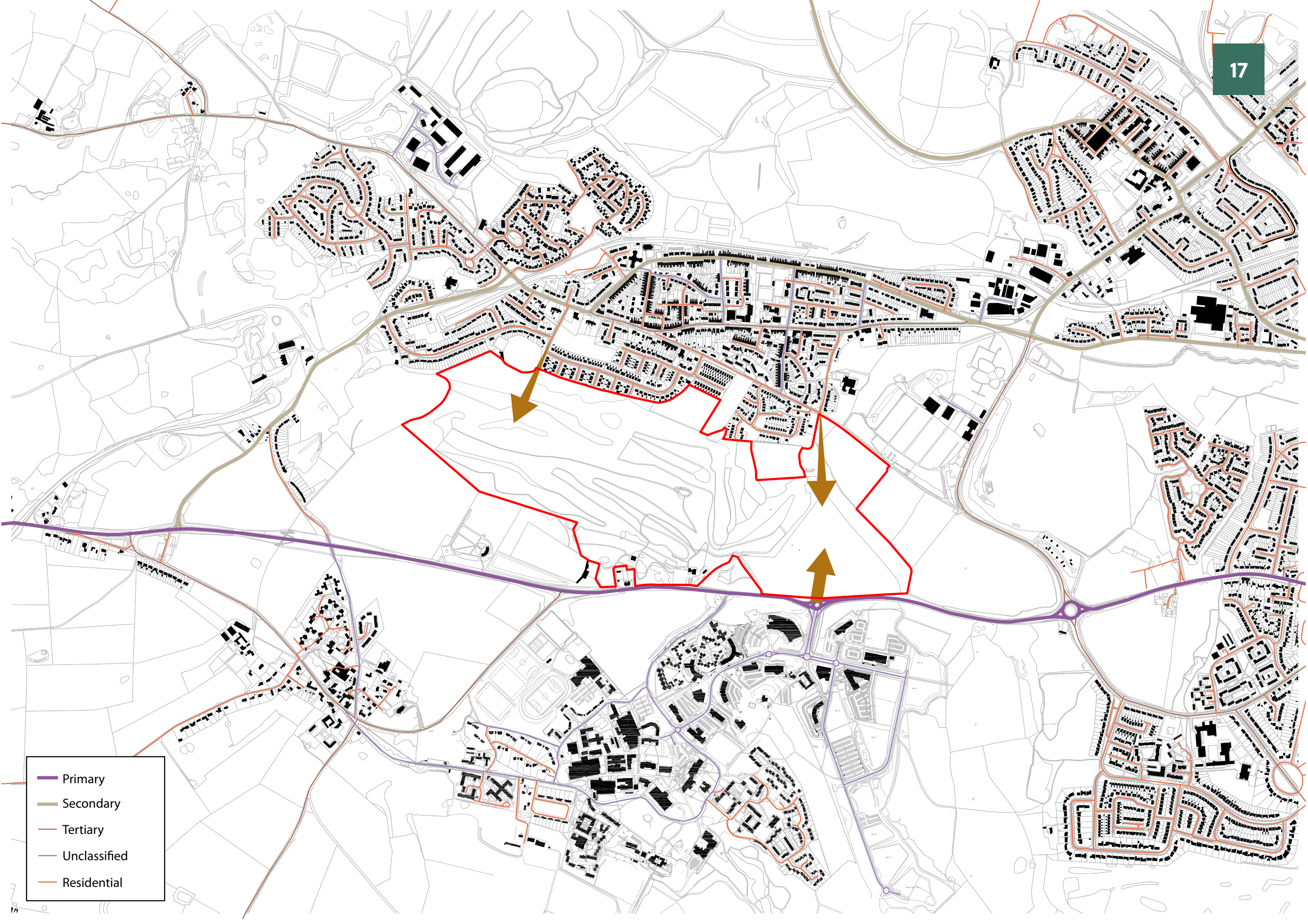
The M6 runs approximately 1 mile to the south of the site between junctions 15 and 16, with Keele motorway services located south west of the university campus.

The only A road in the area is the A525 which runs from Newcastle-under-Lyme to Whitchurch.

The B5044 acts as a primary access route through Silverdale, but is separate from the High Street which has small clusters of shops along it.

Potential access points to the golf course site include:

- A new spur from the Keele Road/University Avenue roundabout to the south-east of the site
- An extension from Staveley Place to the north-west of the site
- A new road from the junction of Race Course and Park Road to the north-east of the site





Silverdale and Keele villages are primarily comprised of residential land, with small pockets of retail and commercial within.

There are 4 primary schools within 1 mile of the golf course site:

- Knutton St Mary’s Church of England Academy
- Silverdale Primary Academy
- St Luke’s Church of England Primary School
- Westlands Primary School

There is one secondary school:

- Newcastle Academy

Keele University is located to the south of the site and contains a number of housings estate which are used for staff accommodation.

There are a number of small commercial blocks and industrial estates around the wider Keele and Silverdale area. Other land uses include sports facilities for cricket and golf, a crematorium, a graveyard, a landfill and a quarry.





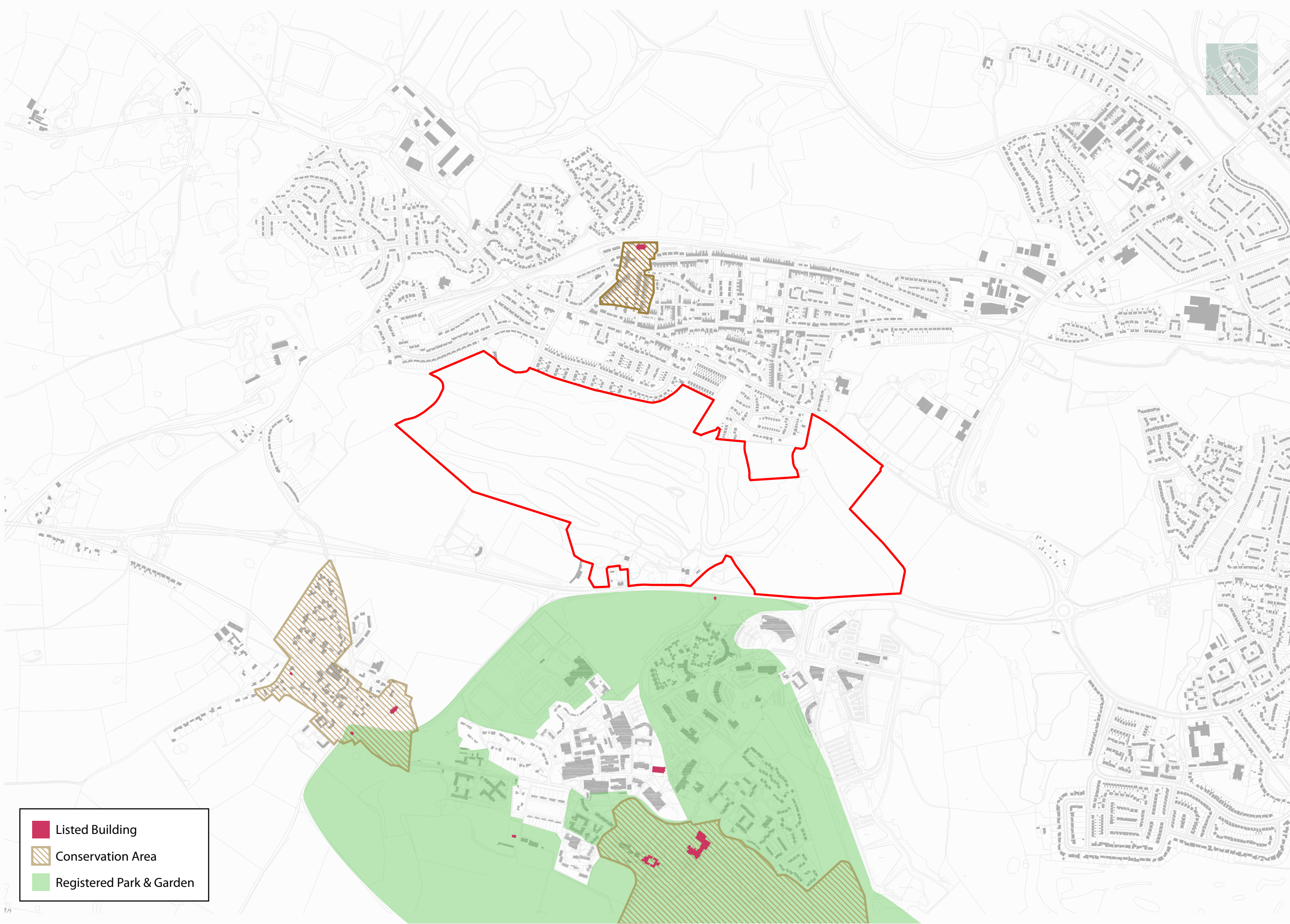
The site itself contains no listed buildings, however there are a number in the surrounding villages:

