

**Town and Country Planning Act 1990
(As Amended)**

Audley Rural Neighbourhood Plan June
2024 – Regulation 16 Strategic
Representation

Representation

Document date: December 2024

On behalf of: Manor View Care Home Ltd

Ref: [REDACTED]

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1. INTRODUCTION

- 1.1 Knights act on behalf of Manor View Care Home Limited as planning agents in respect of their proposal to redevelop Land at New Farm, Cross Lane, Audley as a housing allocation. By way of background, this site has already been promoted through the Regulation 18 and 19 consultations of the emerging Local Plan 2020-2040 as well as the Council's Call for Sites exercise.
- 1.2 The site measures 2.6 hectares, it is located a short distance to the north of the settlement boundary of Audley and is washed over by the Green Belt. The site is shown in context on the adopted Policy Map in **Figure 1**.

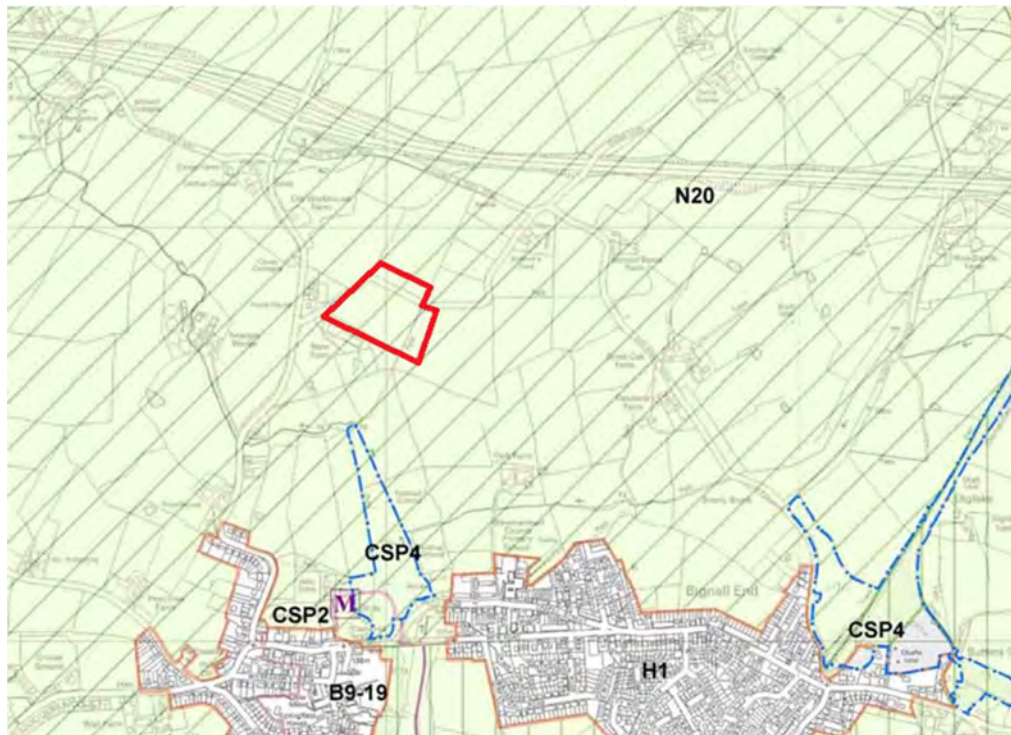


Figure 1 - Extract of adopted Local Plan Policy Map showing site (in red)

- 1.3 Planning permission was granted at appeal to replace a builder's yard with 7no. dwellings on 7 June 2019 (LPA ref. 18/00122/FUL and PINS reference APP/P3420/W/18/3219254). This development has been commenced. This site is located immediately to the west of the New Farm site. In allowing that appeal, the Planning Inspector considered that the site was a sustainable location for housing.
- 1.4 The site has also been subject to a planning application seeking to propose 39no. market family dwellings under LPA ref. 23/00522/FUL. This scheme was proposed as an enabling development to facilitate the conversion of the grade II listed Madeley Manor (previously approved to be converted to residential under LPA refs. 21/01175/FUL and 21/01176/LBC but which would be unviable if developed in isolation). This planning application was refused on 14 October 2024 against officer

recommendations. Members considered that very special circumstances did not exist to justify the harm to the Green Belt by reason of inappropriateness and loss of openness, and that the benefits of securing the future conservation of Madeley Manor were not outweighed by the disbenefits of the scheme. Our client intends to appeal this decision. A copy of the proposed layout plan is contained within **Appendix A**.

- 1.5 It is accepted that the redevelopment of this site for residential is unique, which under normal circumstances may not typically come forward. Notwithstanding this, it was not disputed by the LPA officers that the scheme would comprise a sustainable form of development that would be technically sound and would comprise a well-designed form of development.
- 1.6 It is acknowledged that the Regulation 19 Local Plan seeks to allocate several sites around the edge of Audley and Bignall End as residential allocations (and remove them from the Green Belt) which would provide a total of 270no. dwellings. Our client's site is not proposed to be taken out of the Green Belt as part of the draft Local Plan and it is therefore recommended that this site be allocated as a residential development.

2. COMMENTS ON PROPOSED POLICIES OF THE AUDLEY RURAL NEIGHBOURHOOD PLAN JUNE 2024

- 2.1 In light of the above Knights have the following comments on the proposed Neighbourhood Plan policies in respect of the land at New Farm, Audley.

