

Audley Rural Parish Council Written Statement
Matter 3 Green Belt
Town and Country Planning Act 1990
Planning and Compulsory Purchase Act 2004
Newcastle-Under-Lyme Local Plan Inquiry
Site AB2 (A500)

1. Introduction

1. This is a statement by regulation 19 respondent's Audley Rural Parish Council [and Audley Community Action Group (also known as PAPG)], responding to Matter 3 Green Belt. The statement is structured around answers to the Matter 3 questions, followed by supporting analysis.
2. The Parish Council objects to the release of site AB2 from the Green Belt. The focus of matter 3 appears to be the release of housing land from the Green Belt. However, there is no other matter that deals with Green Belt release and so the Parish Council set out here its concerns relating to the proposed Green Belt release for site AB2 as an employment site. In summary, the approach and evidence base put forward by the LPA to support to the local plan does not provide sufficient justification for the release of this site.

2. Matter 3 Questions

3.1 What proportion of new housing allocated in the Plan would be on land currently designated as Green Belt?

3. Green belt release is also proposed for employment site AB2 (80 hectares).

3.2 Paragraph 141 of the NPPF identifies that before exceptional circumstances exist to justify changes to Green Belt boundaries a strategic policy making authority should be able to demonstrate that it has fully examined all other reasonable options for meeting its identified need for housing. Taking into account the answers to question 1.2 have all opportunities to maximise the capacity on non-Green Belt land been taken? How has this been assessed and is this robust?

In particular:

- **How has the Council sought to make as much use as possible of suitable brownfield sites and underutilised land?**
 - **How has the Council sought to optimise the density of development?**
4. It is unclear why so much employment land has been proposed, in particular green belt release of 80 ha for Site AB2. The Newcastle-under-Lyme Housing and Economic Needs Assessment (Turley, 2023 and 2024 update) identifies a need minimum of 63ha of employment land over the local plan period 2020–2040.
 5. The area of site area of AB2 for employment development varies in different reports and within the Local Plan itself. The entire site is allocated, but the policy refers to 22ha. There is a lack of clarity. The full site would mean that just over 119ha of employment land would be allocated [see ED039].
 6. The aim of allocating such a large site appears to be to address sub-regional need, though this appears not to have been quantified. Cheshire East Council did not support the site allocation seeking to remove it and Stoke-on-Trent City Council

do not support the site for logistics/warehousing. There has been no request from neighbouring authorities to accommodate any unmet need for employment land. There does not appear to be any robust analysis of other sites, including brownfield sites in the wider sub-region. The analysis and evidence to support green belt release to cater for wider sub-regional need is very clearly insufficient. In order to justify Green Belt release for this purpose the LPA are required to demonstrate that the decision “has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development”. There is nothing in the evidence base before the examination which sufficiently demonstrates this has been undertaken. Nor is there an analysis which demonstrates why site AB2, a Green Belt site, is the appropriate location for an employment site to meet a sub-regional need.

7. Little weight has been given to Green Belt purposes, including ‘safeguarding the countryside from encroachment’ and assisting in ‘urban regeneration, by encouraging the recycling of derelict and other urban land’. The evidence regarding Green Belt release contains contradictions, which will be discussed in more detail later in this statement.
8. The Green Belt purpose relating to regeneration is of fundamental importance for the North Staffordshire conurbation, given the challenges in securing investment and development for brownfield sites. Allocation of a large site in the open countryside would clearly undermine regeneration in the urban area. There is no coherence to an employment strategy that undermines regeneration in the wider sub-region.
9. It is difficult to see how the proposed allocation of Site AB2 meets the requirement for soundness, including that plans should provide a positive strategy, taking account of unmet need from neighbouring areas. The allocation of site AB2 and associated Green Belt release has not been justified and is unsupported by evidence. It is contrary to national policy relating to employment and Green Belts. The Plan is unsound with the allocation of site AB2. This could be avoided by removing the proposed site allocation.

