

AUDLEY RURAL PARISH COUNCIL

In the borough of Newcastle-under-Lyme, Staffordshire

Mr Martin Hamilton
Chief Executive
Newcastle under Lyme Borough Council
Via Email

Clerk - Mrs C Withington
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Dear Mr Hamilton

Review of New Housing Target for Local Plan

I am writing on behalf of Audley Rural Parish Council, the Audley Rural Neighbourhood Plan Steering Group and also local residents who have made representations to the Parish Council. The Parish Council are also aware of petitions which have been created regarding the same.

In light of the Secretary of State for Levelling Up, Housing & Communities' letter of 5th December 2022, and Neighbourhood Planning Policy Framework (NPPF) consultation document of 22nd December 2022, Newcastle under Lyme Borough Council, as the Local Planning Authority, are requested to review its targets for new housing in the Borough within the emerging Local Plan. This is to greater reflect the actual need (both in number and type of dwellings) and constraints locally, using the central Government formula as a nominal starting figure only. The housing target should inform a genuinely community led, green and regenerative Local Plan. In doing so, the review should take into consideration the Local Housing Needs Assessments, Design Codes, impact on the character of the areas and other local evidence that have been produced by recognised professionals which form part of the Borough's Neighbourhood Plans.

Proper consideration should be given to the emerging themes in the latest NPPF consultation, the planning constraints imposed by the Borough's Green Belt and the exceptional circumstances which exist in the Borough. This is particularly relevant with regards to Paragraph 142 which includes a new insertion that states that 'Green Belt boundaries are not required to be reviewed and altered if this would be the only means of meeting the objectively assessed need for housing over the plan period.' This approach requires a more realistic calculation of needs (a flexibility that is stated in paragraph 61 of the NPPF) given that the Standard Method is 'advisory' and 'a starting-point for establishing a housing. The exceptional circumstances include the following:

- The falling population of the Borough (a 0.5% drop from 2011 to 2021) suggests a lower household forecast.
- The constraint that a large percentage of the Borough's rural area that is in the Green Belt (approximately 50%).

- The number of new dwellings built in the Borough in excess of the targets in previous years (32% over the target from the 2018-19 year to the 2020-21 year) and the fact the housebuilding has exceeded the increase in households over the past 10 years in the Borough.
- The negative effect that largescale housing implied by central Government formula would have on the character of, and wildlife in, our rural areas.
- Also, the adverse impact that it could have on some rural parishes' Defra urban/rural classification.

The Parish Council and Steering Group look forward to receiving your response.

Yours sincerely



Mrs C Withington
Parish Clerk

cc – Cllr Tagg, Cllr Moffatt, Cllr Wilkes, Cllr Crisp