- Grade II\***
- Keele Hall
  - Church of St John the Baptist

- Grade II**
- Newcastle Lodge
  - Keele Lodge
  - Church of St Luke the Evangelist
  - 36 Keele Village

Keele Hall is situated within the listed Park & Garden of the same name, which stretches up to the southern edge of the A525.

The site does not sit within any conservation area, but there are 3 nearby, including the Keele Hall, Keele Village and Silverdale Conservation Areas.





## PROPOSED ALLOCATION

*Overview of the site's identification within the emerging Local Plan, together with the evidence based documents that have informed this*

# CHAPTER 3

## WITHDRAWAL OF THE JOINT LOCAL PLAN

Between 2013 and 2020, the Borough Council worked jointly with Stoke-on-Trent City Council to produce a Joint Local Plan. The document was subject to three rounds of public consultation during its development, but was not submitted to the Planning Inspectorate for Examination.

The Joint Local Plan was not therefore adopted and it does not form part of the Development Plan for either Council. Whilst the Joint Local Plan has no status, some of the evidence used to inform the plan contains important, relevant information to the two areas and may continue to be used or updated to inform the new Local Plan for Newcastle-under-Lyme.



As a part of the Joint Local Plan process, a Masterplan was prepared, based on concept of the University Growth Corridor. The masterplan covered a larger area than the current site, which included the Keele University Campus as well as the Former Golf Course.

The Masterplan was submitted to both Newcastle-under-Lyme Borough Council and Stoke-on-Trent City Council for consideration as part of the Joint Plan.

It justified the site's release from the Green Belt based on its strategic location:

*It is considered that a targeted urban extension to the west of Newcastle in the vicinity of Keele University campus and Science and Innovation Park will not only contribute to the most sustainable pattern of development but will also strive to strengthen key knowledge-based employment sectors creating a more diverse economy and improving the rate of graduate retention. This is essential if we are to succeed in transforming the low-skill nature of the sub-regional economy and regenerating the local housing market. It also provides a once-in-a-generation opportunity to create a unique synergy between housing and employment.*

*Release land from the Green Belt for the following reasons:*

- *The scale of housing need in Newcastle-under-Lyme which cannot be sustainably met elsewhere*
- *The unique opportunity to anchor sustainable growth around Keele University*
- *The Joint Local Plan objective to promote research and innovation in Newcastle-under-Lyme and Stoke-on-Trent*

The Joint Plan reached the options consultation which closed in August 2017. The Borough Council ultimately made the decision to withdraw from the Joint Local Plan in 2021, citing impacts from Brexit and the pandemic.



Green Belt Review

Green Belt Assessment, Part 1 (21 November 2017)  
In January 2017, Arup was appointed by the Borough Council and Stoke-on-Trent City Council to undertake a Green Belt Assessment for their respective local authority areas designated by Green Belt.

The purpose of the Green Belt Assessment was to provide the Councils with an objective, evidence-based and independent assessment of how the Green Belt contributes to the five purposes of Green Belt set out in the National Planning Policy Framework (NPPF).

Stage 1 involved dividing the whole Green Belt into General Areas and assisted in identifying areas for further assessment under Stage 2.

Stage 2 involved defining smaller Green Belt parcels adjacent to the urban areas and inset settlements, as well as in General Areas assessed as making a ‘weak’ contribution to the Green Belt.

These parcels were assessed against the five Green Belt purposes applying the same methodology as for Stage 1.

This two-stage approach enabled the whole extent of the Green Belt to be assessed and the Councils to consider weak performing General Areas in more detail.

For Stage 2, Green Belt parcels were defined using physical features which are readily recognisable. A classification of durable and less durable features was produced and applied to undertake the boundary definition.

The Former Keele Municipal Golf Course site was assessed within the Part 2 Study.

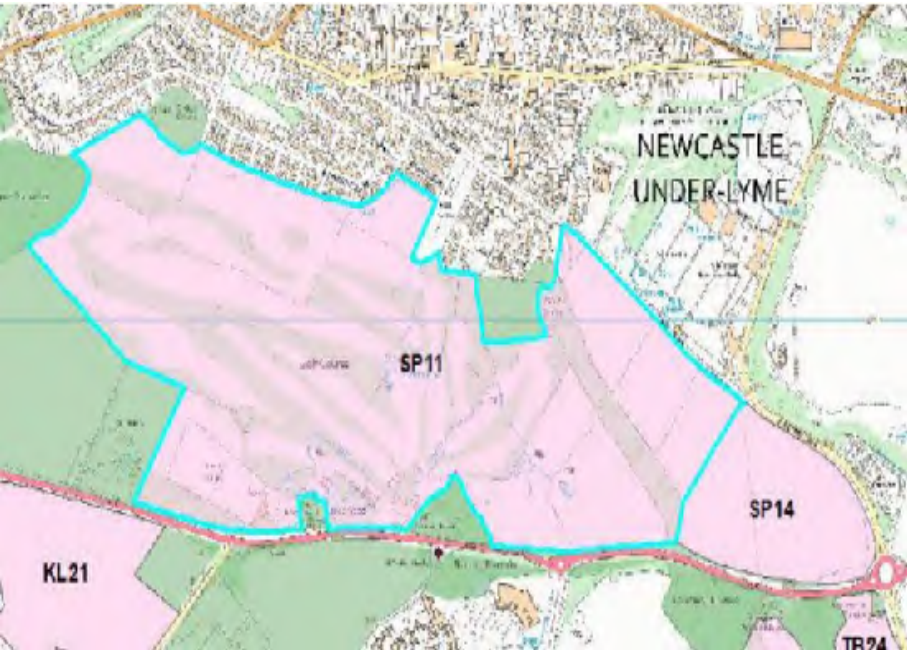
Green Belt Assessment, Part 2 (9 December 2020)

Two assessments of the Former Keele Municipal Golf Course site are contained within the Part 2 Study:

A Green Belt Site Review Proforma is contained in Appendix H (pages H107 to H110); and

A Detailed Green Belt Assessment Table of Contender Sites is contained in Appendix F (page F25).

