Newcastle Borough Council Local Plan Issues and Options Consultation - closes Monday 24th January 2022 at 5pm

How the Local Plan impacts on Audley Rural Parish:

All residents of the Parish should input into this important consultation on **Newcastle under Lyme Borough Council's Local Plan** which ends on 24th January 2022.

You can view this here or download as a PDF https://www.newcastle-staffs.gov.uk/planning-policy/local-plan/2 or you can view a paper copy of the 'Local Plan Issues and Options' document in Audley library.

At this stage the proposed sites for housing are not yet known, so you cannot comment on any Audley Parish housing sites other than the Strategic Employment site AB2 (Junction 16 Park Lane/Moat Lane). However, the outcome of this consultation will decide where the housing sites will be focused and what happens to our Parish (and the Borough) up until 2040. This is your only opportunity to make your views known and influence what happens next.

Timescale for the production of the Local Plan:

- 1st Stage Issues and Strategic Options Consultation ends 24th January 2022
- 2nd Stage Draft Plan Consultation (includes housing sites) in Autumn 2022
- 3rd Stage Final Plan Consultation in Summer 2023 expected to be adopted early 2024

How to respond:

The Borough Council are encouraging online responses, but you can still respond in writing (not email as they will reject this stating if you have internet access you must use the portal). You should address your response to Planning Policy, Newcastle under Lyme Borough Council, Castle House, Barracks Road, Newcastle-under-Lyme, Staffordshire, ST5 1BL to be received before 24th January 2022. Make your feelings known to them now formally in writing, if you are not happy with how you have been consulted.

You can also attend a consultation event to get an better understanding of the document:

Location	Venue	Date	Time
Audley	Methodist Church	Tuesday 11th January 2022	15:00-19:00
Borough-wide Virtual	Zoom meeting or phone call	Wednesday 12th January 2022	12:00-19:00
Keele	Village Hall	Thursday 13th January 2022	15:00-19:00

If you want to speak to an officer, you should book on to attend these by ringing 01782 742467 or emailing planningpolicy@newcastle-staffs.gov.uk

What happens after the Local Plan consultation?

All landowners and developers are being asked to put sites forward for consideration. These sites will be assessed by the Borough Council to consider if they are suitable and deliverable as potential housing sites. These will be used for the next stage.

Once the outcome of the Local Plan consultation is known, they will then move forward with the next stage of the plan. At that stage **the actual sites** which are considered suitable will be made available to the public. This will be determined by the outcome of the Issues and Options consultation i.e., based on where people think the growth (new housing) should be. This could be any one of the 6 listed in Section 8 of the Local Plan Issues and Options document.

The Borough Council are required by the Government to have long term plan in place for developments. If they do not have a Local Plan, development will still continue and there is a greater risk of speculative developments going ahead in an uncontrolled way. The process for the Local Plan is outlined here https://www.newcastle-staffs.gov.uk/downloads/file/428/local-development-scheme-2021-2024

Audley Rural Neighbourhood Plan

Please note the Audley Rural Neighbourhood Plan does not determine the housing and employment sites – that is for the Local Plan. In addition to your responses sent to the Borough Council directly, we will also look to separately influence the Local Plan through our local Evidence Base to get the best for our Parish.

The Audley Rural Neighbourhood Plan Steering Group will be formulating their views and responding to the consultation. We will also put our response on the website as soon as it is complete.

You can find out more about what a Neighbourhood Plan on the website https://www.audleyplan.org/

Please do respond before the deadline at 5pm on 24th January 2022 – either by writing directly to them or via the Consultation portal

Local Plan Issues and Options Consultation – Things to consider when you respond to the consultation:

You should read the whole of the Local Plan consultation document to understand it in context. This is just a guidance note to help you formulate your response, you may have other things which are important to you.

