

Consultation Statement June 2024

Neighbourhood Planning Regulations 2012 (Part 5 s15)

To: Newcastle under Lyme Borough Council Local Planning Authority)
By: Audley Rural Parish Council (Qualifying Body)
Neighbourhood Development Plan Title: Audley Rural Neighbourhood Plan
This application relates to the following parish: Audley Rural Parish Council

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1. Introduction

This Consultation Statement accompanies the submission of the Audley Neighbourhood Development Plan (2022-2042). It summarises the community engagement programme and the Regulation 14 consultation. This Consultation Statement has been prepared to fulfil the legal obligations of the Neighbourhood Planning Regulations 2012. Section 15(2) of Part 5 of the Regulations sets out what a Consultation Statement should contain:

- (a) contains details of the persons and bodies who were consulted about the proposed neighbourhood development plan;
- (b) explains how they were consulted;
- (c) summarises the main issues and concerns raised by the persons consulted;
- (d) describes how these issues and concerns have been considered and, where relevant, addressed in the proposed neighbourhood development plan.

Consultation was undertaken by Audley Rural Parish Council delegated to Audley Rural Neighbourhood Plan Steering Group and its consultants, Urban Vision Enterprise. Consultation events took place at the following stages in the neighbourhood planning process:

- initial consultation events were held in July 2021 and Sept 2021 at the very start of the process;
- a second consultation in April 2022 around the household and business survey
- a third round consultation events in October 2022 for the Local Green Spaces consultation
- the statutory consultation stage in accordance with Regulation 14 from 16th October 2023 to 27th November 2023.

This Consultation Statement provides an overview of each of the above stages of consultation in accordance with Section 15(2) of Part 5 of the Regulations.

2. Summary of Community Engagement

2.1 Approach to community engagement

A much greater level of consultation has been undertaken than the legislation requires as shown below in the detail contained in the following sections of this statement. Neighbourhood Planning1 allows communities to have a greater say over the development in their area. It is important that Audley Neighbourhood Plan represents local people's views and needs.

The consultation process sets out how we tried to reach all members of the community. It was important to encourage community participation throughout all stages of the process.

We have outlined below how we engaged with the local community (including residents, businesses, schools etc.) to make sure they were involved in developing and agreeing the final Plan. The aims of the Audley Rural Neighbourhood Plan consultation process were:

- making every effort to ensure everyone has the opportunity to express their views and suggestions
- provide different ways for people to give their views
- ensuring information is easily accessible and shows how local views are being considered during the process.

2.2 What was done?

The table below is an extract of the Consultation Strategy showing the various methods used during the development of the Neighbourhood Plan:

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¹ introduced in the Localism Act 2011

Activity	Details	Frequency	By Whom	Audience
Website www.audleypla n.org	Regular updates of upcoming events, links to agendas and minutes of the Steering Group meetings. Progress reports and draft documents published on this site.	Monthly and as required	Parish Council & Steering Group	Audley residents, community groups and businesses
Social Media	Facebook (via Audley Comm News page and also via Audley Rural Neighbourhood Plan page) to provide links to key documents relating to the Neighbourhood Plan and advertise upcoming meetings and events, plus other groups eg Schools	As required	Steering Group and Audley Comm News editor	Audley Rural residents, community groups and businesses
Existing Community Events	This provided an opportunity to update the community on progress with the Plan, answer questions and conduct surveys and research	As required	Steering Group	Audley Rural residents, community groups
Parish Council Meetings	The meetings are held every month by Audley Rural Parish Council and are open to the Public. It provides a further opportunity for Audley Rural residents and businesses to hear updates on the village and ask questions. Audley Rural Neighbourhood Plan is a standing item on the agenda and an update is provided from the Chair/Secretary of the Steering Group on progress is also made.	Monthly	Parish Council and Steering Group	Audley Rural residents, community groups and businesses
Press Releases	Advertisements for events, progress reports and survey to local press and the local radio station (Hit Mix FM)	As required	Parish Council and Steering Group	Audley Rural residents, community groups and businesses
Posters, banners at gateways and Noticeboards (Audley, Bignall End, Halmer End x 2, Scot	Posters circulated throughout the Parish advertising the Steering Group recruitment campaign, consultation events, household and business surveys, Local Green Space consultation and also Regulation 14 consultation. Placed public spaces such shops, post offices. Roadside banners	As required	Steering Group	Audley Rural residents, community groups and businesses

Activity	Details	Frequency	By Whom	Audience
Hay, Miles Green, Wood Lane, Alsagers Bank and Audley Community Centre x 2)	located at strategic gateway points. Posters placed in the 8 noticeboards in the villages – Wood Lane, Halmer End x 2, Audley, Scot Hay, Miles Green, Alsagers Bank, Bignall End			
Face-to-face Discussions	Opportunities to talk to members of the Steering Group at community and consultation events, the Parish Council meetings. Neighbourhood Plan features on every Parish Council meeting agenda for public to input.	As required	Steering Group	Audley Rural residents, community groups and businesses
Letters to Businesses	Letters will be sent to businesses based within Audley Rural inviting them to engage with the plan and comment during the process. The letters will also offer the opportunity for a face-to-face meeting with members of the Steering Group.	As required	Steering Group	Businesses
Letters to Key (local and other) Stakeholders	This will be to obtain views of other stakeholders such as doctors, dentists, utilities, landowners etc.	As required	Steering Group	All stakeholders that are known
Young people	Logo competition to engage initially with young people under 16 – promoted through schools, shops to draw a logo for the Neighbourhood Plan	July - September	Steering Group	Audley Rural residents (young people)
Input from Schools and students	The views of young people were encouraged during the NP process through contact with the 4 schools.	As required	Steering Group	School pupils and teachers
Questionnaires	A household and business questionnaire collected data on what residents believe are the principal issues and housing needs that	Start and during evidence	Steering Group	Audley Rural residents

Activity	Details	Frequency	By Whom	Audience
	the Neighbourhood Plan will need to address. The results the survey help shape the key policy areas and task groups needed within the NP.	gathering		
Leaflets and Summary Documents	To keep parishioners informed on the Audley Rural Neighbourhood Plan process and be made available via the website and social media. Feedback options will also be made available on the leaflets too. Distributed to every household, 8 x noticeboards around the parish and also in prominent places etc. shops, library, schools etc.	As required	Steering Group	Audley Rural residents

Timeline of key events:

2020

- 19 November 2020 Audley Rural Parish Council passes resolution to make application for designation of a Neighbourhood Area
- 15 December 2020 Audley Rural Parish Council writes to the Head of Planning
- 21 December 2020 Acceptance of Neighbourhood Area by Newcastle under Lyme Borough Council

2021

- January to March 2021 Steering Group recruitment campaign, leaflets in prominent public places, roadside banners, Hit Mix Local radio station, social media, Parish Council meetings
- 22nd April 2021 First meeting of the Audley Rural Neighbourhood Plan Steering Group following recruitment campaign
- May 2021 Procurement process for Neighbourhood Plan consultants, Urban Vision appointment made to provide to work with the Steering Group to build the neighbourhood plan and advise the members on the community engagement
- 31st July 2021 Initial Place Check Consultation and promotion of Neighbourhood Plan Halmer End Plant Sale
- 12th September 2021 Wood Lane Cricket Club event pop up community engagement event for Initial Place Check consultation
- September 2021- Young person's Postcard Competition held and selection of winning logo to be used for Neighbourhood Plan materials
- October to November 2021 Publication for promotion of Neighbourhood Plan on roadside banners
- November 2021 General Publicity leaflet in shops and other public places
- November 2021 Initial meeting with Staffordshire County Council (stakeholder) regarding infrastructure implications

2022

- 25th February 2022 Questionnaire for businesses and general Leaflet 1 delivered to all businesses (closing date Wednesday 27th April 2022)
- 25th February 2022 Householder Questionnaire inc general Leaflet 1 delivered to all households (with entry to a £50 prize draw for returned questionnaires) (closing date Wednesday 27th April 2022)
- 9th March 2022 Householder Questionnaire issued to the 3 Parish Primary schools and Secondary school for completion
- 9th March 2022 Emailed letter to stakeholders eg Dentist, Doctors, Schools, Statutory Services/Utilities, Staffordshire County Council Highways and Infrastructure etc regarding capacity
- 9th March 2022 Information regarding the proposed 103 Local Green Spaces and Parish heritage assets printed and placed in the Audley Library to assist with the responses to the Questionnaire