The site is referenced as SP11:



Green Belt Site Review Proforma – Site Ref: SP11

The following is selectively lifted from the Green Belt Site Review Proforma:

<div>Summary: Is the site suitable for development? (conclusion based on all of the above including any comments from site visit)</div>	<div>Majority green - Site is considered to be suitable as it promotes sustainable growth.</div> <div>Additional comments:</div> <ul style="list-style-type: none"><li>• The site is adjacent to the Newcastle-under-Lyme urban area to the north and Keele University inset settlement is in close proximity to the south. The site is adjacent to residential development to the north.</li><li>• There is an existing access into the site from Keele Road.</li><li>• The site is within 400m of a bus stop and within 800m of a primary school, a GP surgery and an area of open space.</li><li>• The site is over 800m from a secondary school.</li><li>• The site consists of grade 3 agricultural land.</li><li>• There are no environmental designations or heritage assets within or adjacent to the site.</li><li>• There are TPOs located along the southern boundary of the site (Keele Road) and also along the north eastern boundary (Park Road) however development could avoid these.</li><li>• Consultation with the coal authority is likely due to historic mining activities.</li><li>• The site has an undulating topography which mainly slopes down from south west to north east.</li><li>• Nearly all Green Belt sites assessed in Newcastle-under-Lyme are over 1.2km from a railway station.</li></ul>
<div>Would a new Green Belt boundary be defined using physical features that are readily recognisable and likely to be permanent?</div>	<div>The new Green Belt boundary would be defined by the A525 Keele Road to the south and partly by Redheath Plantation to the west which represent recognisable and permanent boundaries. The remainder of the western boundary consists of the limits of the golf course. If the site is taken forward it is recommended that the accompanying policy states that the western boundary would need to be strengthened to create a recognisable and permanent new Green Belt boundary.</div>



Overall Site Conclusions based on Suitability, Availability, Achievability	<ul style="list-style-type: none"><li>• The site makes a moderate contribution to Green Belt purposes.</li><li>• The site is considered to be suitable as it promotes sustainable growth.</li><li>• The site is adjacent to the Newcastle-under-Lyme urban area to the north and Keele University inset settlement is in close proximity to the south.</li><li>• The site is adjacent to residential development to the north. There is an existing access into the site from Keele Road.</li><li>• The site is within 400m of a bus stop and within 800m of a primary school, a GP surgery and an area of open space.</li><li>• There are no environmental designations or heritage assets within or adjacent to the site.</li><li>• The only suitability issues relate to TPOs being located along the southern boundary of the site (Keele Road) and also along the north eastern boundary (Park Road) however development could avoid these.</li><li>• The site is considered to be available as it is owned by the Council and is not in active use although a small proportion of the site is identified as Amenity Greenspace and Accessible Natural Greenspace required to meet local standards in the Open Space Strategy 2017, and this has been excluded when calculating potential capacity.</li><li>• The site is considered to be achievable as it is viable and there are no known abnormal development costs.</li><li>• The site’s existing boundaries with the countryside to the east and west are less durable therefore a new durable Green Belt boundary would need to be created if the site were to be developed.</li></ul> <p>Overall, based on the above factors, it is recommended that the site is taken forward for further consideration.</p> <p>The site should be considered alongside the adjacent site SP14 and any release should avoid islanded pockets of Green Belt remaining.</p>
What is the impact on Green Belt function and purposes of removing the site from the Green Belt?	<ul style="list-style-type: none"><li>• Purpose 1 – Whilst entailing growth of the Newcastle-under-Lyme urban area, development would not represent unrestricted sprawl. Development would be reasonably contained and well defined along the strong permanent southern boundary of the A525 Keele Road.</li><li>• Purpose 2 – Development of the site would very slightly reduce the gap between the Newcastle-under-Lyme urban area and Madeley Heath however given the size of the gap and the existing form of the urban area, this would represent a minor decrease in the separation of the towns and it would not result in neighbouring towns merging.</li><li>• Purpose 3 - The site was formerly a golf course and is predominantly undeveloped. Development of the site would entail an incursion into undeveloped countryside.</li><li>• Purpose 4 - Newcastle-under-Lyme is a historic town however the site is not located in close proximity to the relevant Conservation Areas. Overall development would not impact upon the setting or character of the historic town.</li></ul>

Are there any cumulative impacts (due to release of adjacent sites)?	<p>There are six sites recommended for further consideration which are all in close proximity to each other: SP11, SP14, KL15, TB18, TB19 and TB24.</p> <p>Collectively, the release of all of these sites would not exacerbate any of the above impacts with the exception of purpose 3 (encroachment into the countryside) as it would entail a large incursion into undeveloped countryside.</p> <p>Release of the site should avoid islanded pockets of Green Belt remaining therefore the site should only be taken forward alongside site SP14.</p> <p>Cumulatively the release of both sites would not exacerbate any of the above impacts.</p>
Conclusion	<p>The site makes a moderate contribution to Green Belt purposes. Development would not result in neighbouring towns merging and it would not impact upon the setting or character of the historic town of Newcastle-under-Lyme.</p> <p>Development would entail an incursion into undeveloped countryside however development would not represent unrestricted sprawl as it would be reasonably contained and well defined along the strong permanent southern boundary of the A525 Keele Road.</p> <p>Overall, the removal of the site from the Green Belt will not harm the overall function and integrity of the Green Belt.</p> <p>A new recognisable and permanent Green Belt boundary would be created consisting of the A525 Keele Road to the south and partly by Redheath Plantation to the west and through strengthening the other existing boundary.</p> <p>It is recommended that if the site is taken forward the accompanying policy should recognise this.</p>
RECOMMENDATION	TAKE SITE FORWARD FOR FURTHER CONSIDERATION



Detailed Green Belt Assessment – Site Ref: SP11

Arup’s assessment of the Former Keele Municipal Golf Course site against the five purposes of retaining land within the Green Belt is set out below:

Purpose	Assessment
Purpose 1: to check the unrestricted sprawl of large built-up areas	<p><b>Moderate contribution:</b></p> <p>The northern boundary of the site is adjacent to the Newcastle-under-Lyme urban area. The boundary is predominantly less durable, comprising rear gardens, a small section of allotments, and a section of Park Road, part of which is private. The site is only connected to the built up area along this long boundary. Overall, the site makes a moderate contribution to checking unrestricted sprawl due to its less durable boundary.</p>
Purpose 2: to prevent neighbouring towns merging into one another	<p><b>Weak contribution:</b></p> <p>The site forms a less essential gap between the neighbouring towns of Madeley Heath and Newcastle-under-Lyme. A reduction in the gap would slightly reduce the distance between the towns but would not result in them merging. Overall the site makes a weak contribution to preventing towns from merging.</p>
Purpose 3: to assist in safeguarding the countryside from encroachment	<p><b>Moderate contribution:</b></p> <p>The boundary between the site and Newcastle-under-Lyme comprises rear gardens of residential developments, allotments, and a combination of public and private roads (Park Road), making this boundary less durable and not able to prevent encroachment. The boundaries between the site and the countryside comprise the Redheath Plantation to the west, which is durable; and the A525 to the south which is durable. These durable boundaries could prevent encroachment beyond the site if the site were developed. There is a field boundary to the east and the golf course boundary to the west which are less durable and would not prevent encroachment however there are durable road boundaries located a short distance beyond this. The site is well connected to the countryside along three boundaries. The site is predominantly in use as a golf course (Keele Driving Range), with a vacant field and cricket ground located adjacent to the northern boundary. A vacant public house is located adjacent to the southern boundary with access from the A525. The site contains less than 10% built form and does not support long line views (due to topography and patches of dense vegetation). Therefore, the site supports a moderate degree of openness. Overall, the site makes a moderate contribution to safeguarding the countryside from encroachment due to its mix of durable and less durable boundaries and moderate degree of openness.</p>

