

**Audley Rural Parish Council Written Statement
Matter 9 Employment
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 9 Employment. The statement is structured around answers to the Matter 9 questions, followed by supporting analysis.
2. The overarching position of the Parish Council is that we object to the development allocation of the Land at Junction 16 of the M6 site under Policy AB2 ('Policy AB2').

2. Response to Examiner Questions

Issue 9 - Are the provisions of the Plan in relation to the provision of employment land justified and consistent with national policy? Would the allocations be developable, deliverable and otherwise soundly based?

3. While this is not a specific question but instead the Issue 9 it will assist the Examiners for us to set out our overarching response (which will be expanded upon in the specific questions below). The proposed allocation of Site AB2 would be inconsistent with national policy. The site allocation and green belt release is not supported by proper analysis and evidence, is clearly not consistent with national policy and does not meet any of the National Planning Policy Framework's requirements in terms of soundness. The only way to make the Plan 'Sound' would therefore be to modify the Plan to remove AB2.

9.1 How much employment land is allocated in the Plan? How have "local" and "strategic" employment needs been identified and quantified and how does the Plan seek to address these?

9.2 Is the identified supply of local employment land justified in order to provide for future employment needs in the borough?

9.3 In relation to strategic employment needs is the amount of land allocated for strategic employment needs justified and consistent with national policy?

9.4 Have these allocations had appropriate regard to the potential wider strategic impact of the development?

4. 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. However, there are several uncertainties with the approach the Local Plan has taken to employment land.
6. The supporting evidence base – the Housing and Economic Needs Assessment 2025 (ED001) – concludes there is a need of between 43.1 and 83.0ha. However it is also noted that there is a current – albeit reducing – supply of

48.9ha. It is currently unclear from those figures how the 63ha figure has been derived and what justification it carries. This is relevant to soundness because if a policy is not based on proportionate evidence then it will be unjustified.

7. It is then unclear how much of the 63ha figure is to meet 'local' need and 'strategic' need. This is compounded paragraph 3 of PSD1 which notes that two allocations (including AB2) will be 'strategic' employment sites but also provide a resilient supply of employment land suggesting (as is then confirmed by 5.3 of the supporting text) that it will be for both local and strategic need.
8. This unclarity is then compounded by the way in which AB2 is treated in the specific allocation policy. The 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 119 ha of employment land would be allocated. The Turley report identifies that only 30% of employment created by AB2 would be for people living in the Borough. Allocation of the site is clearly not about meeting local need.
9. 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 insufficient.
10. There are also concerns about the type and quality of jobs likely to be created on sites like 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.
11. Reports emphasise that sites like AB2 are specifically targeted at occupiers looking at an M6 Corridor location to service a wider geographical area and not primarily for locally based businesses.
12. The size of the site suggests that it aims to meet sub-regional needs in part. But there is no coherence to an employment strategy that undermines regeneration in the wider sub-region. It is difficult to see how this meets the requirement for Plans to provide a positive strategy, taking account of unmet need from neighbouring areas.

13. This is particularly critical because it AB2 is proposed to be removed from the Green Belt and therefore the Examiners must be satisfied that there are 'exceptional circumstances' which are fully evidenced and justified (per paragraph 145 of the NPPF). In this case it seems to be that the removal of a significant area of Green Belt is being justified on meeting an economic employment need. But the Plan is unclear as to whether this is to meet a local or strategic need and has failed to point to any evidence to support that on either basis the release would be justified by exceptional circumstances.
14. If the justification is local then – on the Council's own evidence – there is sufficient employment land (existing and other allocations) to meet their predicted need without reliance on AB2.
15. If the justification is strategic – then where is the evidence that said strategic need (whatever it is) can only be met by the release of green belt in this local authority area rather than the development of non-green belt land elsewhere. All of this is missing which means that the exceptional circumstances has not been established and so the allocation is not consistent with national policy nor has not been justified or properly evidenced. The Plan is unsound with the allocation of site AB2.

9.5 How were employment sites selected? What factors led to their allocation? Are they based on up-to-date evidence? Were they selected in comparison with possible alternatives using a robust and objective process?