- 25th April 2022 Community engagement pop up event Parish of Audley Medieval Society community event to promote the questionnaire
- May 2022 Results of questionnaire for businesses and household published on Audley Neighbourhood Plan website
- October 2022 Letter to all landowners, tenants etc with interest in Local Green Spaces
- 7th October to 4th November 2022 54 Local Green Spaces consultation
- October 2022 Local Green Spaces consultation community consultation pop up events x 5 Held on 9th Oct Wood Lane (1) and Audley (2), 23rd Oct Alsagers Bank (3), Halmer End (4) and 28th Oct Bignall End (5)
- November 2022 Leaflet 2 regarding LGS consultation delivered to all households and businesses
- 14th October 2022 Draft policies themes issued to NBC for initial view
- 3rd November 2022 Meeting held with NBC to discuss Draft policies and housing needs assessment
- 13th December 2022 Draft Plan sent to NBC for screening

2023

- Jan 2023 Screening opinion received from Newcastle under Lyme Borough Council
- October 2023 Leaflet 3 regarding Regulation 14 consultation delivered to all households and businesses
- 16th October 2023 to 27th November 2023 Regulation 14 consultation held
- October 2023 Regulation 14 community consultation pop up events Thurs 19th Oct 2023 Audley (1), Sat 11th Nov Halmer End (2), Alsagers Bank (3), Audley (4), Wood Lane (5), Thurs 16th Nov Halmer End (6)
 - All consultation documents on Audley Rural Parish Neighbourhood Plan website and Audley Rural Parish Council website
 - Hard copies were available to view in Parish Council Office, Library, Bignall End Post Office, Audley Post Office,
 Halmer End Post Office, Wood Lane Post Office and Halmer End Institute (Minnies Café)
 - Hard copies available by post to residents where required
 - o Landowners consulted
 - o Statutory bodies and consultees consulted
 - Newcastle under Lyme Borough Council consulted

2024

 April 2024 Steering Group meeting with Protect Audley Parish Greenbelt Campaign Group (PAPG) regarding Draft Plan Reg 14 version April 24

Timeline showing the build up to the Neighbourhood Plan (as publicised and updated on the website)

Audley Rural Neighbourhood Plan Area designated - December 2020

Neighbourhood Plan Steering Group formed - April 2021

Development of Plan - June 21 to November 2022

Housing Needs Assessment Stakeholder engagement, Householder questionnaire

Design code, Character Assessment Non-designated Heritage Asset selection, Green Space audit/analysis

Analysis and Issues/Aims Policy mapping, issues, options, solutions Input into NBC Local Plan/Housing Sites

Plan writing and draft Plan - Nov 21 to March 2023

Policy and Proposals Formulation

Plan Writing

Pre submission Regulation 14 Consultation (6 weeks) – 16 Oct to 27 Nov 2023

Submission to Borough Council - Regulation 16 - June 2024

Examination - January/February 2025* Timetable subject to Borough Council

2.3 Who was targeted?

The Community Engagement Strategy targeted all members of the community to encourage community participation throughout all stages of the process. Full list of community organisations is available at **Appendix B** and Statutory consultees are at Section 3.2.

We sought to engage with different groups of local people², including (but not limited to)::

- Residents
- · Community groups, clubs and societies
- Businesses
- Landowners
- · Schools, Doctors, Pharmacy and Dentist
- Audley Rural Parish Council
- Neighbouring Parishes
- Newcastle Borough Council and Councillors
- Staffordshire County Council and Councillor
- Utility companies (e.g. Severn Trent, United Utilities, National Grid etc)

2.4 Outcomes/Feedback of Consultation

Initial Consultation - 2021

Emerging policy themes were informed by the early community engagement results collated during October 2021. This information provided the starting point for considering the scope and policy themes of the Draft Audley Rural Neighbourhood Plan.

1. Community Infrastructure and Recreation:

- Sufficient play areas, however other recreation uses? Suitable facilities for older children.
- Enhance/expand BMX track.
- Importance for health and well-being of PRoW.
- Public Transport provision or alternative travel methods.
- Protect and support community facilities and assets
- Support a range of commercial retail uses.

-

² See Appendix B for full list of Local Stakeholders.

2. Design:

- This will be informed by the design codes technical support.
- Potential special policy areas include:
 - 1. Alsagers Bank
 - 2. Audley
 - 3. Bignall End
 - 4. Halmer End
 - 5. Miles Green
 - 6. Scot Hay
 - 7. Wood Lane
- Rural character and feel of the Neighbourhood Area.
- Prevent the coalescence of settlements.
- On street parking issues.
- Shop signage and shopfront design.
- Eco-design.
- Bespoke and site specific design not off the peg 'anywhere'.

3. Housing:

• The type and mix of homes needed by people in will be informed by the Housing Needs Assessment (HNA) technical Support. However, the consultation suggests more homes needed for older people and downsizing.

4. Historic Environment:

- Identify non-designated heritage assets.
- Potential historic landscape character areas.

5. Local Green Space Designations:

• Identified a number of potential Local Green Space to be taken through first round consultation.

6. Movement and Transport:

 Movement and access (particularly countryside), connectivity and permeability to the PRoW network and surrounding footpaths.

- Marion's Way as traffic free route to school?
- Cumulative impact of developments on road infrastructure capacity.

7. Natural Environment:

• Protect special landscape features to be identified in Staffordshire Wildlife mapping data and other sources.

Householder and Business Questionnaire – February 2022

Following further community engagement through the householder and business questionnaire in February 2022, the emerging policy themes were expanded and new areas identified. The feedback from the householder and business survey was collated into a detailed report produced by an external consultant, using text and graphs. The key findings were also displayed as a set of infographics – see **Appendix C** to aid easy reference alongside the report. Both documents were shared with the Parish Council and also publicised on the Audley Rural Neighbourhood website.

A policy mapping exercise was carried out in a workshop with UVE and the members of the Steering Group on Tuesday 26th of April 2022 following the analysis of the survey to provide the following main policy areas to address the main issues that were emerging regarding housing, economy, business, Audley Church Street (village centre), design and heritage, green guidance and environment, and infrastructure. These themes were used to inform the following policies.

1. Housing

ANP1: Residential Development

Support housing: in village envelopes, infill, conversions

Housing mix (based on HNA), including accommodation for older people.

Housing standards (space, bins, amenity).

Play (avoid further fragmented facilities).

ANP2: Older Persons Hub

Site allocation or opportunities for new hub (facilities, accommodation, etc.)

2. Economy

ANP3: Business

Support business facilities (office space and other E Use Class uses) in settlements.

Diversification of agriculture supported.

Subject to impacts.

ANP4: Audley Church Street

Support development that preserves, enhances vitality

Resist loss of facilities/diversity

Resist loss of ground floor community/commercial uses

Retain shopfronts for ground floor frontage units (cross ref to later shopfront policy)

3. Design and Heritage

ANP5: Sustainable Design

Building for Life principles/good urban design – pedestrian permeability, safety, scale and context, boundaries, materials, green design, public realm and green space, refer to green guidance note. etc. Cross reference to later green infrastructure policy.

4. Green guidance note.

ANP6: Audley Conservation Area

Complement character - key characteristics.

ANP7: Character of Settlements

Complement character of other settlements (clause for each settlement, setting out key characteristics). Clauses for Alsagers Bank, Bignall End, Halmer End, Miles Green, Scot Hay, Wood Lane.

ANP8: Heritage

John Wedgwood Memorial – monument, setting, views.

Non-designated heritage assets

ANP9: Shopfronts

Retention and support reinstatement of historic shopfronts.

Shopfront design.

5. Green Environment

ANP10: Natural Environment and Landscape

Protect designated and sensitive landscapes, and landscape features, based on Wildlife Trust report.

Landscape settings and separation of settlements.

ANP11: Green Infrastructure

Biodiversity net gain.

Green infrastructure in new development (net gain and amenity)

Encourage allotments and local food growing and community gardens

ANP12: Local Green Space Designate and protect LGS.