3.3 Are there exceptional circumstances to alter the Green Belt in the Borough in principle? If so what are they? If not, how do you consider housing and employment needs could be met?

10. There are clearly no exceptional circumstances to justify the release of the 80ha site. It is not even clear how much of the site is proposed for employment or what is proposed for the remaining parts of the site (the majority of the site area). The site is in an unsustainable location.
11. We note that ‘Indurant’ has been consulting separately on a draft masterplan for site AB2, showing a variety of employment uses across the entire site.

12. The Green Belt release appears to seek to address wider sub-regional need, but without taking proper account of the negative economic consequences of Green Belt release in terms of assisting 'in urban regeneration, by encouraging the recycling of derelict and other urban land'. This is an issue of particular relevance in North Staffordshire, given the problems of derelict brownfield sites.
13. The release of land in the open countryside would have high negative economic and environmental impacts. The infrastructure challenges have not been properly addressed, so bring into question the deliverability of the site. Both of these issues are discussed in more detail later in this statement.
14. The most exceptional circumstance in North Staffordshire relates to the particular importance of the Green Belt purpose relating to urban regeneration.
15. In addition, there are concerns about the type and quality of jobs likely to be created on AB2, particularly large-scale logistics. Stakeholders have called for higher-quality, well-paid jobs and expressed scepticism about job longevity due to automation. Sacrificing Green Belt is not justified for potentially lower-wage, less secure jobs, or jobs susceptible to automation, rather than focusing on attracting higher-value sectors to suitable locations. Site AB2 is specifically targeted at occupiers looking at an M6 Corridor location to service a wider geographical area and not primarily for locally based businesses.
16. Far from there being exceptional circumstances, the release of site AB2 is not supported by evidence and fails to take proper account of national policy, in particular that relating to employment and Green Belts. The Plan has not been positively prepared and fails to properly consider wider impacts.

3.4 The Council has produced a Green Belt Assessment (ED8, 8a, 8b, 8c). Is the Council's approach to assessing Green Belt appropriate? What are your reasons for this view?

3.5 Has the Green Belt Assessment adequately assessed the suitability of individual sites and their contribution towards the purposes of including land in the Green Belt? Are there any omissions in the policy?

17. The Green Belt assessment is incoherent insofar as it relates to site AB2 (this is discussed in more detail later in this statement). It is based on contradictory evidence and has failed to take account of the Green Belt purposes relating to assisting 'in safeguarding the countryside from encroachment' and assisting 'in urban regeneration, by encouraging the recycling of derelict and other urban land'. The allocation of Site AB2 fails to properly consider national policy on employment and Green Belts and is not supported by evidence or adequate analysis.

3.6 How has the Green Belt Assessment informed and been informed by the spatial strategy? How is it affected by other constraints?

18. There is no coherence to an employment strategy that undermines regeneration in the wider sub-region. Site AB2 appears to be intended to address wider sub-regional need, but fails to properly consider wider economic impacts on the North Staffordshire urban conurbation.

3.7 Has the Green Belt Assessment adequately addressed the cumulative effects of Green Belt release?

19. There are contradictions in the evidence relating to Site AB2. There has not been adequate or coherent consideration of the implications of the site allocation in terms Green Belt purposes. The Plan has failed to properly apply national policy relating to Green Belts. Exceptional circumstances have not been demonstrated.

3. Site AB2 and Employment Land Green Belt release

20. In the absence of any specific questions on the principle of Green Belt release for employment land we set out here our objection to the release of site AB2 from the Green Belt. The Inspector may wish to consider whether further MIQs are necessary to address employment land release in the Green Belt. At the hearing sessions PAPG will seek to make our representations at the most appropriate time.

a. Evidence Base

21. Various Reports have informed the Local Plan's proposed site allocations and associated Green Belt release. These very clearly do not support the allocation of site AB2, except for one report which contains a very fundamental inaccuracy.
22. The Strategic Housing & Employment Land Availability Assessment (SHELAA), Report September 2022 Appendix 4 (Sites not in Deliverable & Developable Supply) included Site AB2. The AB2 site assessment proforma recognised that the site was in the Green Belt and was isolated, disconnected from Audley and Bignall End, partly affected by flood zones, with access limitations and with poor access to a range of services and facilities. The site appears to be missing from the 2024 update report, which is a matter of considerable concern. There is a clear inconsistency between NUL Borough Council's position in September 2022 and the present. A site identified as not deliverable or developable is now suggested for allocation.
23. The Green Belt Site Review Consolidated Report 16th July 2024 recommends exclusion of the AB2 site from the process (Table 17, page 28).

