

# **Audley Rural Parish Council – Response for Local Plan – Agreed 12<sup>th</sup> December 2021**

**Q1 Do you agree with the Vision for the Borough? If not, how could the Vision be improved?**

***(By 2040, the Borough will have delivered sustainable new homes and jobs meeting local needs and providing more opportunities for people. We will have respected and improved the character and distinctiveness of our Staffordshire market towns, villages and rural areas with a particular focus on broadening our network of Neighbourhood Plans.***

***We will have enabled new infrastructure, supported the growth of businesses and our University, whilst preserving and enhancing our natural and built assets and taken action to tackle the impacts of climate change.)***

The term “Jobs” needs to be defined – variety of skilled jobs

**Question 2 Do you agree with the Strategic Objectives? If not, how could these be improved?**

SO-I -Sustainable transport connections do not feature enough to achieve this - the plan is heavily dependent on high carbon road travel with potential for homes and jobs located at the furthest point from sustainable transport connections – putting more vehicles on the road

SO-II -Agreed re advanced manufacturing, high-tech/medi-tech and green economy however this must be located in the best location which still works towards the other SOs – not in conflict or at the expense of the other SOs. Do not agree with the emphasis being on distribution and logistics.

SO-III -This should be an absolute priority and focus with all growth centred around this objective – this should be no 1.

SO-IV - This should not be conflicted by a net reduction of large scale greenfield, greenbelt proposals.

SO-V - Locations for work and also live should be linked to SOIII – otherwise more cars on road and contradicts SOI amongst others.

SO-VI - rural characters will be eroded by the proposed growth directions and large scale developments, therefore there is some conflict demonstrated in this document.

SO-VII - This is the only Borough rail station should be a key focus for work and living opportunities plus industry access to sustainable travel. Should link into Newcastle through electric buses travelling to all parts not just Newcastle. Consider smaller buses which can access rural roads to provide better connections.

SO-VIII -Evidence gathered through a community led plan should have more influence over the Local Plan housing numbers.

SO-IX This is vital but conflicted by the proposals. More emphasis placed on the provision off road safe cycling, walking and horse riding routes.

SO-X High quality skilled jobs which young people aspire to obtain, thus retaining our younger generations that feed the local economy, instead of the cities attracting them to spend their earnings elsewhere – this goes hand in hand with SOIII and SOIV.

SO-XI ....The rural nature and countryside is endangered with the focus being taking away from the urban core – resulting the borough losing its identity. No one would want to live in a village near to a 1,000,000 warehouse complex on its doorstep with all the ancillary problems that comes with it – based on experiences elsewhere in the country.

SO-XII Protect the Green Belt ....Agreed – although this plan does not seek to protect green belt – more to release it regardless of evidenced and supported need (ref Para 140 and 141 NPPF 21).

## **Section 5 Housing and Employment Need**

### **Question 3 - Do you have specific comments to make with regard to this chapter?**

The calculation for employment land required must be refreshed to take account changes in working practices post-covid (i.e. more hybrid/home working).

The growth calculations should be adjusted once the 2021 census data is available. Since 2020 the country in terms of Brexit, but also the World in terms of climate change and Covid 19 has changed in more ways than anyone expected, so must be adjusted to take account of those changes.

## **Section 6 Options for Growth**

### **Question 4 - Which option for growth is the most appropriate to use in the Local Plan?**

The evidence seems to show that the population growth over the last 10 years does not provide any justification for such a devastating loss of greenfield and greenbelt required to accommodate large numbers of housing in excess of the 2500 units on the only available brownfield. Option 1 should be considered to be the absolute maximum – but potentially given the past evidence and ageing population this should be challenged. We do not think unfounded aspirations should place any further pressure on potential loss of irreplaceable green belt and green field – which is mostly the reason for making the Borough an attractive place and draw for people to want to live in.

As per Q3 - the calculation for employment land required must be refreshed to take account changes in working practices post-covid (i.e. more hybrid/home working).

The growth calculations should be adjusted once the 2021 census data is available.

## **Section 7 Hierarchy of Centres**

### **Question 5 - Do you agree with the proposed hierarchy of centres?**

Only agreed with regards what defines the centres etc however urban areas must take more priority over rural service centres – due to existing infrastructure and the built environment already in place and the close links to the urban core.