Purpose 4: to preserve the setting and special character of historic towns	<p><b>No contribution:</b></p> <p>Newcastle-under-Lyme is a historic town, however the site is not located within 250 metres of a relevant Conservation Area and therefore does not contribute to this purpose.</p>
Purpose 5: to assist in urban regeneration, by encouraging the recycling of derelict and other urban land	<p><b>Moderate contribution:</b></p> <p>All Green Belt land can be considered to support urban regeneration of settlements within Newcastle-under-Lyme and Stoke-on-Trent and it is not appropriate to state that some parts of the Green Belt perform this to a stronger or weaker degree. Overall this site makes a moderate contribution to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.</p>
Justification for Assessment	<p>The site makes a moderate contribution to three purposes, a weak contribution to one purpose and no contribution to one purpose.</p> <p>In line with the methodology, the site has been judged to make a <b>moderate overall contribution</b>.</p> <p>The sites makes a moderate contribution to checking unrestricted sprawl, a weak contribution to preventing neighbouring towns from merging and a moderate contribution to safeguarding the countryside from encroachment due to its moderate degree of openness and its mix of durable and less durable boundaries. The site does not play a role in preserving the setting and special character of a historic towns and makes a moderate contribution to assisting in urban regeneration</p>
Overall Assessment	<p><b>Moderate contribution</b></p>



The Borough’s Site Selection Report sets out the site selection process which has been applied to identify sites for development in the First Draft Local Plan.

The site selection process comprises several stages:

- Stage 1: establish a pool of sites to consider through the Strategic Housing and Economic Land Availability Assessment (SHELAA)
  - Stage 2: First site sift using the list of SHELAA to generate a list of sites for further consideration through the process
  - Stage 3: Decision point, to determine if there is there a need to continue with site selection process based on alignment with the distribution of development and relationship to the settlement hierarchy of centres.
  - Stage 4: Site Assessment using SA (Sustainability Appraisal), HRA (Habitats Regulations Assessment) and appropriate evidence
  - Stage 5: Evaluation and initial recommendations - have enough non-Green Belt sites been identified in the centre to meet the distribution of development. If development needs have not been met through;
    - Allocation of non-greenbelt sites
    - Discussions with neighbouring authorities to meet the Borough’s need
    - There are exceptional circumstances
- Then consider Green Belt sites for allocation
- Stage 6: Public consultation and input from statutory consultees
  - Stage 7: Final site selection

The site has been assessed within the ‘Outcomes of Site Assessment Process’ within Appendix 2 of the Site Selection Report (page 184).

Comments of note are set out below:

- Gross Site Area (Ha): 75.74
  - Density applied (dph): 50
  - Developable Area Applied: 80%
  - Developable Area (Ha): 54.58
  - Site Gross Capacity: 1,100
- A Green Belt site promoted for housing development.
  - Estimated potential capacity is based on the SHELAA methodology.
  - Part of the site is identified in the Open Space Strategy 2022 with three typologies. This includes Amenity Greenspace (approximately 3.1ha), Natural and Semi-Natural Greenspace (approximately 3.1ha), and Provision for Children and Teenagers (0.4ha).
  - A Biodiversity Alert Site (Bogs Wood) and Regionally Important Geological Structure (Job’s Wood Quarry) is on site. Developable area calculation takes this into account.
  - A Biodiversity Alert Site (Redheath Plantation) adjoins the western boundary.
  - Keele Hall Registered Park and Gardens is in very close proximity to the site to the south.
  - Estimated potential capacity calculation derived from the previous masterplan exercise as part of the Keele University Growth Corridor.
  - It is assessed as having a moderate contribution to the Green Belt.
  - The site has access to a range of services and facilities.
  - Greenbelt site.
  - As the land was previously a golf course it’s relatively flat and developable, however it is overgrown and there are now a number of mature trees on site.
  - Public right of way through.

The Issues and Strategic Options consultation was open between 1 November 2021 and 24 January 2022.

**Paragraph 8.20 of the Issues and Options document describes how,**

*‘for the purpose of the Local Plan, an urban or rural extension is considered to provide at least 1,000 dwellings. This is a minimum, and some of the Growth Directions could accommodate more dwellings. Large scale sites offer the scale of development which necessitates a greater degree of infrastructure provision. Whilst having a potentially greater impact on the landscape, this is concentrated in one area which would be subject to a comprehensive masterplan and potentially design codes. In theory, developer profit and therefore contributions are higher which enables benefits to be sought from the development to offset its impact, which can sometimes be of a scale which is also beneficial to the existing community. Depending on the scale of the extension the site may need to provide a new school, health centre and/ or local convenience retail. Development would be expected to explore optimum walking, cycling and public transport connections, and in doing so this may also result in benefits to the existing community, such as an extension to footpath or a cycle lane, for example. Extensions should be designed to maximise integration with the existing community.’*

The following potential Strategic and Rural Extensions are presented within the Issues and Options document:

- Growth Direction 1: Development on strategic sites outside the Green Belt - Large scale rural extensions
- Growth Direction 2: Strategic Green Belt release for an urban extension - University Growth Corridor
- Growth Direction 3: Green Belt release for development of strategic sites - Talke and Chesterton expansion
- Growth Direction 4: Green Belt release for development of strategic sites - Kidsgrove expansion

- Growth Direction 5: Green Belt release for development of strategic sites - Audley Rural expansion
- Growth Direction 6: Combination of strategic sites across the Borough comprising both sites outside the Green Belt and sites which require Green Belt release

Whilst not specifically mentioned within the Issues and Options document, the site (SP11) falls within Growth Direction 6:

*8.35 This Growth Direction would avoid focusing the majority of growth in one or two locations but look at each development site on its individual merits and actively aim to spread development across the Borough on large scale sites. The locations can therefore not be evaluated at this stage and it is unclear how this would accord with the settlement hierarchy.*

*8.36 Whilst this would spread the impact of development, it is unclear whether this would be a deliverable option as the ability to identify and fund a number of infrastructure projects to serve a number of sites of a large scale at different locations may be problematic. If sites were reduced in scale from approximately 1000 each to 500 dwellings, for example then they may be quicker to deliver but this has to be balanced with the issue that they are then under the threshold to deliver new schools and other facilities, adding to the impact on existing services and facilities in any one location.*

*8.37 The Green Belt Assessment Part 2 was commissioned to undertake site assessments for a selection of all sites identified as weak performing Green Belt sites and some moderate performing Green Belt sites. This option would provide the greatest opportunity to focus development on sites which had the weakest contribution to the 5 purposes of the Green Belt.*



Table 14 Opportunities and potential issues for Growth Direction 6:

Opportunities	Potential Issues
Providing choice and diversity in the housing market across the borough.	Permanent loss of Green Belt land. Would impact a number of locations and therefore the cumulative impact of such developments on the Green Belt would require consideration.
Utilises all Green Belt which have the weakest contribution to the Green Belt first although it is acknowledged there is insufficient sites to meet the need	Potential heritage and biodiversity implications – dependent upon the location of sites.
Spreads the impact of development across the borough	Spreading the development may limit the potential for strategic infrastructure improvements which may also affect the delivery of sites. For example; development may impact on a number of schools but with potentially insufficient new development at each location to provide contributions for new schools. This would be a key constraint if existing school sites cannot be expanded.
	Most weak and moderate sites are located within the areas already identified for potential extensions, all of which have some constraints relating to transport congestion and pollution.

First Draft Local Plan (Regulation 18 stage), June 2023

Following consultation on Issues and Strategic Options in 2021/22, the Borough consulted on the First Draft Local Plan between 19 June and 14 August 2023.

Chapter 15 of the Draft Local Plan identifies sites for both residential and employment allocations. This chapter explains:

The Local Plan sets out several sites for development which will accommodate the growth targets set out in the earlier chapters. Allocating land for development sets a positive planning strategy for housing and employment, providing a level of certainty over the Plan period about where development will be located.