6. Infrastructure

ANP13: Transport and Active Travel

Secure space for cycles in new dev

Varied parking provision

Cumulative impacts of development on road capacity and safety

No adverse impact on paths, cycle routes, PROW and greenway, Marion Plats Way, Former Mineral Line, etc.

Cross ref. to pedestrian requirements in design policy.

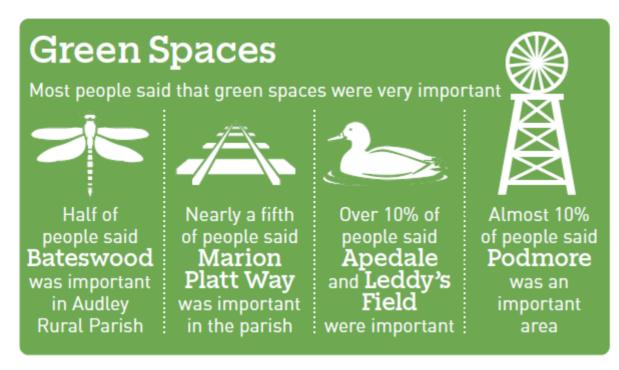
ANP14: Local and Micro Generation

Support, subject to impacts.

Includes farm diversification – other locations? Locations to avoid?

Local Green Space Consultation – October 2022

The Household survey conducted in the spring of 2022 showed which green spaces people felt most strongly about, as shown in the below infographics.



Extract of ARNP Household Survey Results 2022

We have used the information from the survey along with local knowledge to produce a long list of 103 Local Green Space sites. The long list was tested against the NPPF criteria to produce 54 proposed Local Green Space sites.

A detailed consultation was carried out from 7th October to 4th November 2022 on the 54 Local Green Spaces. The results of the consultation were considered and the outcomes of this consultation reduced the number of Local Green Spaces to 48, which were taken forward in the Draft Audley Rural Neighbourhood Plan.

Consultation outcomes informing the Draft Audley Rural Neighbourhood Plan

The outcomes of the above consultation exercises informed the 13 policies which forms the content of the Draft Audley Rural Neighbourhood Plan as follows:

1. Housing

ANP1 Residential Development

2. Economy

ANP2 Business and Community Facilities ANP3 Audley Village Centre (Church Street)

3. Design and Heritage

ANP4 Sustainable Design ANP5 Audley Conservation Area ANP6 Character of Settlements ANP7 Heritage ANP8 Shopfronts

4. Green Environment

ANP9 Natural Environment and Landscape ANP10 Green Infrastructure ANP11 Local Green Space

5. Infrastructure

ANP12 Transport and Active Travel ANP13 Local Energy Generation

6. Green Development Guidance Note

Planning Principles
Green Building Design
Biodiversity
Public Realm and Green Landscape Design

3. Pre-Submission Consultation (Regulation 14)

The Regulation 14 consultation on the Audley Rural Neighbourhood Plan was carried out from 16th October 2023 to 27th November 2023.

3.1 How the Consultation Was Undertaken

A consultation strategy was developed that aimed to engage with as wide a cross-section of the parish population as possible, and provide a wide variety of different ways for people to get involved. The aim was to ensure that all local residents and businesses were aware of the draft Plan and how to comment on it.

In addition all relevant statutory consultees were contacted by e-mail. Key statutory consultees (including adjoining local authorities and parish councils) were also contacted by letter and sent a copy of the draft Audley Rural Neighbourhood Plan.

Audley Rural Parish Council consulted local people by the following methods:

- uploading the draft Audley Rural Neighbourhood Plan and supporting documents to the Neighbourhood Plan website https://www.audleyplan.org/regulation14.php
- promotion through the Audley Rural Parish Council's website and meeting agendas
- providing a hard copy of the Plan and supporting documents in the Library and 4 Post offices, local Pub and also a popular community café
- publicising the Plan in a variety of ways
- holding open topic-based meetings to answer questions about the Plan;
- Publicising the consultation events involved by a leaflet and summary of the Draft Plan being delivered by hand to every household and business in the Parish:
- displaying posters at a number of locations around the Parish including sports clubs, schools x 4, takeaways, builders merchants, Community halls, Cricket clubs x 4, doctors, pharmacy, pubs, post offices, all shops and in the 8 parish noticeboards
- Five roadside banners which displayed at gateway locations (Barthomley Road and Alsager Road, Audley; Scot Hay, Wood Lane and Halmer End) around the Parish.

Feedback was invited through email, letter and via the website on an online form from 16th October 2023 to 27th November 2023.

The following events were held at various times and points during the week including evenings and weekends to give residents an opportunity to ask questions prior to the end of the Regulation 14 consultation period:

- Thurs 19th Oct 2023 Audley (1)
- Sat 11th November 2023 Halmer End (2), Alsagers Bank (3), Audley (4), Wood Lane (5)
- Thurs 16th November 2023 Halmer End (6)

The consultation complied with Gunning Principles.

3.2 Statutory Consultees

The following consultees were consulted on Friday 13th October 2023 by email. Note although not included on the list provided by Newcastle under Lyme Borough Council, Active Travel England (email Planning-Advice@activetravelengland.gov.uk) were also consulted by email at the same time, as these were a recent new Statutory Consultee not included by the Local Planning Authority.

Organisation	Address	Email address
LOCAL AUTHORITIES		
Newcastle-under- Lyme Borough Council	Civic Offices, Merrial Street, Newcastle-under-Lyme, ST5 2AG	planningpolicy@newcastle- staffs.gov.uk
Staffordshire County Council	Wedgwood Building, Block A, Tipping Street, Stafford, ST16 2DH	planning@staffordshire.gov.uk
Staffordshire County Council Highways	2 Staffordshire Place, Tipping Street, Stafford ST16 2DH	transportdcnewcastle@staffordshire.go v.uk
NEIGHBOURING LOCAL AUTHORITIES		

Organisation	Address	Email address
Cheshire East Borough Council	Spatial Planning Team, Cheshire East Borough Council, Westfields, Middlewich Road, Sandbach CW11 1HZ	localplan@cheshireeast.gov.uk
Shropshire Council	Shropshire Council, Planning Policy & Strategy Team Shirehall, Shrewsbury, SY2 6ND	planning.policy@shropshire.gov.uk
Stafford Borough Council	Forward Planning, Stafford Borough Council, Civic Centre Riverside, Stafford, ST16 3AQ	forwardplanning@staffordbc.gov.uk
Stoke-on-Trent City Council	Planning Policy, Civic Centre, Glebe Street, Stoke-on-Trent, ST4 1HH	localplan@stoke.gov.uk
Staffordshire Moorlands District Council	Regeneration Manager, Staffordshire Moorlands District Council, Moorlands House, Stockwell Street, Leek ST13 6HQ	forward.plans@staffsmoorlands.gov.uk
PARISH COUNCILS		
Audley Rural Parish Council	Mrs C Withington - Clerk to Audley Parish Council The Croft, Barthomley Road, Audley, Stoke on Trent, ST7 8HU	audleyparishcouncil@hotmail.co.uk
Betley, Balterley & Wrinehill Parish Council	Mr G Griffiths - Clerk to Betley, Balterley and Wrinehill Parish Council 18 Holly Mount, Basford, Crewe, Cheshire, CW2 5AZ	griffiths725@btinternet.com
Chapel and Hill Chorlton Parish Council	Mrs Janet Simpson - Clerk to Chapel and Hill Chorlton Parish Council	chapelandhillchorltonpc@gmail.com
Keele Parish Council	Clerk to Keele Parish Council	clerk.keelepc@gmail.com