The order for development focus should not be Newcastle, Kildersleepe, District Centres then Rural service centres - in accordance with the **SO-XI** other areas eg Neighbourhood Centres and Key Villages may be more suitable due to their closer proximity to the town centre and urban core in general and should be considered before Rural Service centres. This is because in the main the rural service centres by their very nature are located on the periphery at the furthest points from the urban core. This would mean more cars on the road, and a net reduction of green field, countryside and green belt. This would also support the £23.6 million Town Investment Plan for Newcastle town centre regeneration.

In order to retain the rural identity and feel, any development needs must be proportionate/minimal, with the sole purpose of protecting the village characteristics and distinctiveness. In accordance with **SO-VIII** – Neighbourhood Plan evidence and housing needs assessments should be given more weight in the emerging Local Plan.

### **Question 6 - Do you have suggestions for new development sites within development boundaries? (Please see the evidence base & topic papers webpages within the Planning Policy - Local Plan section of the Borough Council's website for maps of all existing development boundaries).**

Repurpose redundant and empty buildings eg boarded up retail units, should be used for residential. The surplus 18 hectares of employment land should be residential or if not mixed allocation. Generally where there are village envelopes encompassed by green belt or green field, most infill has been completed. The focus should always be brownfield, empty units or alternative uses repurposed, green field, then worst case scenario hierarchy of green belt sites e.g., weak before moderate before strong.

Look to increase permitted development rights of existing buildings. Encourage more low-rise accommodation in urban areas and upwards expansion.

**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?**

Yes – conservation areas, open spaces, locally designated green spaces, schools playing fields and recreation grounds. Boundaries should not be changed. The Audley Rural Neighbourhood Plan has already identified a potential for 90+ local greenspaces which they think meet the criteria for protection.

**Section 8 Spatial Strategy - Strategic Urban and Rural Extensions**

**Question 8: Which option/s for expansion do you support?**

A variation on option 6 on the basis of the below hierarchy – see response to Q12. Growth should be focused on the centre, and ripple outwards – if you want to support a town centre which will be thriving and a place where people want to shop, work, enjoy and live. However this should not be a scatter gun approach and should be targeted as above.

**Question 9: Which option/s for expansion do you disagree with?**

We would not support Option 1 – 5. In particular Option 5 – Audley. This is because the proposed employment site at AB2 (a loss of up to 6% of the Parish overall of which is green belt) coupled with the potential for a rural extension of a minimum of 1000 homes, would have a devastating impact on the rural character, conservation area within the Rural Service Centre and openness of the Parish. The Rural Service Centre acknowledged to be a village (not a District Centre or town) and **SO-VI** seeks to preserve this. It is also impossible to take a calculated view without seeing the detail and assessing the full impact on the Parish through both a large scale 170 hectare development with an unknown number of housing – it is impossible for the public to provide a considered view on whether this would be a supported change for the Parish. The Issues and Options document does not even allow the public to see the full extent of the 170 hectare site, as it intentionally avoids putting the proposal in the document. The concern is that the employment site of any size will automatically trigger large housing numbers.

The Neighbourhood Plan is in production and due to be drafted by June 2022. Initial views and evidence gathered would show this option would conflict and totally undermine the emerging Neighbourhood Plan. The infrastructure is not there to support a whole scale change and any change should be incremental over the life of the plan.

**Question 10 - Are there any alternative options which require consideration?**

In order to achieve the **SO-I** consideration should be given to locating developments near to sustainable travel connections – eg trains, main bus stations for interconnecting travel etc. Otherwise this will increase the reliance on car journeys to travel to work, leisure etc in rural areas which contradicts this strategic objective.

To achieve **SO-III, SO-V, SO-VI, SO-VII, SO-XII** focus should be about growing and supporting the urban core eg Newcastle as a priority, then Kidsgrove, district centres followed by the neighbourhood villages nearest to the urban core of Newcastle. The option of last resort should be an equal percentage of growth applied to ALL rural service centres including Betley, Madeley, Keele, Audley, Loggerheads, Baldwins Gate etc... to lessen the impact on the countryside/green belt and also to ensure all Rural Service Centres are sustainable, but that they are also kept rural by their very nature, not overdeveloped. Any use of the greenbelt should be targeted at only the weakest contributing sites in greenbelt and greenfield should be kept to a minimum.

Surplus employment land should be used for residential or mixed and encourage live work units in the urban core.

