

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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7th June 2023

Dear Mr Hamilton

Review of New Housing Target for Local Plan – Stage 1 Official Complaint

I am writing on behalf of the Parish Council further to their letter dated 24th January 2023 and your subsequent response dated 16th May 2023. Both the Parish Council and Audley Rural Neighbourhood Plan Steering Group are disappointed with the response received, aside from the length of time it has taken to receive the same.

Your response sets out the Council's position with regards to consideration of the NPPF consultation, along with the next steps for consultation on the Local Plan and the apparent lack of 5 year housing land supply following the annual update (latest version published on the website is dated April 2021). However your response fails to address the main points of the Parish Council's letter who, as a plan making body, are trying to avoid disparities. The request was to review the housing target using 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 target. The exceptional circumstances include the following:

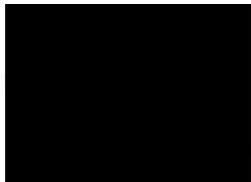
- The falling population of the Borough (a 0.5% drop from 2011 to 2021) suggests a lower household forecast.
- The constraint that a large percentage of the Borough's rural area that is in the Green Belt (approximately 50%).
- The number of new dwellings built in the Borough in excess of the targets 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 are also aware that the Petition of over 1500 signatures, delivered to you mid-March 2023, requesting the same is still yet to be formally received by the Council. Therefore as a result of the time taken to respond and what would seem to be a total disregard of the points made in the letter, the Parish Council requests that you treat this as a Stage 1 Official Complaint and respond accordingly.

With regards to the extended 8 week consultation period, planned to start from 19th June until 14th August over the summer holiday period, it is noted this is poor practice and could leave the Council open to challenge. It is considered to be at a period in time when consultees are less able to respond therefore may not be in accordance with the Gunning Principles.

The Parish Council looks forward to receiving your response.

Yours sincerely



Mr Nick Hayes
Chair of Audley Rural Parish Council
Chair of Audley Rural Parish Neighbourhood Steering Group

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