

13th June 2023



Mrs C Withington
Clerk, Audley Parish Council
The Croft
Barthomley Road
Audley
Staffs ST7 8HU

Castle House
Barracks Road
Newcastle-under-
Lyme
Staffordshire
ST5 1BL

By e-mail only: audleyparishcouncil@hotmail.co.uk

Dear Mrs Withington

Review of New Housing Target for Local Plan

I refer to your email and attached letter dated 7th June 2023.

I believe my previous letter sets out the position and since then, and as you will be aware the Cabinet for the Council on 6th June approved a report and the associated evidence base on a new (draft) Local Plan.

This is a Regulation 18 draft plan for consultation which precedes the Regulation 19 stage. The latter is the most crucial stage of the plan process as this is the plan that will be submitted to the Secretary of State and followed by an Examination in Public before final adoption by the Council.

In terms of your central request that we review the housing target, I will reiterate that I do not believe this to be necessary or appropriate at this stage - the target which we have set is in line with the current National Planning Policy Framework, and the indications from government that this aspect of the policy may change have no weight in the plan making process. If the National Planning Policy Framework is changed by government at any point ahead of submitting the Regulation 19 Draft Plan for inspection, we will have the opportunity to reflect on any changes that may arise and amend the Reg 19 plan accordingly, if appropriate.

Notwithstanding the fact that the National Planning Policy Framework may change, it is quite clear that under the current Framework we have shortage of housing sites, and there are no allocated sites, so we need to plan. The government's position regarding the amount of land to be allocated in a Local Plan may or may not change but a delay will lead to a greater shortfall and create bottleneck. This will only compound the issue.

Classification: NULBC **UNCLASSIFIED**

Additionally, the Local Plan is not just about housing numbers as its scope is much broader, including employment sites which are important to the local and wider economy.

On the matter of the consultation, The Cabinet have been very clear that they wanted an extended consultation period beyond the six-week period to eight weeks. In terms of the Gunning Principles to which you refer I offer the following comments:

- The Local Plan is still at early stage. No decisions have been made and will not until after the consultation period has ended and a Reg 19 plan is prepared.
- The Local Plan is supported by approximately 4,000 pages of evidence in 27 reports which are available, accessible, and interpretable to enable informed response from consultees. Comments can be made on the draft Local Plan by a number of means
- There is adequate time for consideration and response particularly as an extended period will be provided as referred to above. This is very much good practice
- All relevant comments once received will be analysed and considered before the final version of the plan is submitted to the Secretary of State

I reiterate that the Council is vulnerable to unplanned developments due to the lack of allocated sites. The Local Plan is also very much about protecting areas as well as identifying suitable sites. The land supply position will only get worse if the council does not act proactively to address the shortfall.

You have asked for your letter to be treated as a Stage 1 Complaint, which invokes a degree of formality. As such, there must be some formality in my response. My response is thus to apologise for the time taken to initially respond to your complaint but, for the avoidance of doubt, not to uphold your complaint.

You have asked that we review the housing target. I have explained why that is not appropriate at this time. Whilst you may be unhappy with this position, my previous correspondence set out the rationale for this position. We have taken a good deal of time and effort to arrive at a housing target which is credible in terms of the current situation, and we will revisit this if circumstances change. We are not prepared to revisit ahead of that time.

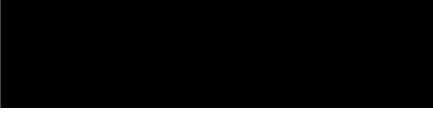
Ordinarily, at Stage 1, if you were not content with this response you would have been able to ask for a review at Stage 2 of the Complaints Process. However, there is no Officer senior to myself to whom this matter could be properly escalated, given that I have responded to you personally. You should, therefore, take this response as the Council's final response in this matter. That being the case, if you remain dissatisfied, you may wish to consider asking the Local Government and Social Care Ombudsman to consider the matter on your behalf. More details about that process can be found here:-

www.lgo.org.uk

Classification: NULBC **UNCLASSIFIED**

Classification: NULBC **UNCLASSIFIED**

Yours sincerely,



Martin Hamilton
Chief Executive

Martin.hamilton@newcastle-staffs.gov.uk

Classification: NULBC **UNCLASSIFIED**