You can download the Local Plan Issues and Option document as a PDF to cross reference against the page numbers referred to in this document https://consult.newcastle-staffs.gov.uk/resources/portal/supportingfiles/737024

However as **minimum** we suggest you look at the following areas in greater detail and respond:

- 1. <u>Section 6 Options for Growth</u> Table 4 Summary of growth options housing and Table 5 Summary of growth options employment– **page 25 of the PDF** onwards
- 2. <u>Section 7 Hierarchy of Centres</u> Suggested Policy for the Hierarchy of Centres page 30 of the PDF onwards
- 3. Section 8 Strategic Urban and Rural Extensions see page 35 of the PDF onwards
- Section 11 Strategic Employment site Junction 16 site page 53 of the PDF onwards

<u>Section 6 Options for Growth - Summary of growth options - Housing</u> and Summary of growth options - employment- page 25 onwards

What it means:

Housing Land - On **page 25 (Table 4 below)**, the Borough Council state that there is a need for between 7000 new houses up to as many as 8900 new houses required to be built across the Borough until 2040. The Government suggest that 7000 homes should be built as a minimum.

The Borough Council (**page 34**) can only accommodate 2500 of these new homes on existing development and brownfield sites. Therefore, they need to find sites for between 4500 and 6400 new homes across the Borough – potentially on greenfield and green belt sites to meet this gap. This is important as it is relevant to Section 8 - Strategic Urban and Rural Extensions – see **page 35** onwards.

Table 4 Summary of growth options - housing

Option		Dwellings per annum	Total dwellings requirement 2020-2040
1	Nationally set	350	7,000
2	Sustainable growth	410	8,200
3	Greater Job growth	445	8,900

Employment Land - The Local Plan states we already have a surplus of employment land available, an additional 7.2 hectares (**see page 24 and Table 5 below**). However, they do not think this is the right type of employment land, as there is a need for large sites which are located near to the motorway and can take large warehouses.

Table 5 Summary of growth options - employment

Option		Need	Supply	Total requirement (surplus) 2020-2037
1	Nationally set	46.8	64.8	+18.0
2	Sustainable growth	52.6	64.8	+12.2
3	Greater Job growth	56.6	64.8	+8.2

Things to consider in your response to Question 4 – "Which option for growth is the most appropriate to use in the Local Plan"?

- Should they look to exceed the Government target (Option 1) and put more pressure than is needed on our Green Belt and Greenfield?
- Does the calculation for employment land required take into account changes in working practices post-covid (i.e. more hybrid/home working)?
- Will the growth calculations be adjusted once the 2021 census data is available?
- Will the population grow like they think? See below findings:

Currently, (2020) the growth rate in the population of England is 0.6% (gov.uk).

In West Midlands the figure is 0.74% (MacroTrends)

In Staffordshire it is 0.35% (Plumplot).

Compare these with the low rate for Audley shown above at **0.16%**. Forecasts for the population growth rate in England up to 2040 follow the trend:

2025	0.41%
2030	0.35%
2035	0.30%
2040	0.26%

If Staffordshire, and indeed Audley Parish follow a similar trend, we can **expect a reduced growth rate over the next 20 years**. This would be in line with the trend for England.

<u>Section 7 Hierarchy of Centres</u> - Suggested Policy for the Hierarchy of Centres – page 30 onwards

What it means:

Rural Service Centres – These are defined on **page 31** as areas which "Provide a significant role in service provision to the local population and contain a number of essential services and facilities in order to meet the day to day needs of residents. Rural Centres contain a primary school, convenience shop/post office, at least 3 community facilities, some form of health care provision and are accessible by bus to Newcastle-under-Lyme town centre during commuting hours. The Rural Centres will meet some of the development needs of the Borough, commensurate to their role as villages and with the type, density and design of development seeking to protect and enhance their rural and historic character."

Audley – Church Street is suggested as a Rural Service centre. They are looking to centre new development as near as possible to this area to support the centre – see also below Section 8.

Things to consider in your response to Question 5 "Do you agree with the proposed hierarchy of centres?".

- Would existing roads and services support a large (1000+ houses as suggested page 37) increase in traffic and additional housing?
- What is it like now without the extra housing? Do you think this situation be improved?
- Is there a good, regular bus service which has easy connections to local rail networks and towns etc?
- What is the impact on Audley Conservation Area also part of Church Street?
- Should any new housing be kept to a minimum and proportionate to protect and retain the village character and feel?

- If the large employment site goes ahead at Junction 16 (see page 53) how would this impact on the Audley Rural Service Centre i.e. Church Street?
- If there was a big increase in population numbers, would Audley Rural Service Centre become more like a small town and lose its rural village identity?
- Would people in the new houses choose to travel in cars to shop in Crewe, Nantwich, Alsager rather than by Newcastle and Kidsgrove Towns?
- How will 1000 homes impact on the parish of 3800 homes?

