

**Regulation 19 Local Plan for Newcastle Under Lyme Borough Council
Response Form**

You can submit this form via e-mail to planningpolicy@newcastle-staffs.gov.uk or post it to Planning Policy, Newcastle-under-Lyme Borough Council, Castle House, Barracks Road, Newcastle-under-Lyme, ST5 1BL.

Responses need to be received by the Council by 5pm, 7th October 2024.

Personal Information:	
Title	
First Name	
Last Name	
Address Line 1	
Address Line 2	
Address Line 3	
Address Line 4	
Post Code	
Telephone Number	
Email Address	

**Local Draft Plan
Stages of development of the Local Plan (Page 4)**

Regulation 19 Publication – Not Compliant with Duty to Co-operate

When the plan was first introduced, the publication and consultation for it was limited. We were unaware of the impact for our area until the second phase. Under the planning processes laid out in the Town and Country Planning Regulations 2012, Regulation 18 notices were put up. One was placed on the lamppost, part way down Bells Hollow which is a single lane road with limited footfall and inability to be seen from a moving vehicle. The second on a lamp post part way down Talke Road, which only has a footpath on one side and is a National Speed Limit Road. This was to cover the entire neighbourhoods affected by the original CT sites as listed in the first draft which is a These two locations were not in areas of high footfall and we feel that there was inadequate publication of the regulation 18 notices in our Ward. As a community we printed the Reg 18 Notices and placed them in more high footfall areas and distributed to households in the vicinity to generate knowledge of the plans. These are steps that should have been taken by the local authority not the community.

Furthermore, no community consultations were held in Red Street. Bearing in mind that we have an aging population, the majority of which do not drive, and the very limited bus routes, we feel that the local population were not adequately informed at Regulation 18 Stage. A complaint was

lodged to this fact with the council but no response was received. It is not realistic to expect elderly residents to make informed decisions about their locality if they are not engaged.

As a community, we organised a community meeting, which was positively attended and the council again were asked to include Red Street as part of the consultation at Reg 18 as one of the largest areas to be considered for housing, it needed to be part of their plan. Most people reported that they would not have been aware of the proposals without the input from the local community and the failing of the council to execute their duty under the regulations.

Regulation 19 notices were sent to residents who had submitted responses to the Regulation 18 notice and included an email address with their response, but again, no Regulation 19 notices were published in the vicinity of Red Street to publicise the community consultation dates or the fact that responses can be submitted to the Final Local Plan. This is not sound decision making from a Local Plan communication perspective.

Local Draft Plan

Policy CT1 Land at Red Street and High Carr Farm, Chesterton (Pages 116, 117)

Green Belt - Unsound

Greenbelt land is in place for the following reasons:

1. to check the unrestricted sprawl of large built-up areas;
2. to prevent neighbouring towns merging into one another;
3. to assist in safeguarding the countryside from encroachment;
4. to preserve the setting and special character of historic towns; and
5. to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

The Green Belt Site Review Consolidated Report (16 July 2024) states that site CT1 should not be progressed if site TK17 is put forward. TK17 remains in the plan and the two sites being taken forward would constitute unrestricted sprawl and the merging of two settlements (Red Street and Talke/Butt Lane)

Furthermore, the Proforma for CT1 and CT4 states that it is within 800m of an existing Doctors Surgery. The Waterhayes Surgery, Crackley Bank is closed permanently and has been for some time, therefore the assessment is flawed.

The Proforma for CT1A also states that *“Consideration would also need to be given to the remaining area of Green Belt to the south (including site CT4) as development of this site could result in this area becoming relatively enclosed by development. Overall, based on the above factors, it is recommended that the site is taken forward for further consideration alongside site CT1 and CT4 and the area to the south of CT4 (see proforma for CT4).”* In the Regulation 19 plan, CT4 and CT1 have been removed leaving CT1A, therefore due judgement has not been completed on the area of greenbelt being enclosed by development and essentially cut off from the remaining greenbelt land in the area leading to a loss of biodiversity and isolation of wildlife in a pocket of land unconnected to the greenbelt. This is also true for Proforma CT1. According to the Green Belt Site Assessment, CT1 should only go ahead if CT4 is also included, which is not the case as CT4 has been removed from the Local Plan.

Additionally, site CT1A from the Green Belt Site Review is being taken forward in the Local Plan, however it is referenced as CT1 in the Local Plan document, which is misleading the public and making it difficult to cross reference.

Whilst CT1 has been classified as providing a weak contribution to the Green Belt, the assessment doesn't take into account the biodiversity within the site. We have a range of wildlife including mice, hedgehogs, nesting lapwings, foxes, badgers, Sparrow Hawks etc, plus meadows/hedgerows that provide homes for nesting birds such as Goldfinches and a wide range of insects, butterflies and moths. The development of this land would put at risk our local biodiversity.

Therefore the decision making is unsound as there is no justification for CT1 to be included in the Plan.