Organisation	Address	Email address
	10 William Coltman Way, Swallows Rise, Tunstall, Stoke-on-Trent, ST6 5BX	
Kidsgrove Town Council	Clerk to Kidsgrove Town Council, Town Hall, Kidsgrove, Stoke-on-Trent, ST7 4EL	admin@kidsgrovetowncouncil.gov.uk
Loggerheads Parish Council	c/o Loggerheads Community Fire Station, Market Drayton Road, Loggerheads, TF9 4EZ	loggerheadspc@btconnect.com
Madeley Parish Council	Mrs Janet Simpson - Clerk to Madeley Parish Council, 10 Freebridge Close, Longton, Stoke on Trent, ST3 5QX	parish.clerk@madeley.staffslc.gov.uk
Maer & Aston Parish Council	Elena Sudlow - Clerk to Maer Parish Council The Garden House, Maer, Newcastle, ST5 5EF	maeraston@hotmail.com
Silverdale Parish Council	Clerk to Keele Parish Council 10 William Coltman Way, Swallows Rise, Tunstall, Stoke-on- Trent, ST6 5BX	clerk.keelepc@gmail.com
Whitmore Parish Council	Debra Powell – Clerk to Whitmore Parish Council 10 William Coltman Way, Swallows Rise, Tunstall, Stoke-on- Trent, ST6 5BX	Parish.clerk@whitmoreparishcouncil.co
NEIGHBOURING PARISH COUNCILS		
Alsager Town Council	Alsager Town Council, 3 Lawton Road, Alsager, Cheshire, ST7 2AE	admin@Alsagertowncouncil.org.uk
Barthomley Parish Council	Mark Bailey – clerk to Barthomley Parish Council 4 Post Office Square	mbailey87@hotmail.com
	Madeley Staffordshire	

Organisation	Address	Email address
	CW3 9PG	
Weston & Basford Parish Council	Weston Basford Parish Council, Chapel Cottage Englesea Brook, Crewe, CW2 5QW	clovelly@davidgeorgeowen.plus.com
Odd Rode Parish Council	The Parish Office, Newfield House, Brook Lane, Astbury, Cheshire, CW12 4TJ	clerk@oddrode.org.uk oddrodeclerk@gmail.com
Doddington & District Parish Council	Parish Clerk, 185 Alton Street, Crewe, CW2 7PU	mail@doddingtonpc.co.uk doddingtonparishclerk@btinternet.com
Hough and Chorlton Parish Council	Rose Villa, Foden Avenue, Alsager, Stoke-on-Trent, ST7 2PT	houghparishcncl@btinternet.com clerk@houghandcharlton-pc.gov.uk
Norton in Hales Parish Council	Laurel House, 12 Pemberton Close, Ightfield, Whitchurch SY13 4BF	nortoninhalespc@yahoo.co.uk nortoninhalespc@outlook.com
Market Drayton Town Council	18 Frogmore Road, Market Drayton, Shropshire, TF9 3AX	townclerk@marketdrayton.gov.uk
Sutton upon Tern Parish Council	Woodseaves, Market Drayton, Shropshire, TF9	suttonparishcouncil@hotmail.co.uk
Cheswardine Parish Council		cheswardineparishcouncil@hotmail.co m
Standon Parish Council		standonpcclerk@yahoo.co.uk info@standonparish,org.uk
Swynnerton Parish Council		lizharringtonjones@hotmail.co.uk clerkswynnerton@yahoo.com
Biddulph Parish Council	Biddulph Town Council, Town Hall, High Street, Biddulph, Staffordshire ST8 6AR	biddulph@staffordshire.gov.uk office@biddulph-tc.gov.uk

Facility of Davids Court 1 40 Novement David Court	
Eccleshall Parish Council, 16, Newport Road, Great Bridgeford, Stafford, ST18 9PR	eccleshallpc@gmail.com
Woore Parish Council, North Barn, Church House Farm, Coole Lane, Nantwich, CW5 8AB	clerk@wooreparishcouncil.org
Church Lawton Parish Council, c/o Rose Villa Foden Avenue, Alsager, ST7 2PT	CLparishclerk@gmail.com clerk@churchlawton-pc.gov.uk
Planning And Local Authority Liaison, 200 Lichfield Lane Berry Hill, Mansfield, Nottinghamshire, NG18 4RG	planningconsultation@coal.gov.uk
Homes and Communities Agency, Fry Building, 2 Marsham Street, London, SW1P 4DF	mail@homesandcommunities.co.uk
Consultation Service, Hornbeam House, Electra Way Crewe Business Park, Crewe, Cheshire, CW1 6GJ	Consultations@naturalengland.org.uk
Environment Agency, Sentinel House, 9 Wellington Crescent, Fradley Park, Lichfield, WS13 8RR	swwmplanning@environment- agency.gov.uk
The Axis, 10 Holliday Street, Birmingham, B1 1TG	midlands@HistoricEngland.org.uk
Town Planning Team LNW, Desk 122 - Floor 1, Square One, 4 Travis Street, Manchester, M1 2NY	TownPlanningLNW@networkrail.co.uk
Network Strategy West Midlands, Highways Agency C3 5 Broadway, Broad Street, Birmingham, B15 1BL	PlanningWM@highways.gsi.gov.uk
	consultations.mmo@marinemanagement.org.uk
	Planning And Local Authority Liaison, 200 Lichfield Lane Berry Hill, Mansfield, Nottinghamshire, NG18 4RG Homes and Communities Agency, Fry Building, 2 Marsham Street, London, SW1P 4DF Consultation Service, Hornbeam House, Electra Way Crewe Business Park, Crewe, Cheshire, CW1 6GJ Environment Agency, Sentinel House, 9 Wellington Crescent, Fradley Park, Lichfield, WS13 8RR The Axis, 10 Holliday Street, Birmingham, B1 1TG Town Planning Team LNW, Desk 122 - Floor 1, Square One, 1 Travis Street, Manchester, M1 2NY Network Strategy West Midlands, Highways Agency

Organisation	Address	Email address
ELECTRONIC COMMUNICATIONS CODE OPERATORS		
Cornerstone Telecommunications Infrastructure Limited (Vodafone UK & Telefonica UK)	The Exchange, Building 1330, Arlington Business Park, Theale, Berkshire, RG7 4SA	emf.enquiries@ctil.co.uk
British Telecommunications Plc	81, Newgate Street, London, EC1A 7AJ	
EE Ltd (EE, Orange & T Mobile)	Trident Place, Hatfield Business Park, Mosquito Way, Hatfield, Hertfordshire AL10 9BW	
Hutchinson 3G Ltd	Star House, 20 Grenfell Road, Maidenhead SL6 1EH	
PRIMARY CARE TRUST		
North Staffordshire Clinical Commissioning Group	Morston House, The Midway, Newcastle-under-Lyme, ST5 1QG	Staffordccg.feedback@northstaffs.nhs. uk
UTILITIES		

Organisation	Address	Email address
Energy Providers	To search for the electricity and gas operators in your area, search at:	
	http://www.energynetworks.org/info/faqs/who-is-my-network- operator.html	
Western Power Distribution	Western Power Distribution, Toll End Road, Tipton DY4 0HH	enquiries@westernpowerworkshops.co .uk
National Grid	Amec Foster Wheeler E&I UK, Gables House, Kenilworth Road, Leamington Spa, Warwickshire CV32 6JX	n.grid@amecfw.com
National Grid	National Grid House, Warwick Technology Park Gallows Hill, Warwick, CV34 6DA	box.landandacquisitions@nationalgrid.c om
SP Energy Networks	SP Energy Networks, Data Management (England and Wales), Prenton Way, Prenton, CH43 3ET	requestforplansmanweb@sppowersyst ems.com
Energetics Electricity	Fenick House, Lister Way, Hamilton International Technology Park Glasgow, G72 0FT	Site.midlands@energetics-uk.com
Cadent Gas	Block 1, Floor 1, Brick Kiln Street, Hinckley, LE10 0NA	plantprotection@cadentgas.com
Severn Trent Water	Operations Management, Asset Protection (Waste Water) West Regis Road, Tettenhall, Wolverhampton, WV6 8RU	growth.development@severntrent.co.u k