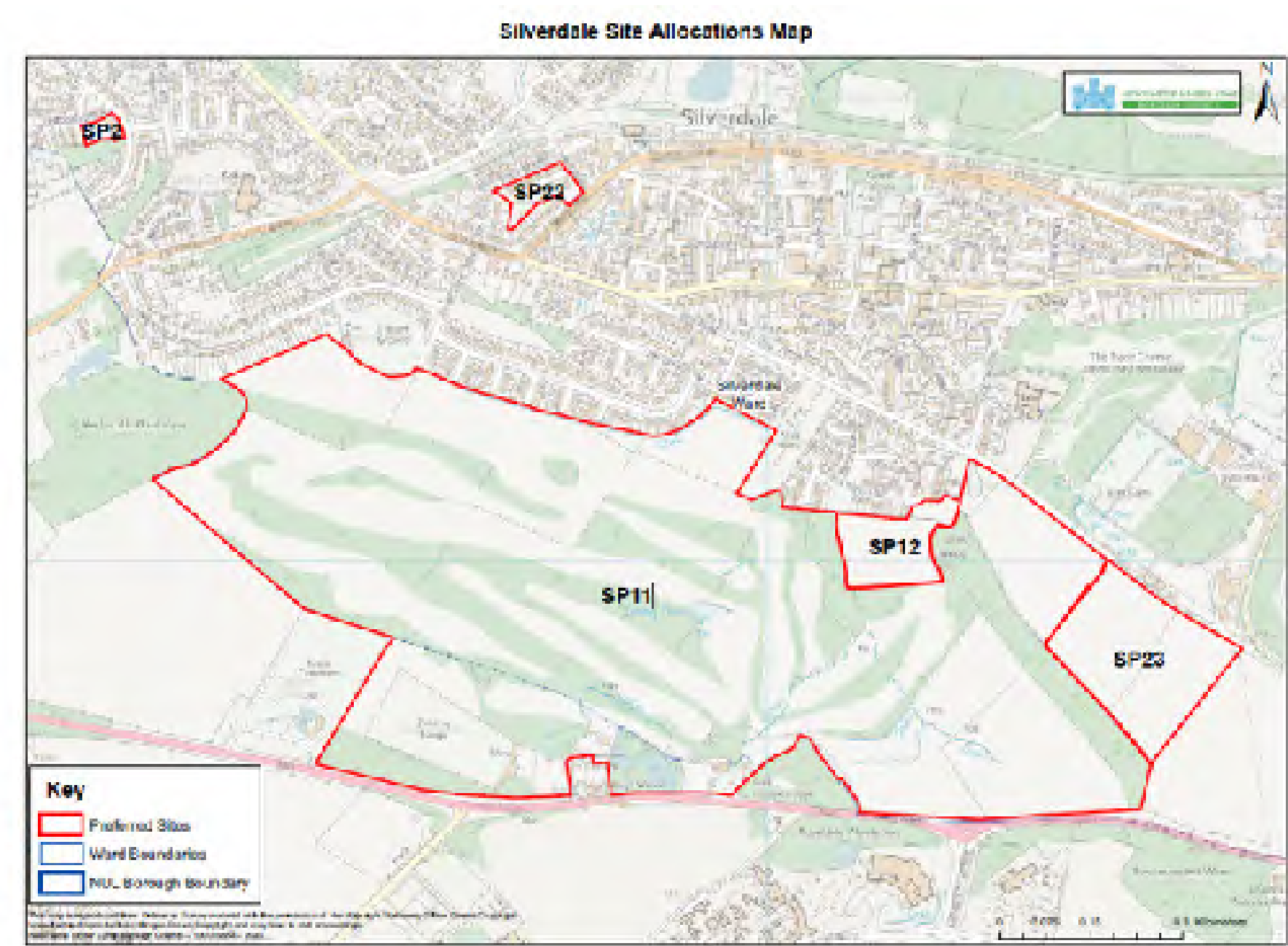
The Local Plan covers the period 2020-2040. The development requirements of the Plan will be met by counting any residential development built since 2020 (completions) any site with planning permission for housing (commitments) and allocating new sites to accommodate the residual target in this plan.

The site (SP11) is specifically identified within Table 5 Proposed Residential and Employment Allocations on pages 65 and 66:

Site Reference	Site Name/ Address`	Settlement Hierarchy (Ward)	Site Size/Area (in hectares)	Indicative Dwellings	Site specific requirements (e.g. what additional criteria is needed to be achieved on the site – may be left blank on some sites)
SP11	Former Keele Municipal Golf Course	Strategic Centre (Silverdale)	75.74	Around 900	<p>The proposed allocation will need to provide for compensatory measures and provide defensible Boundaries with the Green Belt.</p> <p>The delivery of the site will be masterplan led and will require an infrastructure delivery statement.</p> <p>Delivery of the site will need to mitigate the loss of Bogs Wood (Biodiversity Alert Site).</p> <p>Junction Improvements along the A525 required to provide access to the site.</p>



Allocations Map for Silverdale is contained within Appendix 4 of the Draft Local Plan (page 93):



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# REPRESENTATIONS/ASSESSMENT

*Commentary to demonstrate how the site is available, suitable, deliverable and developable*

## CHAPTER 4

The First Draft Local Plan (Regulation 18 stage, June 2023) proposes that the Former Keele Municipal Golf Course site be removed from the Green Belt and allocated for residential development for circa 900 dwellings.

Our client supports this proposed allocation.

This chapter demonstrates that the site is available, suitable, deliverable and developable and, therefore, viable for allocation within the Local Plan.

It is structured around the following themes:

- Commentary on the Green Belt Review
- Available, Suitable, Achievable Masterplan;
- Technical considerations:
  - Highways and Access;
  - Contamination;
  - Flood Risk;
  - Ecology;
  - Heritage / Archaeology;
  - Acoustics;
  - Air Quality.
- Summary



We have undertaken a masterplanning exercise that has explored a series of options for the site. This has resulted in a preferred option illustrated in this section that accommodates 900 homes in four villages. This has been driven by the following principles:

- Green Space: To retain a significant area of green space/country park for recreational use by local people and for this space to extend across the site.
- Trees: To retain the maximum number of existing trees
- Topography: To respect the topography of the site so that new development and roads work with the contours of the land
- Ecology: to respect the ecologically sensitive parts of the site particularly the ponds on Keele Road.
- Access: To enable multiple points of access so that the traffic generated by the development is dispersed rather than being focussed on one junction.
- Links to the surrounding facilities: The plan provides road and active travel routes to allow residents to access existing facilities in Silverdale and Keele.
- A mix of housing: A mix of housing types and densities to create a diverse community.

These principles have fed into the master planning concept. This is based on the idea that, rather than creating one large development, we should instead create four distinct neighbourhoods, each with its own identity. These neighbourhoods will relate as much to the surrounding communities as they do to each other so that they feel like an extension of existing communities onto the site rather than a new development.

This also has advantages in terms of development phasing because these neighbourhoods could be developed simultaneously as series of separate sales points which will substantially increase the attraction to developers. We have explored a series of densities as part of the master planning process. The preferred option is based on a lower density scheme with three residential densities of:

- 45 dwellings per hectare: This density is used in the heart of each neighbourhood and would include a mix of short terraces and semi-detached homes.
- 35dph dwellings per hectare: Medium density areas would consist largely of semi-detached homes
- 25dph dwellings per hectare: The lower density fringes of each neighbourhood would consist of mostly detached homes.