You can view the report on Rural Hierarchy of Centres Topic Paper (Oct 21) here by clicking this link Link for Rural Hierarchy of Centres Topic Paper Oct 21

Things to consider in your response to Question 6 "Do you have suggestions for new development sites within development boundaries?"

- Do you know of any land which could be built upon without going into the Green Belt?
- Are there any sites in the villages which would be large enough for new housing?

Things to consider in your response to Question 7 – "Are there any areas in Newcastle-under-Lyme, Kidsgrove and within the development boundaries of Rural Service Centres that should be protected from development?"

The Audley Rural Neighbourhood Plan has already identified a potential for 90+ local greenspaces which we think meet the criteria for protection. You can also refer to this list as a starter and/or suggest others. See https://www.audleyplan.org/greenspaces.php for this list.

Section 8 - Strategic Urban and Rural Extensions -page 35 onwards

What this means:

Page 37 states – "For the purpose of this 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."

Based on the information in Section 6, they will ask for your views on where you think this the growth (new housing development) should be through what they call 6 Growth Directions (options) see **page 37**:

- 1. Growth Direction 1: Development on strategic sites outside the Green Belt Large scale rural extensions
- 2. Growth Direction 2: Strategic Green Belt release for an urban extension University Growth Corridor

- 3. Growth Direction 3: Green Belt release for development of strategic sites Talke and Chesterton expansion
- 4. Growth Direction 4: Green Belt release for development of strategic sites Kidsgrove expansion
- 5. Growth Direction 5: Green Belt release for development of strategic sites Audley Rural expansion
- 6. Growth Direction 6: Combination of strategic sites across the Borough comprising both sites outside the Green Belt and sites which require Green Belt release

Things to think about in your response to Questions 8, 9, 10 and 11:

If the majority of people agree this is acceptable as part of this consultation, this could see a minimum of 1000 homes built in Audley – see **Growth Direction 5** page 42. You will not see any actual development sites at this stage. However, it is also important that you look at the other options and let them know if you agree to the alternatives.

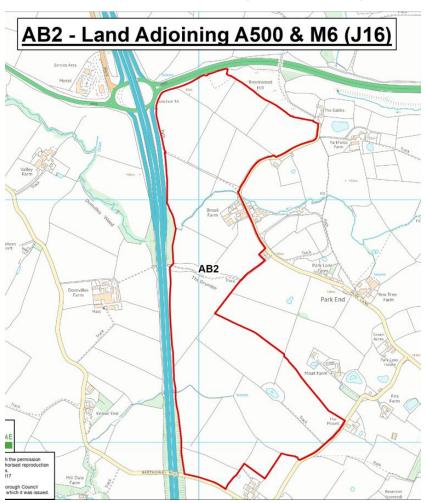
You might want to consider the following points in your response:

- Would the other growth directions be better alternatives to Growth Direction 5?
- Should they consider using some of the 7.2 hectares of surplus employment land for housing instead?
- Should they focus on most of the new houses as near to the town centre? There is a £23.6 million Town Investment Plan for Newcastle town centre regeneration.
- Should any large housing sites be located closest to the promoted links to Stoke HS2 rail connection to encourage sustainable travel?
- Is any development best placed on brownfield and if necessary greenfield, before looking at the weakest green belt sites?
- If they build lots of housing in the north of the Borough are people more likely travel out to Nantwich, Alsager, Crewe, Manchester to shop or work rather than Kidsgrove, Newcastle or Hanley?
- How many extra car journeys would this create being so far from the main town centres?
- Would this encourage more to commute on rural roads being on the outskirts of the Borough?
- Would this contradict their Strategic Objective SO-VI regarding preserving character of rural villages?
- Should they look to alternative uses for redundant town centre buildings maybe for residential?
- Should they change policies to allow larger extensions on existing homes, large garden developments, annexes and conversions of redundant buildings?
- Should they consider more low-rise accommodation in the town centres to maximise the units on the space available?
- Should there be more encouragement for permitted development rights to be used to build upwards on existing buildings around Newcastle town centre?
- Should development be spread across all Rural Centres not just Audley i,e. Loggerheads, Madeley, Baldwin's Gate, Betley, Keele as well as Audley?
- Will these have a negative impact on openness of Green Belt?
- Any other suggestions?

