

### **Question 1: Preferred Growth Option**

(see pages 7-9 of the consultation document)

**Do you agree with the preferred growth option for the Joint Local Plan?**

**No**

The targets do not adhere to the government projections or methodology, being aspirational rather than achievable.

### **Consultation Question 2:**

**Do you agree with the preferred strategic spatial option for the Joint Local Plan?**

**No**

The Parish Council will not support any development which would see an encroachment into the Green Belt of the Audley Parish or the Borough as a whole. Development within the Green Belt will change the openness and attractiveness of area and detract from its original purpose. It will lead to a merge of the distinctly separate villages (particularly within Audley Rural Parish). This will therefore harm the setting of the separate villages with distinctly separate historical identities and communities.

### **Consultation Question 3:**

**Do you agree with the preferred option of delivering an employment land supply of 230 hectares (2013-33) in order to provide quality, choice and flexibility?**

**No**

The Parish Council believes that people commute out of the area rather than within the borough/city and the emerging HS2 will support this further. There is an opportunity to use the surplus employment land as housing development and this should be explored further.

### **Consultation Question 4:**

**Do you agree with the preferred option of aiming to achieve the Employment Land Review (2015) recommendations for 25% of the employment land supply to be used for B1a/b uses and 75% for B1c/B2/B8 uses?**

**Overall: neither**

### **Consultation Question 5:**

**Do you agree with the preferred approach to promote new rural employment and enterprise through criteria based policy?**

**Overall: neither**

The Parish Council supports the need for rural opportunities for farming and other opportunities to support the local rural economy. Consideration to this aspect should form a part of the Joint Local Plan.

### **Consultation Questions 6 and 7:**

**Do you agree with the preferred option and spatial distribution for the supply of housing?**

**What would be your preferred approach to address the shortfall of housing and supports the vision and objectives of the Joint Local Plan?**

**No**

It would seem that the methodology used to create the projected housing targets for the Joint Local Plan does not follow the government's proposed national methodology. Therefore it is not possible to support this level of housing building. The Parish Council would not support any incursion into the Green Belt surrounding its historically distinct villages. It would seem to be appropriate to consider the areas which are assessed as making a "weak" contribution to the 5 Green Belt purposes, which are not currently included. As stated previously surplus land identified across the plan area (31 hectares) for employment use should be considered for housing/mixed use developments.

**Consultation Question 8:**

**Do you agree with the regeneration approach for Stoke-on-Trent City Centre (Hanley)?**

**No opinion**

**If not what changes would you make?**

**Consultation Question 9:**

**Do you agree with supporting mixed use development around Stoke-on-Trent Railway Station? If not what changes would you make?**

**No opinion**

**Do you agree with the revised definition of town centre boundaries for Stoke-on-Trent and Newcastle-under-Lyme?**

**Consultation Question 10:**

**Do you agree with the targeted Green Belt release at Keele to support the provision of a sustainable urban extension?**

**Neither**

The Parish Council does not wish to comment on this.

**Consultation Question 11:**

**Do you agree with the identification of this site for a housing - led mixed use regeneration scheme? (Berryhill)**

**Neither**

The Parish Council does not wish to comment on this.

**Consultation Question 12:**

**Do you agree with the approach to amend the Green Belt boundary in Newcastle-under-Lyme to support the delivery of employment and housing needs?**

**No**

The Parish Council values the current Green Belt as being integral to safeguarding the countryside from encroachment and should remain untouched. Other areas of land exist