Masterplan Strategic Plan





Illustrative Masterplan



Each of the neighbourhood also has its own road access which will assist in developing separate identities. This will also distribute the impact on the road network. As described in the transport section, we are showing a vehicle route through the site linking three points of access on Keele Road with a potential link to Ashbourne Drive. This will create a permeable layout linking the neighbourhoods. It will however be designed in such a way to discourage through traffic.

The four neighbourhoods would be:

1. Keele Square

A development of around **256 homes** accessed from the existing roundabout on Keele Road. The neighbourhood is on gently sloping land and is planned around a landscape square which will also form a local centre.

2. Keele Woods

A development or **315 homes** based on two points of access from Keele Road, one through the former golf clubhouse and the other through the driving range. It may be that both are not required depending on ecology and other constraints, but it is useful to keep the two options. This neighbourhood is also based around a green space with arms of development extending along the former fairways retaining the backs of tree planting.

3. Ashbourne Drive

This is proposed as a neighbourhood of **233 homes** in the north-west part of the site, accessed from Ashbourne Drive. This scheme also has a village green and is planned to preserve the significant bank of trees running east to west through the site.

4. Park Road

The final, slightly smaller neighbourhood of just under **100 homes** is on Park Road. This is physically separated from the rest of the site by a major bank of trees and would therefore feel like a very different place. The layout preserves the existing play area.

This layout allows the site to be marketed either as one scheme or as four different development parcels providing maximum flexibility. The scheme going forward would need to be subject to a Design Code that would create distinct identities for each of the neighbourhoods. The public realm would be retained for public use and also to maximise biodiversity net gain.



Our client seeks the site’s release from the Green Belt.

In January 2017, Arup was appointed to undertake a Green Belt Assessment. Stage 1 involved dividing the whole Green Belt into General Areas and assisted in identifying areas for further assessment under Stage 2. The Former Keele Municipal Golf Course site was assessed within the Part 2 Study.

In this section, we review Arup’s assessment of the site and provide our view against each Green Belt Purpose.

**Purpose 1: to check the unrestricted sprawl of large built-up areas**

Review assessment: Moderate contribution

Our assessment: Weak contribution

The Review identifies that the northern boundary of the site is adjacent to the urban area, but considers the boundary to be predominantly less durable, comprising rear gardens, a small section of allotments, and a section of Park Road. The Review advises the site is only connected to the built-up area along this long boundary. This is not disputed. The Review advises that, overall, the site makes a moderate contribution to checking unrestricted sprawl, due to its less durable boundary.

The Review appears to have come to a ‘moderate contribution conclusion on the basis that only one side of the site lies adjacent to the urban area. Whilst technically correct, this adjacency is circa 1.7km long, so is clearly not insignificant.

Development of the site would not lead to a ribbon nor isolated development. It sits in-between the built up area to its north – to which it is well connected - and Keele Road to its south, which acts as an existing barrier.

As such, we consider the development of the site would not result in unrestricted sprawl and, as such, provides a weak contrition to this Green Belt purpose.

**Purpose 2: to prevent neighbouring towns merging into one another**

Review assessment: Weak contribution

Our assessment: Weak contribution

The Review considers the site to form a less essential gap between the neighbouring towns of Madeley Heath and Newcastle-under-Lyme. A reduction in this gap would slightly reduce the distance between the towns but would not result in them merging.

We agree that the site makes a weak contribution to preventing towns from merging.

**Purpose 3: to assist in safeguarding the countryside from encroachment**

Review assessment: Moderate contribution

Our assessment: Weak-to-Moderate contribution

The Review concludes that, overall, the site makes a moderate contribution to safeguarding the countryside from encroachment due to its mix of durable and less durable boundaries and moderate degree of openness.

We would argue that Keele Road, to the south of the site, acts as a defensible boundary. Whilst a PROW runs through the site, this is from Keele Road to the build up area, so it does not offer access to the wider open countryside. There is no (lawful) access from the site into the wider open countryside. The site is not agricultural land and, although modest in size compared to the expanse of the site in its entirety, the site does contain buildings.

There are no legitimate points of connection into the wider open countryside from the site, which is something that could certainly be enhanced through a carefully considered development layout.

Whilst it is hard to argue against the Review’s conclusion that the site offers a moderate contribution to safeguarding the countryside from encroachment, this perhaps is not clear cut. The site quite clearly is not a typical natural open countryside site – its ‘fairways’, ‘greens’ and tree belts are as a result of its former use. It cannot be described as a typical ‘open countryside’ site.

As such, we consider there is an argument that the site offers a weak-to-moderation contribution.

**Purpose 4: to preserve the setting and special character of historic towns**

Review assessment: No contribution

Our assessment: No contribution

The Review advises that the site is not located within 250 metres of a relevant Conservation Area and therefore does not contribute to this purpose.

We agree with this assessment.

**Purpose 5: to assist in urban regeneration, by encouraging the recycling of derelict and other urban land**

Review assessment: Moderate contribution:

Our assessment: Moderate contribution (with caveat)

It is recognised that all Green Belt land can be considered to support urban regeneration of settlements. The Review concludes that,

overall, the site makes a moderate contribution to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

Whilst we agree with the Review’s conclusion, this statement is true of all Green Belt (and open countryside outside the Green Belt) land. National guidance dictates that Local Plans should encourage regeneration within the urban area.

The point is, though, that the First Draft Local Plan explains that the Council cannot fulfil their housing needs on land within the urban area and, as such, land outside the settlement limits must be considered.

Given the site’s ‘weak’ contribution to the other purposes of retaining land within the Green Belt, we consider that the Former Keele Municipal Golf Course’s release from the Green Belt and allocation for residential development is justified.



The following section of these Representations demonstrates that the Former Keele Municipal Golf Course site is available, suitable, deliverable and developable and, as such, should be considered for a residential allocation in the Newcastle-under-Lyme Local Plan (2020-2040).

Paragraph 68 of the NPPF states that,

*‘Strategic policy-making authorities should have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment.*

*From this, planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability.*

Available

To be considered developable, the NPPF advises (bold highlights of emphasis):

*‘Sites should be in a **suitable** location for housing development with a reasonable prospect that they will be **available** and could be viably developed at the point envisaged.’*

Paragraph 019 (Reference ID: 3-019-20190722) of the NPPG sets out the factors to be considered when assessing availability:

*‘A site can be considered available for development, when... there is confidence that there are no legal or ownership impediments to development. For example, land controlled by a developer or landowner who has expressed an intention to develop may be considered available.*

*The existence of planning permission can be a good indication of the availability of sites. Sites meeting the definition of deliverable should be considered available unless evidence indicates otherwise. Sites without permission can be considered available within the first five years.*

It is confirmed that there are no legal or ownership impediments to development. The site is owned outright by the Borough Council and is available for development.

Suitable

Paragraph 018 (Reference ID: 3-018-20190722) of the NPPG sets out the factors to be considered when assessing suitability:

*‘A site or broad location can be considered suitable if it would provide an appropriate location for development when considered against relevant constraints and their potential to be mitigated.’*

Paragraph 015 (Reference ID: 3-015-20190722) lists the criteria / considerations against which sites should be assessed:

- *site size, boundaries, and location;*
- *current land use and character;*
- *land uses and character of surrounding area;*
- *physical constraints (eg access, contamination, steep slopes, flood risk, natural features of significance, location of infrastructure/utilities);*
- *potential environmental constraints;*
- *consistency with the development plan’s policies;*
- *proximity to services and other infrastructure, such as public transport;*
- *where relevant, development progress (eg ground works completed, number of units started, number of units completed); and*
- *initial assessment of whether the site is suitable for a particular type of use or as part of a mixed-use development.*

Bog’s Wood, near Site 2 - Keele Woods





These considerations are echoed throughout the NPPF. Paragraph 11 sets out that, *‘Plans and decisions should apply a presumption in favour of sustainable development. For plan-making this means that:*

- a) *all plans should promote a sustainable pattern of development that seeks to: meet the development needs of their area; align growth and infrastructure; improve the environment; mitigate climate change (including by making effective use of land in urban areas) and adapt to its effects;*
- b) *strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless:*
  - i) *the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or*
  - ii) *any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.’*

The site is most certainly situated in a sustainable location, given it lies adjacent to the strategic settlement of Silverdale, with opportunities of improved connectivity / links. Notwithstanding its existing links, it is recognised that, as a part of any future development, it will be necessary to deliver site specific infrastructure, thus ensuring a degree of self-sufficiency and sustainability.