## **Development in the Rural Area**

***Question 11 - Should development in the rural area be spread equally across the Rural Centres? If not, how should growth be distributed in the rural area?***

Focus should be about growing and supporting the urban core to thrive in these challenging conditions e.g., Newcastle Town, then Kildgrove Town, district centres, neighbourhood villages nearest to the urban core of Newcastle – in order to meet **SOIII and SO-VII**. These areas have the best infrastructure available already in the main being closest to the town centre.

In order to achieve **SO-XI**, the option of last resort should be an equal percentage of growth applied to ALL rural service centres including Betley... to spread the load and also to ensure all Rural Service Centres are sustainable, they are kept rural by their very nature and not overdeveloped and the loss of greenbelt and greenfield is kept to a minimum.

Surplus employment land should be used for residential or mixed.

Look at others to encourage live work units in the urban core.

## **Section 9 Gypsy and Travellers**

***Question 12 - Do you have suggestions for potential Gypsy & Traveller sites which are deliverable?***

Walleys Quarry will be capped off and restored over the next 5 – 10 years before finally being fully restored in 2042. As soon as it is possible, consideration should be given to expanding the existing site at Silverdale. Consideration for other sites should be located near to areas where travellers have a preference to visit regularly year after year with the unauthorised encampments – as this is clearly where they would like to be located.

***Question 13 - Which option (I-IV above) should the Council use to address the need for transit provision?***

A mix of Options I and IV – which are sited near to where previous unauthorised encampments have been. This land is best under the sole ownership of the Borough Council to ensure that it is well managed and supervised, and there are no negative consequences for the users of the sites or those near to them.

## **Section 10 Other housing need**

***Question 14 - Should the Local Plan set an alternative target for affordable housing to the national minimum (10%), and how is this justified?***

We believe there should be a tiered system which is triggered based on the expected values to be achieved on the sites. For instance where there is evidence that developers will sell high value homes due to demand and location, then the Local Plan should be more ambitious and aim to secure a minimum of 15% affordable housing on all new housing developments. Consideration should be given to developments containing 5 or more homes to help the younger generations and those who are looking to move out of the rental market onto the housing ladder – in high value and areas in demand. We believe that communities are more likely to be sustainable if the residents are invested in the homes and areas they live in, rather than the transient rental markets for social and private.

***Question 15 - Do you agree with the general ratio of 5% social rented, 2.5% first homes and 2.5% flexibility to make up the composition of affordable homes on qualifying sites?***

We are unsure what the 2.5% flexibility means as it is not defined – i.e. is this a mix of first homes and other affordable products or social rent? On the understanding it means you can increase the amount social rent further from 5% to 7.5%, we think there should be more focus on encouraging products which allow people to own a share in their home or work towards homeownership as a priority. Based on our answer to Question 14 - As such we think there should be a maximum 5% social rent, 5% affordable homeownership products and 5% first time home products. This would help ensure that the communities are more stable and also people invest in their communities rather than being transient.

There should be covenants which stop absentee landlords purchasing these homes for private rent – to ensure the houses reach the people who are in most need of them.

**Question 16 - How should the Local Plan help to deliver accommodation for older and disabled people and the specific needs of other groups?**

Consideration should be given to schemes like Extra care, retirement villages co-housing sites, Lifetime Homes standard and other standards which ensure homes are adaptable and suitable for the older generations. Sites need to be located in areas which are near to main services eg doctors, shops or with good public transport links.

There should be large focus on this, as it is confirmed that we have an ageing population in Audley Rural Parish. As a result there is a good chance there is underoccupied properties which would provide a family home – thus meeting that need in the market. If suitable homes were available for older people and disabled to move into, then this would free up the unsuitable and larger homes for families etc.

**Section 11 Strategic Employment Sites**

**Question 17 - Do you think a strategic employment site should be allocated in the Local Plan?**

Yes providing it is in the right location and for the right type of employment which meets the aspirations of the Borough and Local plan – not just tin shed distribution centres which tend to be low skilled employment plus spoil the attractiveness of the countryside and Borough's appeal.

A better alternative would be to look at extending the Chatterley Valley 4 miles down from the M6 on the A500 and with a main rail line link – located within the neighbouring authority of Stoke on Trent. Alternatively another site, potentially brownfield, along the A500 corridor which is much further away from the Junction 16 exit from the A500 to relieve the pressure on the exit to the roundabout. There are already large numbers of warehouses proposed in the vicinity of Junction 16 – it is in danger of becoming saturated with high carbon and air polluting industry. However we would not support AB2 being used. It is not in the right location being on top of a strategic motorway junction which traffic congestion and accidents are endemic at the best of times. Often the outlying villages are used as cut throughs when the M6/A500/A50 or A34 are congested. Even when not, people tend to use the rural roads which are not able to support traffic other than residential travel.