24. The Urban Vision Enterprise CIC Audley Parish Green Belt Review, V2.4, August 2022, commissioned by Staffordshire County Council, found that the site made a strong contribution to Green Belt purposes, including safeguarding the countryside from encroachment and regeneration of urban land.
25. The Strategic Employment Site Assessment Report, April 2023 (updated 2024), prepared by Aspinall Verdi, puts forward the case for 'exceptional circumstances'. The report states that:

'The land at Junction 16 was not assessed as part of Arup's Green Belt Report. As such, we believe it makes a weak contribution to Green Belt purposes'.
26. This is inaccurate. The ARUP Green Belt Assessment Part 2 Study Full report did consider the site against Green Belt purposes and found that it made a moderate contribution. In terms of safeguarding the countryside from encroachment, it made a 'strong' contribution. The Urban Vision Enterprise CIC Audley Parish Green Belt Review had similar findings.
27. This contradiction demonstrates that the Green Belt impact has not been properly assessed or understood. The contradiction was brought to the Borough Council's attention, yet the site is still proposed to be allocated on the basis of the Aspinall Verdi report. This is clearly indefensible.
28. The site allocation does not meet any of the NPPF's tests for soundness.

b. Sustainability Appraisal

29. The updated Sustainability Appraisal July 2024 highlights adverse impacts of developing the site AB2. Paragraph D.5.2.11 states "The introduction of new large-scale developments has potential to be discordant with the landscape features of the associated character areas as identified in the LSCA34, especially given the location of Sites AB2 and KL15 within areas of 'high' sensitivity to development ...".
30. The Table on page N37 identifies that site AB2 would have major negative impacts on: 'Natural Resources and Waste', 'Flooding' and also 'Landscape'. Minor negative impacts include: Air, Biodiversity, Flora and Fauna, Water, Health and Wellbeing and Transport and Accessibility. There is only one other site that scores so negatively, and this was not taken forward.
31. Positive impacts were identified for 'Climate Change' and 'Economy'. However, it is difficult to see how the development of a site remote from the urban conurbation, involving the loss of agricultural land and relying on road-based travel, could contribute positively against climate change. In addition, the harm to the rural economy and to economic and physical regeneration in the urban conurbation appears to have been ignored.

32. Tables N10 and N11 include growth strategy options. Option 6D does not include site AB2 and delivers better scores/outcomes.
33. The proposed allocation of Site AB2 is clearly unsustainable and would result in substantial social, economic and environmental harm.

c. Harm to Green Belt Purposes

34. Paragraph 143 of the National Planning Policy Framework states:

Green Belt serves five purposes:

- a. to check the unrestricted sprawl of large built-up areas;
 - b. to prevent neighbouring towns merging into one another;
 - c. to assist in safeguarding the countryside from encroachment;
 - d. to preserve the setting and special character of historic towns; and
 - e. to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.
35. Removal of the site(s) from the Green Belt would undermine purposes c. and e. in particular, by allowing major incursion and encroachment into the countryside and undermining of regeneration of the North Staffordshire urban conurbation by developing greenfield land in the countryside.
 36. The allocation of Site AB2 appears to be based on current market conditions, rather than robust evidence of future, long-term demand sufficient to justify Green Belt release.
 37. There are demonstrable problems of decline and dereliction within Newcastle-under-Lyme and Stoke-on-Trent. There are clear viability challenges in regenerating the urban areas in North Staffordshire. These have not been properly taken into account in the proposed allocation of site AB2.