Organisation	Address	Email address
United Utilities	External Planning Liaison, Ground Floor, Thirlmere House, Ingley Mere, Liverpool Road, Lingley Green Avenue, Warrington, WA5 3LP	planning.liaison@uuplc.co.uk
VOLUNTARY ORGANISATIONS ETC		
Saltbox	Adelaide House, Adelaide Street, Burslem, Stoke-on-Trent, Staffordshire, ST6 2BD	email@saltbox.org.uk
Staffordshire Chamber of Commerce	Commerce House, Festival Park, Stoke On Trent, ST1 5BE	info@staffordshirechambers.co.uk
Stoke-on-Trent and Staffordshire Local Enterprise Partnership	Stoke-on-Trent and Staffordshire Local Enterprise Partnership, Judges' Chambers, County Buildings, Martin Street, Stafford, ST16 2LH	joanne.kemp@enterprisestokestaffs.or g.uk
Disability Solutions	North Staffordshire Medical Institute, Hartshill Road, Stoke-on- Trent ST4 7NY	general@disability-solutions.net
Support Staffordshire	Support Staffordshire (Staffordshire Moorlands), Bank House, St Edward Street, Leek, Staffordshire, ST13 5DS	Staffordshiremoorlands@supportstaffor dshire.org.uk
Age UK North Staffordshire	83-85 Trinity Street, Hanley, Stoke-on-Trent ST1 5NA	info@ageuknorthstaffs.org.uk
Age UK	Age UK, Tavis House, 1-6 Tavistock Square, London WC1H 9NA	contact@ageuk.org.uk
OTHER CONSULTEES		

Organisation	Address	Email address
Sport England		planning.central@sportengland.org
Canals and Rivers Trust	Canal & River Trust, Red Bull Wharf, Congleton Road South, Church Lawton, Stoke-on-Trent, Staffordshire, ST7 3AP	customer.services@canalrivertrust.org. uk
HS2	HS2 Limited, Two Snowhill, Snowhill Queensway, Birmingham, B4 6GA	HS2Enquiries@hs2.org.uk
Staffordshire Fire and Rescue Service	Pirehill, Stone, Staffordshire, ST15 0BS	webmaster@staffordshirefire.gov.uk
Staffordshire Police	Staffordshire Police Headquarters, PO Box 3167 Stafford, ST16 9JZ	stoke.cru@staffordshire.pnn.police.uk
Staffordshire Wildlife Trust	The Wolseley Centre, Wolseley Bridge, Stafford, ST17 0WT	info@staffs-wildlife.org.uk k.dewey@staffs-wildlife.org.uk (Planning Officer)

3.3 Issues

The complete responses to the Regulation 14 public consultation are provided in **Section 4 - Tables of Representations**, **Responses and Modifications to the Neighbourhood Plan**. The table includes responses from:

- Table 1 Statutory Consultees, groups and organisations including Newcastle under Lyme Borough Council
- Table 2 Residents and Landowners

Newcastle under Lyme Borough Council Planning Policy (NBC) provided detailed comments in response to the Regulation 14 consultation. A summary of the main comments has been provided below, detailed comments and the response and modifications made in the Draft Plan are included in **Section 4 - Tables of Representations, Responses and Modifications to the Neighbourhood Plan**:

- Section 1.3 Monitoring and Review: Neighbourhood Plan should carefully consider the new NPPF and its content where relevant to the Plan's production and application.
- Section 2.4: Overall Planning Strategy –footnote is included within the first sentence of paragraph 2 that refers to the latest published Local Development Scheme (LDS) & the current timeline for adoption of the Local Plan.
- Section 2.6: Aims —consider how aims align with the Basic Conditions and with strategic policy specifically, particularly Green Belt. Noting implications for Audley during recently consulted Reg 18 Draft Local Plan which it is considered presents the exceptional circumstances to necessitate the release of land that is currently designated as Green Belt and careful consideration to the interactions between the two in preparing their Plan i.e. Health Check assessment by qualified independent parties to provide advice on any potential amendments required to ensure the basic conditions are met.
- Section 3.1. Housing Purpose In the absence of allocations clarity could be provided on how it is envisaged that these various aspects of the Plan align and to reconsider if site allocations should be included.
- Section 3.2 Planning Rationale A separate sub-heading should be included that covers the progression of the Local Plan up to its current point
- Audley Rural Housing Needs Assessment More clarity & explanation could be provided to elucidate why despite the
 housing figure seemingly changing substantially between 2021 & 2023 (noting that the last release of the outputs of the
 2021 census from the ONS are not until the winter of 2023), the specific housing need figures have not altered accordingly
 and now equate to the vast majority of what is anticipated to be delivered over the Neighbourhood Plan period.

- Policy ANP1: Residential Development Points 1 & 2 See comments above re: strategic policy alignment & deliverability. Recognition should be made in the Interpretation section stating that the settlement boundaries may alter to reflect the position reached upon the adoption of the Local Plan, including areas which are currently designated as Green Belt.
- Point 6c (of ANP1) Balconies are more typical of tall buildings, so this reference may not be relevant to the settlements & prospective development within the neighbourhood plan area.
- Economy The Council consulted on a number of strategic location(s) in the First Draft Local Plan. Site ref: AB2 falls within the neighbourhood plan area. Whilst no decision has been reached as to its inclusion as an employment allocation within subsequent iterations of the Local Plan, it is important to be conscious that this may in due course present issues in terms of strategic alignment and the Steering Group are urged to be conscious that they may need to evaluate the implications of this accordingly.
 - Interpretation Consideration should be given to impacts on amenities being referred to as significantly adverse/excessive and/or not appropriately mitigated
- Policy ANP3: Audley Village Centre (Church Street) refer to vitality (as well as the already mentioned viability) to align with Section 7 of the NPPF
- Design & Heritage Through their role as a consultee, Historic England will be well placed to advise on the heritage aspects.
- Policy ANP4: Sustainable Design Point 1 is unclear as to what is meant by 'proportionate to the scale & nature of the development', so consider rewording this aspect to clarify intent & for ease of application in the development management process.
 - Interpretation for the paragraph on Design and Access Statements include in brackets 'submitted with Planning Applications'.
- Policy ANP7: Heritage Clarify extent of surrounding area...for instance, confined to those surrounding areas in that fall within the boundaries of the defined neighbourhood area. As appropriate, include more explanatory text to this effect in the Implementation section
- Figure 6.6: Strategic Green Gaps It is unclear as to the justification for their inclusion, especially given the extent of Green Belt (of which avoiding coalescence of settlements is a key function). No clear argument presented that there is a substantive heightened risk from development of coalescence, along with any consequent erosion of distinctive character and landscape setting within the areas where the Gaps are highlighted.
- This argument is also relevant to Policy ANP9, bullet Point 2 & the maintaining of separation between settlements.
- Figure 6.10: Local Green Spaces across the neighbourhood area Paragraph 102 of the NPPF designations need to be demonstrably special & whilst this is alluded to in Section 2.4, the Local Green Space Designation audit is valuable in making a more explicit case by case basis detailing the rational for each site being considered demonstrably special & holding a particular local significance. It is important, nonetheless, that in each circumstance (based on the list under Policy ANP11) you are confident that the additional designation is necessary and would serve a useful purpose.

- The approach to the use of Best & Most Versatile agricultural land should look to consider point 6 of the Draft Local Plan Policy PSD4: Development Boundaries and the Open Countryside to achieve consistency of approach.
- Infrastructure Section 7.2: Planning Rationale Include reference to the Infrastructure Delivery Plan which forms part of the Local Plan evidence base.
- Policy ANP12: For bullet point 2, the role of transport assessment & travel plans will be significant determinants of impacts & mitigation, so this should be referenced.
- Section 8.2: Green Building Design Noted that circumstances where viability means that aspects of these could not be reasonably achieved. Given this, site specific considerations will be important factors and some of these technologies/methods may not be suitable for historic and older areas by virtue of reasons including aesthetics & engineering difficulties and this would be worth acknowledging also.
- Section 8.3: Biodiversity Guidance on this nationally is still emerging & advisories from Natural England and Defra could be valuable reference points. In January 2024, there is also a mandatory requirement for implementation of Biodiversity Net Gain by local authorities which you may wish to highlight as a footnote.

