



Planning Department  
Newcastle-under-lyme Borough Council  
Civic Offices  
Merrial Street  
Newcastle-Under-Lyme  
ST5 2AG

**Council Offices – No 2**  
**Druids Way**  
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**Staffs**  
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17/03/2014

### **13/00970/OUT - Residential development ... on land north of Pepper Street, Keele**

Keele Parish Council wishes to add to their already submitted objections to the above outline planning application. These are in response to information available after the submission of our original consultation documents.

#### **A. Government Clarification on Very Special Circumstances in the Green Belt**

One of the three very special circumstances (VSCs) put forward by the applicant to justify development in the Green Belt is the unmet housing provision within the Borough. Recent clarification from the Government makes it clear that this justification is not valid.

The National Planning Policy Guidance (NPPG) issued on Thursday 6 March 2014 makes it clear that unmet housing provision is not a valid VSC.

The accompanying Ministerial Statement re-affirms this and we quote:

“I would particularly note that we are:

- Re-affirming Green Belt protection, noting that unmet housing need is unlikely to outweigh harm to the Green Belt and other harm to constitute very special circumstances justifying inappropriate development.”

In the light of this clear ruling by the Minister we ask the Planning Officer to draw this to the attention of the Planning Committee and we would argue that this VSC claimed by the applicant is contrary to national policy and should be dismissed.

We note that the Borough's own assessment of unmet housing needs clearly states that there is “a small surplus in the rural areas: capacity of 692 compared to a requirement of 629.” (Strategic Housing Land Availability Assessment (2013/14), p.5)

#### **B. County Highways Authority Report**

The report by the CHA, ported onto the Borough website on 5 March, does not address the following issues should have been considered as part of a highway safety report.

#### **Footpath widths**

**Keele Parish Clerk: Clare Dillow (locum) • Email : [clerk2.keelepc@gmail.com](mailto:clerk2.keelepc@gmail.com)**

#### **Councillor Contact Details**

**Graham Bibby** 01782 622574 – **John Downing** 01782 719974 – **Duncan Hindmarch** 01782 627258  
**Sue Hughes** 01782 627333 – **Wenslie Naylor** (Chair) 01782 627243 – **Val Newman** (Vice Chair) 01782 714790  
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The report fails to consider the width of footpaths along the whole stretch of the road. (In places it falls to under one metre.) We note that the proposed development would increase pedestrian traffic along this road and that the safety of pedestrians should be considered.

#### **Pinch point in Pepper Street**

No consideration has been given to the narrow section of Pepper Street opposite Quarry bank which is only 5m wide and where 2 large vehicles cannot pass. The Manual for Streets indicates that the normal minimum carriageway width for such a road should be 6.5m and 7.3 if there is on street parking. Increasing the number of vehicles through this narrow pinch point will affect highway safety.

#### **Lack of visibility at the junction of Quarry Bank Road and Pepper Street**

No consideration has been given to the lack of visibility to the south west from Quarry Bank Road at its junction with Pepper Street. Increasing the number of vehicles using Pepper Street will affect highway safety at this junction.

We believe that these highway safety issues should be taken into account by the Planning Authority in coming to its decision.

#### **C. S106 contributions**

Both the Highway Authority ( £74,028) and the Education Authority (£381,249) call for S106 contributions, totalling £455,277. The Application clearly states (Sec.8.4 p.47) that:

“Section 106 contributions for education, highways and affordable housing will not be provided as part of the scheme.”

So who will pick up the bill for the outstanding claims made by the above two authorities if permission is granted?

#### **D. Network Rail**

Network Rail's submission includes the following:

“As the land is still within Network Rail ownership and still considered to be operational railway land the developer is therefore requested to submit full details of the proposed work, including drainage, piling and excavation/earthworks to the Network Rail Asset Protection Team and a topographical survey is to be completed. We would request a condition is included in the planning consent to ensure that the applicant's works on site do not cause any instability to the tunnel and our land both during construction and at the permanent stage.”

The revised plan clearly shows houses built on and close to the tunnel in contravention of Network Rail's requirements.

Yours sincerely,



Mrs C Dillow  
Clerk & RFO  
For and on behalf of Keele Parish Council

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