Section 11 Strategic Employment site – Junction 16 site AB2 – page 53

What this means:

Based on the information already discussed in Section 6, you are also being asked to comment on two strategic employment sites – see **page 53**. One is the large site from Junction 16/A500 down to Moat Lane/Park Lane, Audley. The other is by Keele Science Park.



The Local Plan states we have 7.2 hectares of surplus employment land (see page 24). But they say this is not the right type of employment land, because they need a large site near to the motorway.

The site they are proposing is "approximately 70 ha in size and has the potential to provide approximately 2.4million square foot (sq. ft) of employment accommodation, including multiple buildings in excess of 300,000sq.ft, with the largest building of approximately 1 million sq.ft, plus ancillary accommodation."

You should complete your views on this within **Question 3** and **Question 4.** You should also complete your views on **Question 17**, **Question 18** and **Question 19**.

Things to think about in your response to Questions 3, 4, 17, 18 and 19:

Environmental issues:

- 170 acres (70 hectares) represents a loss of 6.3% of the parish (being 2717 hectares) is that proportionate and appropriate to a "rural" Parish (and this is before there is any consideration to the overall impact of possibly 1000 homes)?
- Is this site irreplaceable due to its uniqueness, brook and hilly landscape in places?
- What about the illumination and noise impacts on the rural character of the Parish (24/7 over 365 days a year?)

- There is currently a natural brook that runs through the middle of the site... flood zone 2 and 3 (highest) so what impact will this have on other areas if they divert it?
- Will they re-provide new habitats to minimise the overall loss of such a large amount of wildlife habitat?
- Where is the Environmental Impact Assessment for the loss of 70 hectares of Green Belt taken from the Parish?
- Will it impact on long reaching views due to the openness of the site and other areas –
 e.g., can you see long stretching views of Jodrall Bank?
- Do you think there will be an increase in air pollution in local area?
- Would this site be better suited to renewable energy sources rather than development given it is in a vast open landscape?

Accessibility and Travel

- If the site gets developed what will happen when the M6/A500/A34/A50 gets congested/blocked?
- Which local roads will site traffic e.g., HGVs, delivery vehicles and workers use if the main access is blocked?
- Will lorries park up overnight etc on nearby roads eg Radway Green, Barthomley, Nantwich Road etc while waiting to access the site?
- Will rural roads be used as rat run/cut through to the new slip road to the A500/M6?
- How will this impact being next to the busy M6 Junction and A500 exits, with up to 3000 people all in cars accessing the site across a 24-hour period?
- What about the lack of sustainable connections? i.e., no bus/rail links to train stations Alsager, Crewe other than car.
- Will you be able to access the site by foot along the single lane rural roads which are 60 mph and no pavements or streetlighting?
- This is located at the top end of the Parish does this mean closer links to Nantwich/Crewe rather than Newcastle?
- Instead of proposing development on Green Belt land, should the Council do more to create jobs near where people live such as major economic centres of Stoke and Newcastle under Lyme rather than increase car journeys?
- The site is in an isolated location with poor accessibility to a range of services and facilities – therefore how will this support Audley Rural Service Centre to be sustainable, if it cannot be directly accessed due to the single lane rural roads?
- Where will the site workers and warehouse workers live and shop?
- How will they address the lack of off road or on road designated safe cycle route?

Impact on Health

- What will the disruption be to the parish during construction period?
- Will this impact on leisure and recreational activities popular routes for walking, horse riding, cycling?
- What will the impact be on mental health?