**Question 18: Should site AB2 - Land south east of Junction 16 be considered for Green Belt release?**

No – we do not support the proposal to use the site for large warehouse units for distribution and logistics. Any change of use to this type of transport reliant industry contradicts SO-I,II, IV,VI, XI, XII. Limited character space so just a few below:

1. Grade 3 agricultural land – help should be given to local rural economy.
2. High risk of creep and go ... no clear defensible boundary.
3. Not evidence or justified with no other option?? - NPPF (21) para 140 and 141
4. Lanes used for quiet walking horseriding, cycling route
5. Undulated heathland habitat - broom etc accessed by ROW across the site = a different type of landscape to other parts of the parish.
6. Flood zone 2 and 3 natural brook in the middle.
7. It is in the top corner of the Parish and as green belt providing a natural buffer from M6 and A500.
8. Protects against air pollution, road noise, visual impact of the M6.
9. Increase poor air quality, noise, loss of habitat, ILLUMINATION 24/7/365 = negative visual impact.
10. Overall impact and loss of green belt would not be offset
11. Openness long views - Cheshire plains, Mow Cop, Jodrell Bank - impact on green belt adjacent.
12. Proposed access = pressure on A500/M6 roundabout. Layby well used stacked HGVs- halfway point on nationwide travel.
13. The village infrastructure would not support such a large increase of vehicles on the road – sole access would displace other traffic.
14. Parish Council continually raise increased traffic on Nantwich Road as cut through between major roads – see minutes.
15. No direct benefit to the Parish for the loss, disruption. noise, pollution, traffic through the

village, blight? (experienced elsewhere).

16. The rural service centre/cons area - congested by passing trade from site.
17. Jobs = low skilled low paid
18. Workers travel from outside the area – more car journeys.
19. No direct bus - Crewe, Alsager or Kidsgrove train stations only via Newcastle for connections.
20. The current bus service is subsidised by the Parish Council to keep it running due to lack of use and viability.
21. Alternative uses such as renewable energies/solar farms/carbon sequestration to meet SO-IV
22. Even with weight restrictions and signage, no guarantee HGVs etc would not travel via villages for access eg sat nav- single 60mph rural roads, no pavements.
23. Increase of HGVs on this section of M6 - Highways England ranked M6 2nd..“considerably more casualties involving HGVs occurred on the M6, M25 and M1 than any other road on the SRN”.

**Question 19 - Should site KL15 - Land to the south and east of new development site, Keele University be considered for Green Belt release?**

The Keele Science park is a natural progression which is close to town and has the infrastructure ready to support it. It is a high quality employment site which the Borough should be proud of – adjacent to the renowned Keele University which many of its businesses are linked back to the University.

**Section 12 Development Boundaries**

**Question 20 - Do you agree with the key principles of development boundaries?**

Yes – we need clarity on what is within a development boundary/village envelope and what is not – so there is no unplanned overspill to protect adjacent green field and green belt.

**Question 21- Do you think the development boundaries should be reviewed? If so, through the Local Plan or through Neighbourhood Plans?**

If they need to be reviewed this is best carried out through the Neighbourhood Plans where they exist. Otherwise leave them as they are.

**Section 13 Retail/Town Centre Regeneration**

**Question 22 - What would you like to see on your local high street?**

A variety of retail, leisure, restaurants, bars, but also live work units and independent retailers. There is no point competing with out of town retail parks, so the offer needs to be changed to bring it back to a market town. These should be encouraged and assisted to grow through reduction in business rates and other incentives. Build on other successful town centres such as Nantwich and Leek. Perhaps look to create a Town Council for Newcastle – to ensure the town is managed and protected through precept raised which can continue to invest solely into the town.

**Question 23 - What should the Local Plan do to enhance the vitality & vibrancy of the Borough's retail centres?**

As above create a Town Council for Newcastle – so that a body elected by the residents of the town can ensure it is carefully managed and receives the right sort of investment.

Create a Retailers Association to help all retailers to work together.