d. Harm to Economy/Employment

38. The economic impact on the North Staffordshire conurbation would be negative, due to:
- the remoteness of the site from the urban conurbation;
 - the impact on the viability of brownfield sites, undermining the regeneration of the urban conurbation;
 - harm to the rural economy, due to loss of the best and most versatile agricultural land and associated harm to local food growing capacity and agricultural employment;
 - the focus on potentially lower-wage, less secure jobs, or jobs susceptible to automation, rather than focusing on attracting higher-value sectors to suitable locations.
39. Chapter 6 of the NPPF deals with supporting a prosperous rural economy. It is clear that these paragraphs have been ignored in the allocation of Policy AB2. The site allocation takes no account of the rural nature of the area or the needs of rural and local businesses. There is no attempt to link to local settlements or the local economy or sustainable transport routes.
40. Allocation of the site is not justified by the Economic Needs Assessment Newcastle-under-Lyme & Stoke-on-Trent June 2020 which stated, 'overall need implied under any of the aforementioned scenarios could be met through the current supply of circa 293ha of employment land'. This highlights how allocation of site AB2 would undermine regeneration elsewhere.
41. There are existing employment and logistics sites with capacity. There is no need to enable employment development in the open countryside.

e. Harm to Environment

42. The development would introduce a major urban employment site within a rural parish, remote from local services, and adversely impacting on Audley's villages, rural environment and rural economy.
43. The Newcastle-under-Lyme Landscape & Visual Appraisal March 2023 identified development of the site as having a major adverse impact. Mitigation measures would not be effective given the scale of development.
44. The Audley Rural Civil Parish Natural Capital Assessment report (Staffordshire Wildlife Trust, June 2024) identified ecological and wildlife features within the site, including a high distinctiveness wildlife corridor and Strategic Significance Areas within the Nature Recovery Network.

45. The development of site AB2 would be unsustainable and environmentally harmful, due to:

- development of greenfield land in an unsustainable location, remote from the existing urban conurbation;
- harm to landscape and rural character and habitats, including impacts on rural lanes where they would need to be widened, including destruction of adjoining landscapes;
- a range of significant adverse impacts (visual, noise, light, disturbance, air quality);
- Uncertainty over the cost and deliverability of measures to mitigate a range of impacts, including flood risk, noise, and heritage impacts.

f. Transport

46. There is inadequate and insufficient transport data and analysis. The impact on local roads has been acknowledged, but with no proper analysis. There are clear concerns over impacts on the A500 and M6 junctions (including those expressed by National Highways), but without such concerns being properly addressed.

47. The traffic impacts would be negative, including:

- generation of road-based traffic, due to complete reliance on car-based transport and lack of sustainable transport alternatives;
- traffic impacts and on key junctions, including on the A500 and M6 (parts of the A500 already have severe traffic capacity and congestion issues);
- harm to the rural character of the area from highway works;
- Impacts on the amenity and safety of rural roads and lanes.

48. Transport/highway mitigation (especially at M6 Junction 16 and the A500) required for AB2 are likely to be complex and costly, and their effectiveness or deliverability are uncertain. National Highways notes additional delays on the A500 will occur and require further mitigation. The required works on the strategic road network are significant.

49. It is difficult to see how the site could be allocated without proper and thorough data and analysis. It would be reckless to assume that severe traffic problems could be mitigated at the planning application stage.

4. Summary

50. Allocation of site AB2 is not supported by the various assessments (though the site has been deleted from updates of some of those assessments). Allocation of the site is inconsistent with national policy and guidance. It would cause

substantial social, economic and environmental harm to the Parish, the Borough and the wider North Staffordshire urban conurbation.

51. The planned level of growth would accelerate problems of urban decay, especially in Stoke-on-Trent, by exacerbating viability challenges. There is no economic or social case for the numbers involved.
52. There are very clear problems in terms of all of the tests for soundness, for the reasons stated.