Regulation 14 responses were submitted by several consultation bodies are summarised below with the response for the Draft Plan from the Steering Group in bold alongside. Detailed comments and the response and modifications made in the Draft Plan are included in **Section 4 - Tables of Representations, Responses and Modifications to the Neighbourhood Plan**:

- Active Travel England Standard response provided **Noted.**
- Environment Agency Standard response provided with general remarks about site allocations and guidance for new housing Section 8.4 updated to refer to surface water management. Climate change is addressed throughout the policies. The Neighbourhood Plan does not make housing site allocations.
- Sport England Comments regarding NPPF relevant provisions around active travel, new recreation, sports and playing pitches for new housing. The Plan deals with active travel, recreation, rights of way and landscape and green infrastructure protection in various policies. The Local Green Spaces include land used for sports and recreation. The Neighbourhood Plan does not make housing site allocations but does make provision for proportionate growth within the settlements.
- Historic England No adverse comments to make which takes a suitably proportionate approach to the main historic
 environment issues pertaining to Audley. Commend the commitment in the Plans vision, aims and Policies to support
 development that is sensitive and sympathetic to the built character of the area and afford protection to its rural landscape
 character and green spaces. The use of Design Codes will no doubt prove invaluable as a context and guide for future
 development. Comments noted.

- National Gas Standard response Comments noted.
- National Grid Electricity Standard response *Comments noted.*
- Natural England no specific comments on this draft neighbourhood plan Comment noted.
- The Coal Authority Neighbourhood Plan does not propose to allocate any new sites for development so no objections to, or specific comments to make, on this document – *Comments noted*.
- United Utilities Water Limited Noted that no site allocations for development proposed. New policies suggested around sewerage infrastructure, surface water, climate resilient development and SUDS. Sewerage infrastructure is a matter for the utility provider. Sewers in development would be dealt with under building regulations. Surface water is already dealt with in national policy and local plan policy. ANP4 supports climate resilient development. The Green guidance note includes reference to Sustainable Drainage Systems (SuDS). Section 8.4 amended to include an edited version of this text. Suggested policy goes beyond the scope of planning policy. This appears to relate to building regulations. An additional policy at this stage would involve a need to repeat the Regulation 14 consultation. The green guidance note already mentions water efficiency including rainwater capture, storage and re-use.
- Staffordshire County Council Received Comments on 3 LGS sites. The comments were received after the deadline so have not been taken into account. Similar comments were made at an earlier stage and were given rigorous consideration.

A total of 18 residents provided written comments in response to the Regulation 14 consultation. The main areas of concern related to the emerging Local Plan for Newcastle under Lyme Borough in respect of the proposed housing sites and housing numbers plus the consultation on a number of strategic employment sites for the Borough.

The areas of concern relating to the Audley Rural Neighbourhood Plan included the type and mix of housing needed in relation to historic population growth, preserving the rural character and openness of the Neighbourhood area, protecting the important green spaces and heritage assets, sustainable design to mitigate against climate change and concerns around existing infrastructure.

Amendments were made to the Audley Rural Neighbourhood Plan policies throughout the document following the comments received. More detail can be seen for the comments, response and the modifications made to the Neighbourhood Plan in **Section 4 – Responses to Representations and Modifications to the Neighbourhood Plan**.

4. Tables of Representations, Responses and Modifications to the Neighbourhood Plan

Audley Rural Neighbourhood Plan - Responses to Representations - Regulation 14 Consultation (Mon 16th October to Mon 27th November 2023)

Table 1 - National and Statutory Bodies

Organisation	Page no/ Policy	Representation	Response
		National and Statutory Bodies	
Active Travel England 16 Oct 23	N/A	Thank you for your email and for your interest in Active Travel England. Since Thursday 1st June 2023 ATE has been a statutory consultee on all planning applications for new developments that meet or exceed one of more of its application thresholds. This statutory consultee role does not extend to local planning or planning policy, therefore ATE should not be consulted on any Local Plans or planning policy and does not currently intend to respond to any consultations that it does receive. We have recently launched a discovery project for planning policy and Local Plans to scope out opportunities for ATE's involvement in the future. Should there be any changes to the planning system due to this project then we will update planning authorities at that time. Should you have any queries on the above then please get in touch with the team at: Planning-Advice@activetravelengland.gov.uk.	Comments noted.
Environment Agency 14 Nov 23	N/A	We have reviewed the submitted document and would offer the following comments:	Section 8.4 updated to refer to surface water management.

Organisation	Page no/ Policy	Representation	Response
		In the absence of specific site allocations, we would not offer bespoke comment at this time. We do not offer detailed bespoke advice on policy.	Climate change is addressed throughout the policies.
		We would advise you ensure conformity with the Local Plan and utilise the attached Environment Agency Guidance and Pro-forma which should assist you moving forward with your plan. Matters relating to surface water (pluvial) flooding should be directed to Newcastle Under-Lyme Borough Council as the Lead Local Flood Authority (LLFA).	The Neighbourhood Plan does not make housing site allocations.
Sport England 17 Nov 23		Thank you for consulting Sport England on the above neighbourhood plan. Government planning policy, within the National Planning Policy Framework (NPPF), identifies how the planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities. Encouraging communities to become more physically active through walking, cycling, informal recreation and formal sport plays an important part in this process. Providing enough sports facilities of the right quality and type in the right places is vital to achieving this aim. This means that positive planning for sport, protection from the unnecessary loss of sports facilities, along with an integrated approach to providing new housing and employment land with community facilities is important. Therefore, it is essential that the neighbourhood plan	The Plan deals with active travel, recreation, rights of way and landscape and green infrastructure protection in various policies. The Local Green Spaces include land used for sports and recreation.
		reflects and complies with national planning policy for sport as set out in the NPPF with particular reference to Pars 98 and 99. It is also important to be aware of Sport England's	

Organisation	Page no/ Policy	Representation	Response
		statutory consultee role in protecting playing fields and the presumption against the loss of playing field land. Sport England's playing fields policy is set out in our Playing Fields Policy and Guidance document. https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#playing fields policy Sport England provides guidance on developing planning policy for sport and further information can be found via the link below. Vital to the development and implementation of planning policy is the evidence base on which it is founded. https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#planning_applications Sport England works with local authorities to ensure their Local Plan is underpinned by robust and up to date evidence. In line with Par 99 of the NPPF, this takes the form of assessments of need and strategies for indoor and outdoor sports facilities. A neighbourhood planning body should look to see if the relevant local authority has prepared a playing pitch strategy or other indoor/outdoor sports facility strategy. If it has then this could provide useful evidence for the neighbourhood plan and save the neighbourhood planning body time and resources gathering their own evidence. It is important that a neighbourhood plan reflects the recommendations and actions set out in any such strategies, including those which may specifically relate to the neighbourhood area, and that any local investment opportunities, such as the	

Organisation	Page no/ Policy	Representation	Response
		Community Infrastructure Levy, are utilised to support their delivery.	
		Where such evidence does not already exist then relevant planning policies in a neighbourhood plan should be based on a proportionate assessment of the need for sporting provision in its area. Developed in consultation with the local sporting and wider community any assessment should be used to provide key recommendations and deliverable actions. These should set out what provision is required to ensure the current and future needs of the community for sport can be met and, in turn, be able to support the development and implementation of planning policies. Sport England's guidance on assessing needs may help with such work. http://www.sportengland.org/planningtoolsandguidance If new or improved sports facilities are proposed Sport England recommend you ensure they are fit for purpose and designed in accordance with our design guidance	
		notes. http://www.sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance/	
		Any new housing developments will generate additional demand for sport. If existing sports facilities do not have the capacity to absorb the additional demand, then planning policies should look to ensure that new sports facilities, or improvements to existing sports facilities, are secured and delivered. Proposed actions to meet the demand should accord with any approved local plan or	The Neighbourhood Plan does not make housing site allocations but does make provision for proportionate growth within the settlements.