Commentary is provided later in this chapter on the technical matters / constraints to development and demonstrates that there are no ‘showstoppers’ and, as such, that the site is suitable for development.

Deliverable

The NPPF emphasises that Local Plans should be ‘deliverable’. The term *‘deliverable’* is defined in the Glossary at Annex 2 (bold highlights for emphasis):

*‘To be considered deliverable, sites for housing should be **available** now, offer a **suitable** location for development now, and be **achievable** with a **realistic prospect that housing will be delivered on the site within five years.***

*In particular... b) where a site has outline planning permission for major development, **has been allocated in a development plan**, has a grant of permission in principle, or is identified on a brownfield register, it should only **be considered deliverable where there is clear evidence that housing completions will begin on site within five years.***

Were the Former Keele Municipal Golf Course site allocated for residential development within the Local Plan, an outline planning application would swiftly follow the Plan’s adoption, followed by a Reserved Matters application for the first phase of development.

Once the Reserved Matters permission is in place, and the necessary pre-commencement conditions discharged, construction on site would commence.

The above is most certainly achievable within the first five years of the Local Plan’s adoption.

The rest of the site and the latter phases of development would then be delivered, in their entirety, across the Local Plan period (to 2040).

Given the above, the site can be described as being deliverable.

Dense woodland near Site 4 - Park Road



Achievable

The NPPF focuses on the importance that Local Plans *‘be prepared positively, in a way that is aspirational but deliverable’* (paragraph 16). Plans should allocate *‘sufficient sites to deliver the strategic priorities of the area’* (paragraph 23).

Paragraph 020 (Reference ID: 3-020-20190722) of the PPG sets out the factors to be considered when assessing achievability:

*A site is considered achievable for development where there is a reasonable prospect that the particular type of development will be developed on the site at a particular point in time. This is essentially a judgement about the economic viability of a site, and the capacity of the developer to complete and let or sell the development over a certain period.*

Initial investigations suggest abnormalities on site may include gas protection measures, grouting of coal seams / treatment of mineshafts, some enhanced foundations and contamination remediation. Such abnormalities are deemed typical of a site like this and, whilst some areas will need to be carefully assessed, they will not preclude development from coming forward in a timely manner, as described under the ‘Deliverable’ paragraphs above.



**To inform these Representations, technical due diligence has been undertaken, which considers matters that would be assessed as a part of any future planning application, to demonstrate that there are no detrimental constraints or adverse impacts that would preclude residential development from coming forward on the site:**

Highways / Access

The site is well connected to the strategic highway network, with access to / egress from the M6 Motorway. Junction 15 of the M6 Motorway is located approximately 4.5km to the south via Gallowstree Lane, Sneyd Avenue, Dartmouth Avenue and Clayton Road.

Public Transport bus stops are located approximately 200 metres to the north of the site on High Street, providing services 1, 1A Orange, 1B and 429 to Silverdale, Wood Lane, Cross Heath and Meir. Within the Keele University site to the adjacent side of the A525 Keele Road lies further bus provision providing services 25 and 85 to Hanley, Newcastle Town Centre, Keele and Nantwich. As a part of the site’s redevelopment, there is the potential for partial or full bus access through the site to further encourage the take-up of sustainable travel modes.

The nearest train stations are located at Longport, approximately 5km to the north-east, and Stoke-on-Trent, approximately 5.8km to the east. Both stations are located on the same track / line. Provision is provided by Avanti West Coast; Cross-Country; EMR; West Midlands Trains and Northern, with services to Birmingham New Street, Newark Castle, Crewe, Derby, Nottingham, Manchester Piccadilly, Bournemouth, London Euston and Reading. The overall development area includes five points of access from the surrounding road network, three from Keele Road for the development area to the south of the site, one access from Park Road to the northeast, and the other from Ashbourne Drive to the northwest.

An internal link road runs between the three Keele Road and Ashbourne Drive access points, providing the benefits of multiple points of access to the highway network. Access between the Ashbourne Drive and Keele Road accesses is intended for residents use only, with external through movements discouraged by sensitive landscape and road

design to slow movements to those appropriate for this residential and green, outdoor leisure setting.

For the greater part of the development, it is expected that associated vehicular movements will tend to use A525 Keele Road which, as a classified ‘A’ road, is well-suited to this traffic carrying function. The easternmost access is proposed via a new spur from the existing large diameter roundabout at Keele Road / University Road. As it progresses into the site, the new spur road then changes to provide a residential spine road linking the two other Keele Road priority junction accesses to the west, one at the location of the former golf clubhouse access, and the other made via an upgraded and shared access with the former golf driving range access to the far west. Access via these two established priority junctions, being some 200m apart, with existing visibility splays and integrated footways on Keele Road, makes good use of existing highway provision.

Vehicular access for the north-eastern plot is proposed via a priority junction with Park Road with appropriate carriageway widening along the length of the site frontage to enable an appropriate standard of access. Access to the north-western plot is made either a relatively short link road to Ashbourne Drive to the north, or via a longer link south to Keele Road. As already noted, this link is intended from resident use only and will be carefully designed through landscaping and traffic management features to discourage any such movements through this residential and leisure area.

Throughout the overall development area, active travel will be encouraged and supported through high quality, convenient, safe and attractive walking, cycling and wheeling links to the benefit of those living on the site, those wishing to pass through the area, and leisure visitors enjoying access to the green spaces. These links will provide new access to the area and join the residential community to the north of the development area with the University campus to the south of Keele Road.

Ground Conditions

The site has been occupied by a golf course since approximately 1981. There is limited potential for contamination associated with the golf course, mainly relating to material that may have been imported to the site for landscaping purposes. Potential contaminants include metals, petroleum hydrocarbons, PAHs and asbestos containing materials.

Prior to the golf course, the site was predominantly occupied by agricultural land. Potential contamination may arise from the usage of pesticides or herbicides but any potential contamination would be generally diffuse and only present in the very shallow soils of the site.

Surface water features on site include multiple ponds and drains. No significant potential sources of mobile contaminants have been identified on site. Risks to controlled waters are considered to be low to moderate.

As a part of any planning application, intrusive ground investigation work, to enable a contamination assessment, would need to be undertaken. This is a very standard approach.

Risks to receptors are considered to be low to moderate, subject to the findings of an intrusive site investigation and associated analysis.

Based on the risk map and historical map evidence, the site is located within a low risk UXO area and, as such, it is considered that no further work would be required to mitigate UXO risk.

The site is located in the North Staffordshire Coal Mining Reporting Area. There are numerous worked coal seams located beneath the site and surrounding area. A Coal Mining Risk Assessment would be carried out for the site as a part of any planning application.

Flood Risk / Drainage

The site is located in Flood Zone 1 which is compatible with all types of development including residential.

There are small amounts of flooding within the site resulting from the minor watercourses which would be analysed as part of the development proposals and the impacted areas protected from development.