16. The analysis and evidence base does not support the allocation of site AB2.
17. 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.
18. 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. **This appendix has been incorrectly titled and is referred to as Appendix 3 in the Sept 2022 report*
19. The Green Belt Site Review Consolidated Report 16th July 2024 recommends exclusion of the AB2 site from the process (Table 17, page 28).

20. The Urban Vision Enterprise CIC Audley Parish Green Belt Review, V2.4, August 2022, commissioned by Staffordshire County Council, had similar conclusions and found that the site made a strong contribution to green belt purposes, including safeguarding the countryside from encroachment and regeneration of urban land.
21. 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:
22. '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'.
23. 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.
24. 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. This is clearly indefensible. The site allocation does not meet any of the NPPF's tests for soundness.

9.6 Are the sites allocated for employment sound, and in particular for each of the sites listed below:

- a) Are the various requirements set out in the policy clear, justified and effective?
- b) Have the site constraints been appropriately taken into account in the allocation of the site?
- c) Are floorspace assumptions soundly based and have site constraints and off-site impacts been adequately addressed?
- d) Is there robust evidence that the assumptions regarding the infrastructure required for the development are realistic and that it will be deliverable?
- e) Is there evidence that the development of the allocation is viable and developable during the plan period?
- f) Are there any omissions in the policy, and is it sufficiently flexible? Where applicable, are the main modifications suggested to the Policy necessary to make the Plan sound?

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25. The policy is unclear, including the area of the site available for employment development and, if only 22 ha is available, what uses are proposed for the remaining 58 ha, to justify exceptional circumstances for green belt release.

26. We note that 'Indurent' has been consulting separately on a draft masterplan for site AB2, showing a variety of employment uses across the entire site.
27. 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 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.
28. With specific regards to **Question 9.6c** and the off-site impacts of the site allocation, the transport/infrastructure constraints and wider economic and environmental impacts have not been properly considered or addressed. The transport evidence is clearly inadequate. Both of these issues are addressed in more detail later in this report.
29. 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.
30. 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.
31. 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.
32. The economic impact on the North Staffordshire conurbation would be negative, due to:
 - the remoteness of the site from the urban conurbation;
 - the negative impact on the regeneration 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;

- potentially lower-wage, less secure jobs, or jobs susceptible to automation, rather than focusing on attracting higher-value sectors to suitable locations.
33. Chapter 6 of the NPPF deals with supporting a prosperous rural economy. It is clear that this has 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.
 34. 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.
 35. As previously demonstrated, there is no need to enable employment development in the open countryside. The allocation of Site AB2 and associated green belt release fails to take proper account of national policy. The negative impacts on wider regeneration have not been considered, so the Plan has not been positively prepared.
 36. As already stated, there is inadequate evidence and justification for the allocation of site AB2. The Plan is unsound with the site included. It has not been positively prepared, is not supported by adequate or coherent evidence or analysis, fails to have regard to national policy, and there are questions over deliverability, which will be discussed in more detail later in this statement.

9.7 Are the requirements of policies EMP1, EMP2 and EMP3 clear, and would the criteria identified to assess proposals on these sites be likely to be effective? In particular:

- a) How would existing employment sites be identified?
- b) Would the agent of change principle expressed within EMP2 adequately address the requirements of existing businesses?
- c) Are there any omissions in the policies and are they sufficiently flexible?

37. Policy EMP1 refers to local needs, but allocation of Site AB2 appears to be to be aimed at meeting sub-regional need, but there is a lack of clarity over this, as stated previously.

9.8 Taken together, does the Plan provide for an appropriate amount and range of employment sites to meet the needs of the Borough for the Plan period?

38. Site AB2 appears to be to be aimed at meeting sub-regional need, but there is a lack of clarity over this, as stated previously.

3. Summary

39. 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. This is critical because AB2 is proposed to be released from Green Belt to support its allocation and this bring with it the stringent requirement of exceptional circumstances. It would cause substantial social, economic and environmental harm to the Parish, the Borough and the wider North Staffordshire urban conurbation.
40. 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.
41. There are very clear problems in terms of all of the tests for soundness, for the reasons stated.