Historical Mining - Unsound

Historical mining at Talke O'The Hill Colliery has taken place on the site of CT1 between 1860 and 1930. The coal has been extracted using Pillar and Stall mining methods, leaving pillars of coal to support the land. Several sink holes and collapses have already been present on the land. Furthermore there is a fault line (High Carr Fault) present at the south east part of CT1. Please see attached map in Appendix 1 highlighting the extent of the mining on one seam in the 1920's.

The housing that is in existence has been subject to pinning and bracing and therefore there are concerns regarding impact on the existing residences for detrimental impact of the level of work that is proposed for the area.

Whilst the Green Belt Assessment makes reference to historical mining, the extent was not established by the consultants or the borough council. The extent of the mining and the location of the fault line on the site for CT1 makes it an unsound basis for taking the site forward in the final plan.

Land Ownership - Unsound

Whilst the plan is for the area to be developed as a whole, the land itself is a significant area which is currently owned by several parties. Whilst there is to be no compulsory purchase of the land and the arrangement will be between land owner and developer, what are the safeguards to ensure that the plan is fulfilled as outlined? So for example if one land owner sells and one abstains, can any properties be built? Or would this be subject to a change in planning?

Infrastructure - Unsound

We do not believe that the review of impacts of a significant housing development have drawn reasonable conclusions as to the impacts to the volume of traffic. Red Street is a small village with one main route through. This route is often used as a rat-run for when the A34 is blocked. This traffic is often speeding through the village despite existing traffic calming measures. The addition of over 1000 additional vehicles will put undue pressure on the road network, increase pollution and put our residents at risk. Red Street has a small primary school, and the traffic associated with the school run is significant and again, with no automated or manned road crossings, our school children are being put at risk.

Whilst the plan makes provision for the developers to make staged payments to enhance schools and other infrastructure projects as well as a "community hub", we are concerned that these won't go ahead, especially if the development is split between several smaller companies. The recent Moss Grove estate promised additional street lighting along Deans Lane to safeguard

pedestrians, but this was not delivered. Alongside support for extending the school provision under previous developments that again as not been provided. On clarification with the planning department, the definition of a community hub in this instance would be small retail units such as a shop, takeaway and hairdressers etc. This community hub would not have the doctors/dentist surgeries that are required to support such a large development, and many residents would have to rely on car journeys to reach such facilities. Given the information that was accessed and submitted under the last round of consultation are significantly over subscribed.

The overall plan is looking to put a significant amount of housing in a saturated area with a large proportion of the Boroughs commitment to housing being planned for Red Street, Talke, Audley, Bignall End and Chesterton/Bradwell. This will put significant strain on the infrastructure in the locality. The local primary school for CT1 is St Chad's which has capacity for 360 children with 265 on register in 2023. Having looked at the capacity in surround schools on the edge of the catchment area there is limited availability. However, these will be needed to accommodate the plan as a whole. In terms of High Schools the one for our Catchment is Chesterton High which is currently overly subscribed and operating at above capacity. Additional children on the number and types of houses that are being proposed is significantly underestimated in the proposal. If only half the houses have at least one child then over the proposed plan for Red Street that is an extra 250 children to be accommodated into local schools. Whilst the plan states that infrastructure will be considered as part of the final plan it is an aspect that needs careful consideration. Indeed, the children of 6 classes at St Chads are still based in portable buildings, which suffer extreme cold in winter and extreme heat in summer, following the Waterhayes development built in the 1990s.

In terms of other aspects of infrastructure, there are 3 local GP's surgeries, all with proposed increasing in housing in the localities, therefore the already significant wait for non-urgent appointments will be significantly stretched and increase the pull on resources for other areas of the NHS such as Walk In Centres and Emergency Departments. As for Dental provision, according to find an NHS dentist- nearest taking NHS patients is Manchester. Announced this week are the plans for one of the main dental practices in the locality -Wolstanton Dental Practice is converting to a private practice therefore reducing the provision for the area and only providing a NHS dental service of 2 days a week.

Infrastructure is significant part of any community and with a high number of elderly populations who are reliant on public transport to get about- the bus routes have been reduced cutting off access to the infrastructure. So for example there is no longer a bus service to Audley from Red Street where one of the two main GP surgeries are located. Also community based services such as the local doctors has recently closed so now it is Loomer Road or Audley for access to health services. This is just one example of how the reductions that have had to be made which have reduced the infrastructure in the area.

The local plan document doesn't set out a justification or a means of this being enforced to ensure that the infrastructure enhancements are of the correct nature or will actually go ahead.

Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound in respect of any legal compliance or soundness matters you have identified at above:

We seek the removal of CT1 from the local plan. The Greenbelt assessment states that CT1 should not be in the plan if TK17 remains. TK17 has remained in the local plan. Additionally, the Greenbelt assessment states that CT1 and CT4 should be taken forward together. CT4 has been removed from the plan. Therefore, we are

seeking removal of CT1 so that the plan falls in line with the site selection process and supporting information outlined in the Greenbelt assessment.

Additional Comments:

Appendix 1