Employment

- Should we be encouraging growth of this sort in the neighbouring area of Stoke on Trent

 who have a large surplus supply of employment land (without green belt being affected)
 plus are trying attract investment of this sort?
- Will the creation of 2700 to 3300 jobs in the top end of the Borough, support the Borough Council's vision for the Town Centre?
- Do they need to consider additional Green Belt release of land for Strategic Employment Sites as both Newcastle and Stoke have an oversupply of potential future employment land (not in Green Belt) as shown in the table below from Turley - Economic Needs Assessment - Newcastle-under-Lyme & Stoke-on-Trent June 2020

Potential Future Supply - Excluding the 8 larger Green Belt sites

Source	Employment space, net (ha) Stoke- on-Trent	Employment space, net (ha) Newcastle- under-Lyme	Employme nt space, net (ha) Study area
Existing supply of employment			
land			
Local Plan allocations	0	57.6	57.6
Vacant land within existing	162.5	6.8	169.3
employment sites	102.5	0.0	105.5
Sites with extant planning			
permission for B-class	66.2	0.4	66.6
employment development			
Sub-total	228.7	64.8	293.4
Potential future supply of			
employment land			
Call for sites	26.2	45.9	72.0
Other sites assessed	0	28.8	28.8
Sub-total	26.2	74.7	100.9
Grand total	254.9	139.4	394.3

Source: Stoke-on-Trent Council / Newcastle-under-Lyme Council / Aspinall Verdi analysis

The Green Belt Part 2 site assessment regarding this site states - "The topography of the site is undulating and provides long line views all around the site. As such, the site supports a strong degree of openness. Overall the site makes a strong contribution to safeguarding from encroachment as it has a strong degree of openness, it is completely connected to the countryside, and the south eastern and southern boundaries are less durable". It also states "The site makes a moderate contribution to one purpose, a strong contribution to one purpose and no contribution to three purposes. In line with the methodology, professional judgement has been applied to evaluate the overall contribution. The site has been judged to make a moderate overall contribution. The site is connected to countryside along all four boundaries. The site supports a strong degree of openness. Whilst the site has less durable boundaries to the north east and south, the remaining boundaries are all durable and therefore could contain development and prevent it from threatening the overall openness and permanence of the Green Belt. In addition, it makes a moderate contribution to assisting in urban regeneration, and no contribution to preserving the setting and special character of historic towns, in preventing towns from merging and in preventing sprawl of the built up area". https://www.newcastlestaffs.gov.uk/downloads/file/752/green-belt-part-2-assessment-study

Key information about the Parish:

Newcastle has poorer outcomes and many health and wellbeing challenges which are worse than the rest of the county or the national average. We think these factors need to be considered in any planning decisions. This might include (but is not limited to) making sure there is a focus on green open spaces, which are good for promoting exercise and mental wellbeing; limits on the number of fast food outlets and hot food takeaways (particularly where already saturated in one area, and near schools); sufficient school infrastructure to ensure children's education does not suffer from development and population growth; ensuring any new dwellings are built to be kind to the environment but also to ensure people can afford to stay warm in their homes; and to reflect likely population growth within the Parish.

Educational attainment (how well children do at school)

- Based on school location, fewer children in Newcastle-under-Lyme than the national average achieve a good level of GCSEs, and this has fallen in recent years.
- Lower attainment is linked to areas facing multiple socio-economic inequalities which includes Newcastle-under-Lyme.

Overweight and obesity is a significant challenge. In Newcastle there is:

- Higher-than-average rates of obesity and excess weight in Reception and Year 6 (end of Primary) school children¹;
- Higher than average rates of obesity and excess weight in adults;
- Higher than average proportion of adults who are inactive;
- High levels of diabetes and coronary heart disease.

Levels of people with Limiting Long Term Illness (LLTI) are also worse in Newcastle:

• In Newcastle-under-Lyme, around a quarter of adults have a **Limiting Long Term Illness**. This is higher than the England and Staffordshire average.

Homes

- In Newcastle-under-Lyme, nearly 1 in 5 households are in fuel poverty. This is significantly higher than any other district across Staffordshire and also higher than the national average.
- This means that people living in these households can't afford to heat their homes properly. Cold homes can lead to worsening of health problems, excess winter deaths and more illness. It can also lead to more falls for older and vulnerable people.