Organisation	Page no/ Policy	Representation	Response
		neighbourhood plan policy for social infrastructure, along with priorities resulting from any assessment of need, or set out in any playing pitch or other indoor and/or outdoor sports facility strategy that the local authority has in place.	
		In line with the Government's NPPF (including Section 8) and its Planning Practice Guidance (Health and wellbeing section), links below, consideration should also be given to how any new development , especially for new housing, will provide opportunities for people to lead healthy lifestyles and create healthy communities. Sport England's Active Design guidance can be used to help with this when developing planning policies and developing or assessing individual proposals.	
		Active Design, which includes a model planning policy, provides ten principles to help ensure the design and layout of development encourages and promotes participation in sport and physical activity. The guidance, and its accompanying checklist, could also be used at the evidence gathering stage of developing a neighbourhood plan to help undertake an assessment of how the design and layout of the area currently enables people to lead active lifestyles and what could be improved.	
		NPPF Section 8: https://www.gov.uk/guidance/national-planning-policy-framework/8-promoting-healthy-communities	
		PPG Health and wellbeing section: https://www.gov.uk/guidance/health-and-wellbeing	

Organisation	Page no/	Representation	Response
Historic England 17 Nov 23	T-OIICY	Sport England's Active Design Guidance: https://www.sportengland.org/activedesign (Please note: this response relates to Sport England's planning function only. It is not associated with our funding role or any grant application/award that may relate to the site.) If you need any further advice, please do not hesitate to contact Sport England using the contact details below. Thank you for the above consultation and invitation to comment on the Draft Neighbourhood Plan. Historic England has no adverse comments to make upon the draft plan which we feel takes a suitably proportionate approach to the main historic environment issues pertaining to Audley. We commend the commitment in the Plans vision, aims and Policies to support development that is sensitive and sympathetic to the built character of the area and afford protection to its rural landscape character and green spaces. The use of Design Codes will no doubt prove invaluable as a context and guide for future development. Beyond those observations we have no further substantive comments to make. I hope you find this advice helpful.	Comment noted.
National Gas 20 Nov 23		National Gas Transmission has appointed Avison Young to review and respond to Neighbourhood Plan consultations on its behalf. We are instructed by our client to submit the following representation with regard to the current consultation on the above document.	Comment noted.

Organisation	Page no/ Policy	Representation	Response
National Grid Electricity 20 Nov 23		About National Gas Transmission National Gas Transmission owns and operates the high- pressure gas transmission system across the UK. In the UK, gas leaves the transmission system and enters the UK's four gas distribution networks where pressure is reduced for public use. Proposed sites crossed or in close proximity to National Gas Transmission assets An assessment has been carried out with respect to National Gas Transmission's assets which include high- pressure gas pipelines and other infrastructure. National Gas Transmission has identified that it has no record of such assets within the Neighbourhood Plan area. National Gas Transmission provides information in relation to its assets at the website below. • https://www.nationalgas.com/land-and-assets/network- route-maps Please also see attached information outlining guidance on development close to National Gas Transmission infrastructure. Distribution Networks Information regarding the gas distribution network is available by contacting: plantprotection@cadentgas.com National Grid Electricity Transmission has appointed Avison Young to review and respond to local planning authority Development Plan Document consultations on its behalf. We are instructed by our client to submit the following representation with regard to the current	Comment noted.
		consultation on the above document.	

Organisation	Page no/ Policy	Representation	Response
		About National Grid Electricity Transmission National Grid Electricity Transmission plc (NGET) owns and maintains the electricity transmission system in England and Wales. The energy is then distributed to the electricity distribution network operators, so it can reach homes and businesses. National Grid no longer owns or operates the high-pressure gas transmission system across the UK. This is the responsibility of National Gas Transmission, which is a separate entity and must be consulted independently. National Grid Ventures (NGV) develop, operate and invest in energy projects, technologies, and partnerships to help accelerate the development of a clean energy future for consumers across the UK, Europe and the United States. NGV is separate from National Grid's core regulated businesses. Please also consult with NGV separately from NGET. Proposed development sites crossed or in close proximity to NGET assets: An assessment has been carried out with respect to NGET's assets which include high voltage electricity assets and other electricity infrastructure. NGET has identified that it has no record of such assets within the Neighbourhood Plan area. NGET provides information in relation to its assets at the website below. www2.nationalgrid.com/uk/services/land-and-development/planning-authority/shapefiles/	

Organisation	Page no/ Policy	Representation	Response
	Toncy	Please also see attached information outlining guidance on development close to NGET infrastructure.	
		Distribution Networks Information regarding the electricity distribution network is available at the website below: www.energynetworks.org.uk	
Natural England 23 Nov 23		Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development. Natural England is a statutory consultee in neighbourhood planning and must be consulted on draft neighbourhood development plans by the Parish/Town Councils or Neighbourhood Forums where they consider our interests would be affected by the proposals made. Natural England does not have any specific comments on this draft neighbourhood plan. However, we refer you to the attached annex which covers the issues and opportunities that should be considered when preparing a Neighbourhood Plan and to the following information. Natural England does not hold information on the location of significant populations of protected species, so is unable to advise whether this plan is likely to affect protected species to such an extent as to require a Strategic Environmental Assessment. Further information on	Comment noted.

Organisation	Page no/ Policy	Representation	Response
		protected species and development is included in Natural England's Standing Advice on protected species. Furthermore, Natural England does not routinely maintain locally specific data on all environmental assets. The plan may have environmental impacts on priority species and/or habitats, local wildlife sites, soils and best and most versatile agricultural land, or on local landscape character that may be sufficient to warrant a Strategic Environmental Assessment. Information on ancient woodland, ancient and veteran trees is set out in Natural England/Forestry Commission standing advice. We therefore recommend that advice is sought from your ecological, landscape and soils advisers, local record centre, recording society or wildlife body on the local soils, best and most versatile agricultural land, landscape, geodiversity and biodiversity receptors that may be affected by the plan before determining whether a Strategic Environmental Assessment is necessary. Natural England reserves the right to provide further advice on the environmental assessment of the plan. This includes any third party appeal against any screening decision you may make. If an Strategic Environmental Assessment is required, Natural England must be consulted at the scoping and environmental report stages. For any further consultations on your plan, please contact: consultations@naturalengland.org.uk.	
The Coal Authority 27 Nov 23		The Coal Authority is a non-departmental public body sponsored by the Department for Energy Security and Net Zero. As a statutory consultee, The Coal Authority has a duty to respond to planning applications and development	Comment noted.

Organisation	Page no/ Policy	Representation	Response
	Policy	plans in order to protect the public and the environment in mining areas. Our records indicate that within the identified Neighbourhood Plan area there are recorded coal mining features present at surface and shallow depth including: mine entries, coal workings, reported surface hazards and extraction of coal by surface mining methods. These features pose a potential risk to surface stability and public safety. It is noted however that the Neighbourhood Plan does not propose to allocate any new sites for future development and on this basis the Planning team at the Coal Authority have no objections to, or specific comments to make, on this document.	
Newcastle under Lyme Planning Policy 27 Nov 23		NuLBC wishes to place on record that it commends the Steering Group, Parish Council & residents of Audley on the extent of engagement undertaken as well as the significant time, thought, effort and resource that has been invested by all involved. The approach to those issues (as referred to in Section 1.4 Other Actions) that are beyond the parameters of the Neighbourhood Plan are also to be applauded. The Council are keen to develop and maintain a close working relationship with Audley Parish Council to ensure issues are addressed and that both the Neighbourhood	

Organisation	Page no/ Policy	Representation	Response
		Plan & existing / emerging Local Plan documents are produced in general conformity with each other. The specific comments raised below are presented under the relevant Chapter/Section headings of the Neighbourhood Plan.	
	Introduction Section 1.3 Monitoring and Review	Introduction Section 1.3 Monitoring and Review: At the time of writing, changes to the NPPF are anticipated and once published, the Neighbourhood Plan should carefully consider its content where relevant to the Plan's production and application.	NPPF paragraph numbers checked and amended as necessary.
	Background and Context Section 2.4: Overall Planning Strategy	Background and Context Section 2.4: Overall Planning Strategy – it is suggested that a footnote is included within the first sentence of paragraph 2 that refers to the latest published Local Development Scheme (LDS) & the current timeline for adoption of the Local Plan. Specific aspects of allocations etc. will be considered under the relevant headings below. Local Development Scheme 2023-2026 (newcastle-staffs.gov.uk)	Deleted the word 'adopted' and replaced with text to refer to the NULBC Local Plan website.
	Section 2.6: Aims	Section 2.6: Aims – careful consideration should be given to how these aims align with the Basic Conditions as prescribed by paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990 and listed in planning practice guidance:- Neighbourhood planning - GOV.UK (www.gov.uk) and with strategic policy specifically, particularly in aspects such as Green Belt.	The aims have been edited for clarity.