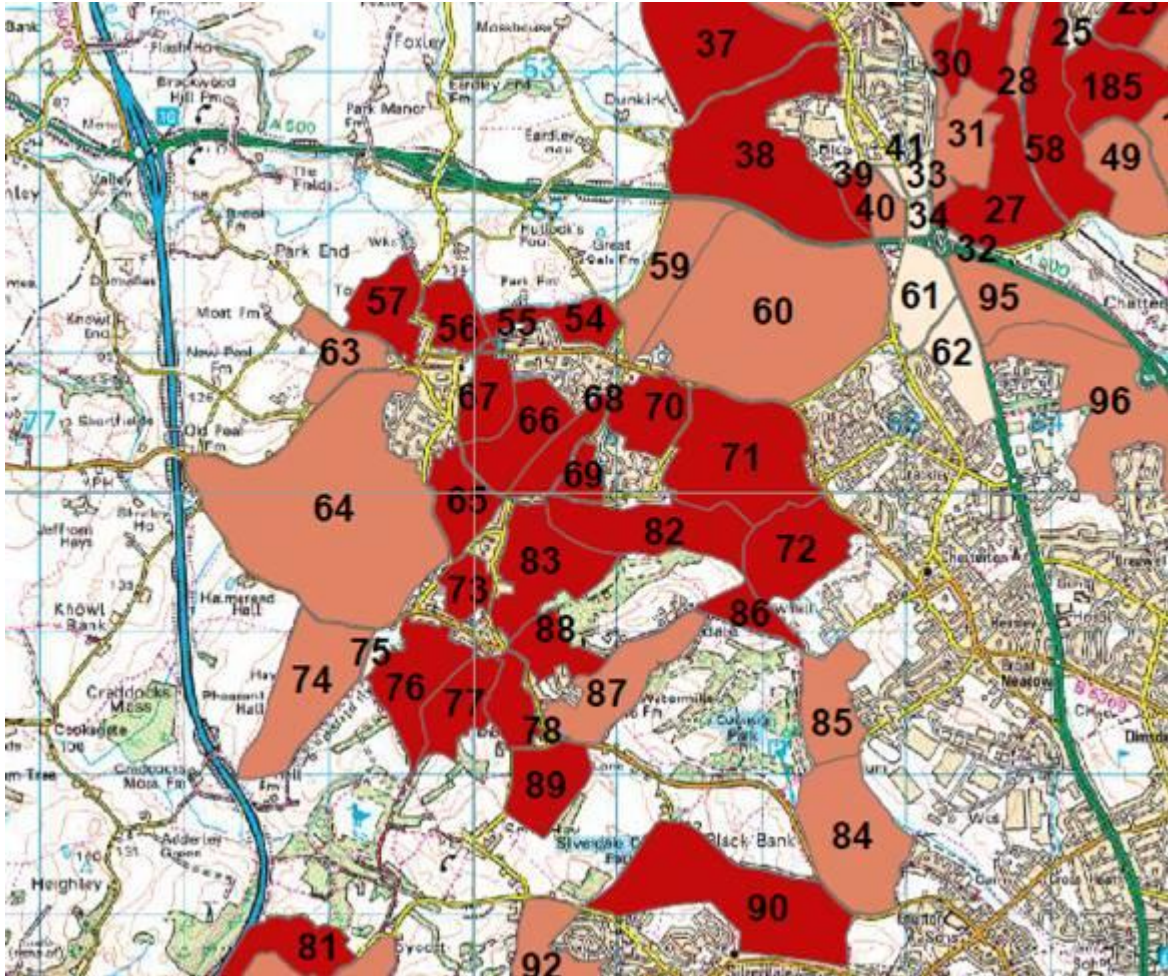
which are not Green Belt and could be recycled or could be changed from vacant employment use land to provide more mixed-use developments.

Audley Rural Parish is already the largest in the borough with 4,377 properties (Census 2011). The rural villages are already suffering from increased congestion caused by traffic rat runs, lack of parking in the housing estates and congested village centres and narrow estate roads, poorly maintained highway networks, poor broadband reduced bus services and reduced public sector services with oversubscribed schools. Therefore to add further pressure to these already congested village centres without investing in the bigger/wider picture will not create sustainable developments for the future. It is unlikely that any increase in property numbers, will attract further investment in public assets, public transport and other services to support this increase.