**Question 24 - Do you agree with the recommended changes to the town centre boundaries?**

Yes

**Question 25 - Is a Local Plan policy on air pollution required? If so, what should a policy on air pollution contain?** Absolutely – as it is already confirmed we have an issue with poor air quality, this would be made worse by the proposed increase in industry and employment sites proposed and 7000 minimum new homes. Walleys Quarry now impacts on the furthest parts of the Borough including Audley, this needs better control.

There should be proper resources allocated and thresholds to ensure that air pollution is monitored and addressed when it exceeds targets.

#### ***Section 14 Pollution, Water and Environmental Quality***

##### ***Question 26 – Is a Local Plan policy on water quality required? If so, what should a policy on water quality contain?***

Yes – ensure water quality is the highest standard possible and is monitored, with penalties if the standard is not achieved.

##### ***Question 27 – Is a Local Plan policy on environmental quality required? If so, what should a policy on environmental quality contain?***

Yes as above – this is crucial in view of the potential to remove green belt and green field, plus historic cases of land contamination due to unscrupulous landowners.

#### ***Section 15 Development Management Policies***

##### ***Question 28 - Do we need additional measures in the Local Plan to support national policies and guidance including the National Model Design Code on the design of development?***

Yes – developers need to have clear guidance to ensure the new housing is adaptable to the needs of future residents. It also should enhance and blend into its surroundings, reflecting important historical aspects.

Lifetime homes or today's equivalent should be required for all new housing.

Adequate off road and also on road.

High quality public realm and community spaces.

SUDs drainage systems.

Use of renewable energies and EV charging points for all types of buildings.

BREEAM excellence for buildings and unique developments using Passivhaus standards.

##### ***Question 29 - Do you agree that the Local Plan should set out identified areas for ecological recovery?***

Yes this is vital with climate change and other environmental factors such as flash flooding, high winds, long periods of dry and also wet weather etc.

##### ***Question 30 - Is a Local Plan policy on heritage required? If so, what should a policy on heritage contain?***

Yes a key focus should be enhancing and retaining our important historical assets. There are a lot of historical assets lost and unfortunately too much reliance placed on communities having the knowledge to designate them for the local list. More resources should be provided in this regard to ensure all assets are recorded and protected.

##### ***Question 31 - What are your perspectives on the policy approach advocated in the 2019 Strategic Flood Risk Assessment?***

Use of SUDs on new schemes

Upgraded drains to take water from the Highway.

There needs to be more done to ensure landowners manage their land better – so that water run off is kept to a minimum.

##### ***Question 32 - Do you agree that an open space policy should set out open space provision requirements in new development?***

There needs to be the ongoing maintenance implications for any open space creation to ensure it remains of value.

Consideration to creating social enterprises which support the ongoing maintenance of open spaces and boosts jobs.

##### ***Question 33 - Is a Local Plan policy on transport required? If so, what should a policy on transport contain?***

Encourage all car parks to have EV chargers.

Buses which are electric/green.

Better connections to train stations – eg Kidsgrove and Stoke – if necessary Crewe and Alsager.  
Bridleway and cycling routes should be encouraged – there is only one in the Parish currently.  
Parking standards – should be increased with thought given to more off road and communal car parks created to reduce the congestion on the narrow streets.

**Question 34 - What measures would you like to see in a Local Plan policy on renewable energy?**

Yes the policy options set out in the AECOM Climate Change Adaption and Mitigation Report 2020 should be included in the Local Plan.

A clear move away from industry that is high carbon producing and relies solely on the road network should be discouraged in this plan in order to aim for a zero carbon Britain by 2050. Logistics and distribution industries need to be built nearer to the mainline for the rail networks to enable them to move to using rail instead of road.

Yes - development over a certain size threshold (such as 10 dwellings) should be expected to provide a certain proportion of its energy consumption via renewable or low carbon technologies

Yes - the use of renewables should be aligned with any improvements to a building's fabric, known as the fabric first approach.

Solar farms are considered to be more appropriate than wind farms with the added value to wildlife in the areas between the solar panels.

**Question 35 - Are there any other topics that the Local Plan should address?**

No

**Question 36 - Are there any other matters you would like to make a comment on?**

Sadly a lot of people are unaware of the consultation, mainly due to a lot of people being unable to access the PC or even create a log on due to technical issues. AB2 should have been shown as a site map, given that the information is in the public domain, to allow people the opportunity to understand the context.

The document is too technical and complex.

**Question 37 - Do you have any files to upload?**

No