There are no risks from Reservoirs, however there is a small spring towards the centre of the site that discharges into a bunded pond that, whilst not considered as a reservoir, if the bunding were to fail, water would flow to the north across the site, which should be taken into account in terms of the development layout and assessments. The surface water drainage will be attenuated to the equivalent greenfield runoff and attenuation provided to contain the 1:100 year return period event with a 40% allowance for climate change before the controlled discharge is connected to the culverted watercourse.

Ecology

There are two statutory designated Local Nature Reserves (LNRs) within 2km of the site boundaries (Pool Dam Marshes c.0.66km E; Bateswood c1.95km NW).

The nearest Site of Special Scientific Interest (SSSI) is Metallic Tileries Park House, located just c.3.4km NE. The site also lies within the Impact Risk Zone of King’s and Hargreaves Woods SSSI located c.4km SE and Ford Green Reedbed SSSI located c.7.2km NE. The nearest Natura 2000 site: Special Area of Conservation is the West Midlands Mosses which is located 11.6km NW.

There are 21 non-statutory designated sites; Local Wildlife sites (LWS), retained Biodiversity Alert Sites (BAS) and Staffordshire Wildlife Trust Nature Reserve within 2km of the site boundary. The closest LWS is Redheath Plantation located immediately adjacent to the western boundary of the site. The nearest Retained BAS is Bogs Wood located within the site boundary, in the southern part of the site. The SWT Nature Reserve was located c.2km NW of the site.



Ecology (continued)

Woodland, scrub, hedgerows and areas of the improved grassland habitat present on site are considered to have potential to support foraging, commuting and hibernating Great Crested Newts. Seven ponds and wet ditches are identified within the site.

The existing buildings on site have features suitable for roosting bats such as damaged soffit boxes. Similarly, a number of trees have features suitable for roosting bats such as rot holes and callus rolls and a number of mature trees are likely to have suitable features. The woodland, improved grassland, scattered trees, ponds and scattered scrub would form moderate suitability for foraging and commuting bats. A full Preliminary Roost Assessment (PRA) would need to accompany a future planning application.

The site has connectivity to the wider habitat that is largely formed from grassland and agricultural land, with pockets of woodland and residential dwellings to the north.

The woodland, scrub, tall ruderal and improved grassland are likely to provide suitable habitat for foraging, commuting and hibernating common reptile species.

The woodland, scattered trees, hedgerows, and scrub provide suitable nesting habitat for a range of bird species.

The woodland, grassland, scrub and tall ruderal habitat present on site are considered to have the potential to support foraging and sett creation habitat for badgers, however, no badger evidence has identified within the site during initial investigations.

The woodland, improved grassland, tall ruderal and scrub present on site are considered to have potential to support foraging and hibernating hedgehog.

In terms of habitats and based on an initial site walkover, the habitats on site included buildings, hardstanding, improved

grassland, broadleaved woodland, hedgerows, scattered trees, tall ruderal, scattered scrub, ponds and wet ditches. The woodland is listed as deciduous and broadleaved woodland within online resources (Magic) and as such a Habitat of Principle Importance.

Any future planning application will likely need to be accompanying by a full suite of ecological surveys. Whilst existing habitats should be very carefully considered and protected wherever possible, these should not preclude development on the wider site from coming forward. There is plenty of opportunity across the site to integrate ecological enhancement measures:

- A variety of bat roosting and bird boxes can be are provided to cater for a range of species and roost types;
- The production of a Habitat and Species Management Plan for the creation and enhancement of habitats on site - to assist in the creation, retention and enhancement of habitats. Examples include woodland enhancement, hedgerow planting, tree planting and litter picking;

A Biodiversity Net Gain assessment will be required as a part of any future planning application. This should demonstrate a BNG net gain of 10%.

Following habitat condition assessments being conducted on the site, it is likely that habitats that are of very low-to-medium distinctiveness could be enhanced. If these habitats are retained, enhancing them would improve their wildlife benefit and increase their biodiversity value, thereby providing a net gain.

There are a number of enhancements that could be used on site to minimise the loss of biodiversity / work towards achieving a 10% net gain:

- Enhancement of woodland parcels to increase their species diversity and structure, e.g. native species planting, creating log piles and canopy thinning;

- Enhancement of improved grassland areas through relaxed mowing regimes or converting them to native and species rich grasslands, such as planting wildflower mixes;
- Any new landscaped areas associated with buildings should be derived from native and beneficial species, such as nectar rich flowers or fruiting trees, linking up habitats where possible to enhance the green connectivity across the site;
- Enhancement of the existing seven ponds within the site through management for wildlife and additional planting.

Heritage

There are no extant designated heritage features on the site.

Newcastle Lodge is a Grade II Listed building and is located circa 300m to the east of the most easterly part of the site.

Given the distance, intervening vegetation and level changes, it is questionable whether Newcastle Lodge and development on the site could / would be viewed together. It is not envisaged that the proposed development would have any impact upon the setting of the heritage asset. Were it deemed necessary, a Heritage Impact Assessment could be undertaken as a part of any future planning application, which we'd expect would conclude no / low impact.

Other heritage assets, namely those at Keele University, are sufficiently far away that it can be concluded any development upon the site would have no / low impact upon them.

Noise

Noise associated with the nearby A525 to the south and the quarry / landfill sites to the north and east would need to be considered as a part of any planning application.

There is a likelihood that some habitable rooms will require acoustic mitigation in terms of enhanced glazing and ventilation, with the possibility of the requirement for alternative ventilation dependent on the stand-off from the respective sources.

The site should benefit from inward facing outdoor amenity spaces so the buildings can provide natural screening, however, they may also require acoustic mitigation to reduce noise levels including close boarded garden fences.

The above would be the worst case and would certainly not preclude development from coming forward. Careful consideration of the site's layout at the planning application stage will mitigate the impact from noise sources - facing non-sensitive facades or uses, such as garages, towards noise sources / creating off-sets around sources / buildings / screening facing the noise source, with gardens to the rear / enhanced building envelope (glazing and ventilation products) can all be explored to ensure a satisfactory noise environment is achieved.

Air Quality

Newcastle-under-Lyme Borough Council have four designated Air Quality Management Areas (AQMAs). The site is not within one of them. The closest AQMA to the site is Newcastle-under-Lyme Town, approximately 1.5 km to the east.

Based on the low background at the site at present, there are not predicted to be any significant health issues associated with poor air quality to future residents. It is considered that any adverse impacts associated with odour will be unlikely at this site.



# CONCLUSION

*Summarising the key points*

## CHAPTER 5

# CONCLUSION

These Representations are prepared by BDP on behalf of our client, Newcastle-under-Lyme Borough Council, for consideration towards the Newcastle-under-Lyme Local Plan (2020 to 2040).

They are supportive of the First Draft Local Plan proposal to remove the Former Keele Municipal Golf Course site from the Greeb Belt and allocate it for 900 dwellings.

To support the site's removal from the Green Belt and its proposed allocation, these Representations provide commentary on the Council's Green Belt Review, confirm that the site is available, suitable, deliverable and developable and provide initial, high level commentary on the technical matters which would be considered as a part of any future planning application, to demonstrate that there are no detrimental constraints or adverse impacts that would preclude residential development from coming forward on the site. An Indicative Masterplan has been developed, which illustrates how 900 dwellings could come forward across the site. This identifies development plots of Keele Road to the south and from Silverdale to the north.

In final conclusion, these Representations demonstrate how the site is viable for allocation within the emerging Local Plan, for future development. As such, we believe it should be viewed favourably and allocated for residential development in the emerging Local Plan.

**We trust that these Representations are clear and look forward to discussing our client's site further as the Local Plan progresses. We wish to be kept inform of the Local Plan's progress please.**



**David Staniland**  
Senior Town Planner