The Parish Council will not support any development which would see an encroachment into the Green Belt of the Audley Parish or the Borough as a whole. Development within the Green Belt will change the openness and attractiveness of area and detract for its original purpose. It will lead to a merge of the distinctly separate villages (particularly within Audley Rural Parish). This will therefore harm the setting of the retaining separate villages with separate historical identities and communities.

The Parish Council would not support the creation of further villages, although small minor developments (under 10 properties) to form extensions to the boundaries of existing villages may be possible – these are not likely to generate the numbers of housing needed to achieve the shortfall. There are already a number of ribbon developments in existence in the Parish, further development off the main through routes would add to these.

With regards to the Green Belt Assessment carried out which forms the evidence base for the JLP, the Parish Council would resist any changes to the Green belt status to keep it as it exists for Parcel Areas 59, 60, 63, 64, 74, 75, 87 – on the face of it these seem to be weighted towards some kind of development should the shortfall not be met. The Parish Council is concerned that there is no mention made of Diglake Colliery Site (home of the Diglake disaster) being a potential SSSI, which is a key consideration. It is also noted that the moderate areas do not contain any comments relating to the contribution they make to the settings of Listed Buildings nearby and known Archaeological areas of interest, offering them no protection. Consideration should be given to the priority status afforded to sites by Natural England with regards to their contribution towards habitats and species.



The Green Belt Assessment of Parcel 63 (Moderate Contribution) refers to it as being flat, however in reality it includes a hill and a disused quarry (referred to as Kent Hills) and Parcel 64 (Moderate Contribution) is also undulated. Developing 63, 64 and 74 will see an extension of the Audley village centre and put more strain on Audley facilities, which cannot currently support the large numbers of vehicles which use the narrow estate roads.

Parcel 75 (Weak Contribution) is next to the Bateswood Country Park (Local Nature Reserve – Natural England), being the home of the former Minnie Pit mine and open cast mining area although it was previously industrial development would lead traffic into Audley and put more strain on local schools and medical.

It should be noted there has been a recent large scale residential planning application (although not yet approved) through Cheshire East Council to further develop the former Gorsty Golf Club site, along Wychwood Village/Park at the western edge of Audley Rural Parish. Therefore any additional developments in this area may create see villages merged and the openness of the Parish's neighbouring Green Belt put at greater risk.

#### **Consultation Question 13:**

**Do you agree with this hierarchy of centres? If not what changes would you make?**

**Yes**

Although the priorities in terms of the Tier 4a Rural Service Centres do not seem to be shared priorities with other public sector services etc transport connections.

**Question 14: Centre Boundaries**

Yes

**Question 15: Key Strategic Sites for Retail and Leisure Provision within Centres**

(see page 38 of the consultation document)

**Do you agree with the list of strategic sites for retail and leisure provision?**

Yes although consideration needs to be given to the support of the out of town rural service centres

**Question 16: Out of Town Shopping**

(see page 39 of the consultation document)

**Do you agree with the approach to out of town shopping locations?**

Yes although consideration needs to be given to the support of the out of town rural service centres

**Question 17: Retail Impact Threshold**

(see page 40 of the consultation document)

**Do you agree with the impact thresholds for the different size of centres?**

No comment

**Question 18: Green and Open Space**

(see pages 42-43 of the consultation document)

**Do you agree with the preferred approach for managing the future provision of green and open spaces across the plan area?**

No

This approach does not seem to be shared by other public sector bodies in terms of the way they target their investment eg Staffordshire County Council in particular Rights of Way categorisation and if the plan is to be sustainable for the long term – priorities need to be shared across Local Authorities and public sector bodies.

**Question 19: Waste and Minerals**

(see page 44 of the consultation document)

**Do you agree with the preferred approach to safeguard important mineral resources within the City of Stoke-on-Trent?**

No comment

**Question 20: Character Areas**

(see page 47 of the consultation document)

**Do you consider that sub areas and character areas assist in identifying the sustainability of areas and in engaging communities?**

Yes - it falls in line with the Audley Rural parish boundary however there is no comment with regards to the other areas

**Additional remarks**