Policy ANP1: 'Residential Development'

- 2.2 This policy seeks to focus new residential development within defined settlement boundaries, as well as infill developments within built up frontages which do not comprise inappropriate development in the Green Belt, and through the conversion of existing buildings.
- 2.3 It is requested that this policy be amended to acknowledge the guidance contained within the NPPF most notably the other scenarios where development is not inappropriate within the Green Belt or where there are very special circumstances exist to outweigh this harm. For instance, where proposals would constitute enabling development to secure the viable reuse of listed buildings not only within the parish but within the wider Borough (such as our client's site).
- 2.4 It is noted that the draft Audley Parish Neighbourhood Plan does not make any site allocations for new houses but notes that *"the lack of suitable sites implies a shortfall of around 149 dwellings over the Neighbourhood Plan period"*. The draft plan also acknowledges that the majority of housing in the parish are 2 and 3 bedroom dwellings and that (amongst other housing needs) there is a need for 4 or more bedroom family homes to provide a greater choice.

2.5 The new NPPF (published on 12 December 2024) now requires Newcastle-under-Lyme Borough Council to deliver a substantially higher number of houses per year as the Government seeks to deliver on their target of providing 1.5 million new homes over this parliamentary period. Acknowledging the opportunities to deliver new housing in sustainable locations (albeit outside of existing settlement boundaries) will help the Borough Council meet these increased housing targets and would lessen the pressure to approve new housing in less sustainable locations and on sites which contribute more greatly to the purposed of including land within the Green Belt.

2.6 It is therefore recommended that Audley be recognised as a Rural Centre that can deliver greater growth than currently proposed. Importantly, paragraph 144 of the recently published NPPF states that:

*“When drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of development should be taken into account. **Strategic policymaking authorities should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary.** Where it has been concluded that it is necessary to release Green Belt land for development, plans should give first consideration to previously-developed land in sustainable locations, then consider **grey belt land in sustainable locations which is not already previously-developed, and only then consider other sustainable Green Belt locations.** They should also set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land.”* [Knights’ emphasis]

2.7 The site is considered to fall within the definition of ‘Grey Belt’ (as set out in Annex A of the NPPF) which states that:

*“Grey belt: For the purposes of plan-making and decision-making, ‘grey belt’ is defined as land in the green belt comprising Previously Developed Land **and any other parcels and/or areas of Green Belt land that make a limited contribution to the five Green Belt purposes** (as defined in para 140 of this Framework), but excluding those areas or assets of particular importance listed in footnote 7 of this Framework (other than land designated as Green Belt).”* [Knights’ emphasis]

2.8 Aside from its Green Belt designation, the site is not located within any of the excluding areas listed in footnote 7. Furthermore, the previous appeal for the 7no. dwellings adjacent to the site (LPA ref. 18/00122/FUL) confirmed that the site was indeed a sustainable location for new residential development.

2.9 Paragraph 155 of the NPPF goes on to state that:

“Where major development takes place on land which has been released from the Green Belt through plan preparation or review, or on sites in the Green Belt permitted through development management, the following contributions should be made:

- a. In the case of schemes involving the provision of housing, at least 50% affordable housing [with an appropriate proportion being Social Rent], subject to viability;*
- b. Necessary improvements to local or national infrastructure; and*
- c. The provision of new, or improvements to existing, green spaces that are accessible to the public. Where residential development is involved, the objective should be for new residents to be able to access good quality green spaces within a short walk of their home, whether through onsite provision or through access to offsite spaces.”*

- 2.10 The current planning application includes a viability report that demonstrates that it would be unviable to deliver affordable housing on this site (given that the minimum amount of development has been proposed to enable the redevelopment of Madeley Manor Farm). Nevertheless, our client owns further land around this site which could be considered to also comprise Grey Land and may well be able to provide affordable housing provision as part of a Phase 2 scheme.

Policy ANP2 ‘Business and Community Facilities’

- 2.11 It is also important to recognise that the emerging Local Plan seeks to allocate 22 hectares of land adjacent to Junction 16 of the M6 (Policy AB2) to provide 220,000sqm of employment land. This development is likely to have multiple benefits to the Parish of Audley and bring forward inward investment into the villages particularly with senior management professionals seeking to live locally within high quality housing stock. The draft Neighbourhood Plan acknowledges that there is an undersupply of large family housing within the parish, and the New Farm, Audley development would contribute significantly towards meeting this demand (given its close proximity).
- 2.12 Draft Policy ANP2 makes no reference to this proposed allocation, and the significance of that proposal should not be underplayed within the Neighbourhood plan given the potential direct and indirect investment that will come forward when that development is up and running.

3. SUMMARY

- 3.1 It is considered that our client's site at New Farm, Audley can deliver high-quality housing in a sustainable location within Audley Parish. It has been established in the Economic Benefits Statement that was produced by Pegasus Group in support of planning application 23/00522/FUL that such a scheme could bring forward substantial benefits to Audley and the Borough as a whole and would also facilitate the redevelopment of Madeley Manor to enable it to be conserved and put to a viable use consistent with its conservation for the foreseeable future.
- 3.2 This site is also considered to comprise a Grey Belt site (as defined in the NPPF) on the basis that makes a limited contribution towards the five Green Belt purposes, and would provide a suitable site to help the Borough Council deliver on the increase housing targets that the Government is seeking to deliver.

██████████

Knights

DECEMBER 2024

**APPENDIX A - LAYOUT PLAN SHOWING PROPOSED DEVELOPMENT AT NEW FARM
SITE AS PROPOSED IN 23/00522/FUL**

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drawing
1190-103 G

revision

client
MANOR VIEW CAREHOME LTD.

project
RESIDENTIAL DEVELOPMENT

location
NEW FARM,
CROSS LANE,
AUDLEY, ST7 8JQ

title
SITE ROOF PLAN AS PROPOSED

issue
PLANNING

scale
1:500 @ A1

drawn by
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