Air pollution

- Newcastle is designated as a 'hotspot' for high rates of air pollution.
- Need to consider reducing reliance on cars, better public transport, eco-friendly builds, better walk/cycling infrastructure etc.
- Air pollution is the largest environmental health risk in the UK, which can have a significant impact on peoples' health.
- Walking, cycling and other forms of active travel are good for improving health and reducing air pollution, however levels of adults walking (16%) or cycling (1%) for travel are typically lower than average in Newcastle-under-Lyme.
- There are no, other than one private, public electric car charging points in the parish.
- In 2019 Newcastle-under-Lyme borough council received ministerial directions because pollution levels were above targets for nitrogen dioxide in some parts of the borough. Air

¹ Reception - Obesity 13%, Excess Weight 27%; Year 6 - Obesity 22%, Excess Weight 36%.

quality and the potential implications of any large industrial development close to the Parish would need to conduct a health impact assessment to capture and mitigate any potential impact on the health and the local population, where prevalence of disease and long term illness is already above average

Population growth and composition

- The Office for National Statistics (ONS) mid-2019 population estimate for Audley Rural is 8,549 showing that the population growth has only been around 112 individuals since the Census 2011. The population of Audley Rural Parish represents only 6.6% of the 129,400 people in whole of the Newcastle-Under-Lyme Borough.
- The Office for National Statistics (ONS) state that Audley Rural has a large population of older people, compared to the other areas of the borough. This means any development needs to consider appropriate type of housing, good insulation and affordable heating systems, easy access to community resources to ensure people can maintain their independence an reduce loneliness and isolation.
- There are around one quarter of households in Audley Rural who are families with children in 2019. The older population and the number of older households is expected to grow in the future, in line with the ageing population, which will impact on housing demand in the parish.

Table Age structure of Audley Rural population, 2011 and 2019

•	,			
Age group	2011 (Census)		2019 (ONS, estimated)	
0-15	1,413	16.7%	1,357	15.9%
16-24	811	9.6%	690	8.1%
25-44	2,062	24.4%	2,097	24.5%
45-64	2,533	30.0%	2,448	28.6%
65-84	1,404	16.6%	1,746	20.4%
85 and over	214	2.5%	211	2.5%
Total	8,437	100%	8,549	100%

Source: ONS 2011, ONS mid-2019 population estimates, AECOM Calculations

NBC should be asked to supply the Community Impact Assessment and Health Impact Assessments for any planned development (industrial/employment, housing or otherwise).

All of the above highlights the need for a strong focus within the Newcastle Borough Council Local Plan on health and wellbeing, by providing the kind of environment(s) which enable people to have healthier, more active lifestyles and maintain good health.

Borough Council's Local Plan Evidence Base:

REMEMBER within the Issues and Options consultation there are **no housing sites** to comment upon at this stage. The outcome of the views on the "6 Growth Directions" referred to in Section 8 of the Local Plan Issues and Options document will dictate the number of houses required and then the general areas e.g., Talke, Keele, Audley etc that need to be assessed to accommodate these. At that stage all of the below evidence and information may be refreshed, discounted or added to.

The only site which is a potential is Junction 16 Employment AB2.

All Landowners, developers etc are now requested to put their sites forward in the "Call for Sites" exercise – which will be assessed for the next stage. Click here to view Call for Sites NBC website

The previous evidence based for the now discontinued Joint Local Plan with Stoke is here https://www.newcastle-staffs.gov.uk/planning-policy/local-plan-evidence-base/5

For ease it is also included below:

Green belt part 2 assessment study - (see page 132) "This report prepares a site review methodology and completes site assessments for the green belt sites being considered for release through the emerging joint local plan". https://www.newcastle-staffs.gov.uk/downloads/file/752/green-belt-part-2-assessment-study

Green belt assessment part 1 (November 2017) – (*See page 114 for the sites assessed and the findings are on page 156 onwards and relate to the map on 114. This info feeds into the part 2 study above). The green belt assessment forms an objective evidence base indicating how the green belt within the local plan area contributes towards the five purposes of green belt set out in the National Planning Policy Framework (NPPF). https://www.newcastle-staffs.gov.uk/downloads/file/900/green-belt-assessment-part-1-2017-

Strategic Housing Land Availability Assessment (SHLAA) (January 2020)

The SHLAA provides a key piece of evidence to help inform the site selection and allocation process for the Local Plan. https://www.newcastle-staffs.gov.uk/planning-policy/local-plan-evidence-base/10

Economic Needs Assessment - Newcastle-under-Lyme & Stoke-on-Trent June 2020 – Information regarding

https://www.stoke.gov.uk/download/downloads/id/1759/economic_needs_assessment_newcastle -under-lyme and stoke-on-trent june.pdf