Organisation Pag		Representation	Response
	E c c c c c c c c c c c c c c c c c c c	The LPA has through its recently consulted upon Reg.18 Draft Local Plan (with accompanying evidence base) made clear its stance regarding the need for and scale & distribution of growth which it is considered presents the exceptional circumstances to necessitate the release of and that is currently designated as Green Belt. This includes areas within the Audley Rural Neighbourhood Area. As such, we recognise that the (Neighbourhood) Plan is being prepared during a period in which a Borough-wide Local Plan is also emerging and the Parish Council should give careful consideration to the interactions between the two in preparing their Plan. To aid this process, thought could be given to the value of undertaking a Health Check assessment by qualified independent parties to provide advice on any potential amendments required to ensure the basic conditions are met.	Throughout the preparation of the Plan, Audley Parish Council supported by the Audley Rural Neighbourhood Plan Steering Group have maintained a good dialogue with officers at NULBC to avoid disparities between the two emerging plans. The Plan has also been prepared with support from Planning Consultants. In addition, the Basic Conditions Statement that forms part of the Plan submission sets out how the Plan meets all of the Basic Conditions, including general conformity with the adopted Local Plan.
	J	Housing Section 3.1. Purpose – In the absence of allocations within	Green Belt amendments can only
		he Neighbourhood Plan (2.4) & the stated position re:	be made through the local plan
		Green Belt protection in 2.6, more clarity could be provided	process. For a Neighbourhood
		on how it is envisaged that these various aspects of the	Plan to make detailed
		Plan align? Perhaps the inclusion of allocations could be	amendments, an adopted Local

Page no/ Policy	Representation	Response
	revisited, especially given the housing needs issues that are highlighted & the role and prospective value of identifying allocations in Neighbourhood Plans is made clear at various points within Planning Practice Guidance Neighbourhood planning - GOV.UK (www.gov.uk)	Plan would first need to make explicit provision for this. In addition, revisiting site allocations would not be possible at this stage.
Section 3.2 Planning Rationale	Section 3.2 Planning Rationale – A separate sub-heading should be included that covers the progression of the Local Plan up to its current point & should highlight the LDS timelines referred to in the comments made to Section 2.4 above. Audley Rural Housing Needs Assessment – More clarity & explanation could be provided to elucidate why despite the housing figure seemingly changing substantially between 2021 & 2023 (noting that the last release of the outputs of the 2021 census from the ONS are not until the winter of 2023), the specific housing need figures have not altered accordingly and now equate to the vast majority of what is anticipated to be delivered over the Neighbourhood Plan period. This in itself would bring into question the deliverability of a major facet of the Plan. The disparity of the plan periods (2020-2040 in the case of the Local Plan & 2022-2042 of the Neighbourhood Plan) could also have implications in drawing together the housing numbers at 250 over the 20 year periods. Recognition also needs to be made as to the distinction between the scale & distribution of growth advocated in the Local Plan (which may be subject to change following a review of consultation responses, updated evidence, and ultimately, tested for soundness at a future examination)	Subheading and text added to refer to the emerging Local Plan (and in later policy rationales). Planning rationale also updated to better reflect position in relation to housing need and delivery. The Audley Green Belt Review, August 2022 identified that "Infill opportunities and unimplemented planning permissions account for approximately 121 houses." Due to green belt constraints, it is not possible for the Neighbourhood Plan to make housing site allocations. Therefore, it is accepted that the Neighbourhood Plan alone would not meet housing need so site allocations would need to be made in the emerging local plan.

and the policy off technical calculations that are used to formulate a figure within the objectively assessed calculation. Policy ANP1: Residential Development - Points 1 & 2 - See comments above re: strategic policy alignment & deliverability. Whilst acknowledging the focus on these areas, it does present a narrow basis for support to development (within the context of their current extent), especially given that to date there's no clear analysis to suggest that there are sites available (brownfield or otherwise) within the settlement boundaries (as presented) that could yield the stated housing figures. Given this, recognition should be made in the Interpretation section stating that the settlement boundaries may alter to reflect the position reached upon the adoption of the Local Plan, including areas which are currently designated as Green Belt. Point 6c (of ANP1) — Balconies are more typical of tall buildings, so this reference may not be relevant to the settlements & prospective development within the neighbourhood plan area. Economy	Organisation	Page no/ Policy	Representation	Response
stating that the settlement boundaries may alter to reflect the position reached upon the adoption of the Local Plan, including areas which are currently designated as Green Belt. Point 6c (of ANP1) – Balconies are more typical of tall buildings, so this reference may not be relevant to the settlements & prospective development within the neighbourhood plan area. Balconies are sometimes used in 2-storey residential buildings and even at ground floor level.	Organisation	Policy ANP1: Residential	and the policy off technical calculations that are used to formulate a figure within the objectively assessed calculation. Policy ANP1: Residential Development - Points 1 & 2 - See comments above re: strategic policy alignment & deliverability. Whilst acknowledging the focus on these areas, it does present a narrow basis for support to development (within the context of their current extent), especially given that to date there's no clear analysis to suggest that there are sites available (brownfield or otherwise) within the settlement boundaries (as presented) that could yield the stated housing figures. Given this,	The Audley Green Belt Review, August 2022 referred to above did consider capacity within the settlements. It is clearly not true to say there has been 'no clear analysis'. NULBC Officers are aware of this report and there have been numerous previous
			stating that the settlement boundaries may alter to reflect the position reached upon the adoption of the Local Plan, including areas which are currently designated as Green Belt. Point 6c (of ANP1) – Balconies are more typical of tall buildings, so this reference may not be relevant to the settlements & prospective development within the neighbourhood plan area.	2-storey residential buildings and
		Fconomy	Economy	

Organisation	Page no/ Policy	Representation	Response
		The Council consulted on a number of strategic location(s) in the First Draft Local Plan. These are sites where no decision has been made on their inclusion (or not). There is a strategic location highlighted within the Draft Local Plan (Site ref: AB2) falls within the neighbourhood plan area. Whilst no decision has been reached as to its inclusion as an employment allocation within subsequent iterations of the Local Plan, it is important to be conscious that this may in due course present issues in terms of strategic alignment and the Steering Group are urged to be conscious that they may need to evaluate the implications of this accordingly. Interpretation – Consideration should be given to impacts on amenities being referred to as significantly adverse/excessive and/or not appropriately mitigated	Audley Parish Council is aware of site AB2 and objected to the proposed site allocation in response to the consultation in August 2023, setting out the negative implications of the proposal. Clause 2 of the policy already says 'significant adverse impacts'.
	Policy ANP3: Audley Village Centre (Church Street	Policy ANP3: Audley Village Centre (Church Street) – refer to vitality (as well as the already mentioned viability) to align with Section 7 of the NPPF	The policy already refers to 'vitality'. 'Viability' also added to clauses 1, 3 and 4.
	Design & Heritage	Design & Heritage Through their role as a consultee, Historic England will be well placed to advise on the heritage aspects, & subject to their views it may be worth exploring (if you haven't already done so) the available resource from them (see link below) on neighbourhood planning & referring to this	Comment noted.

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		directly as part of the rationale for this section of the Neighbourhood Plan. Neighbourhood Planning and the Historic Environment Historic England	
	Policy ANP4: Sustainable Design	Policy ANP4: Sustainable Design – Point 1 is unclear as to what is meant by 'proportionate to the scale & nature of the development', so consider rewording this aspect to clarify intent & for ease of application in the development management process. Interpretation – for the paragraph on Design and Access Statements include in brackets 'submitted with Planning Applications'.	Paragraph added to interpretation to clarify. Text added to interpretation.
	Policy ANP7: Heritage	Policy ANP7: Heritage – Clarify extent of surrounding areafor instance, confined to those surrounding areas in that fall within the boundaries of the defined neighbourhood area. As appropriate, include more explanatory text to this effect in the Implementation section	Text added to interpretation.
	Green Environment Figure 6.6: Strategic Green Gaps	Green Environment Figure 6.6: Strategic Green Gaps – It's unclear as to the justification for their inclusion, especially given the extent of Green Belt (of which avoiding coalescence of settlements is a key function). As referred to in the text (p59) under the heading of Audley's Rural Design Codes, the area also contains an array of both statutory and non-statutory environmental designations. There is also no clear argument presented that there is a substantive heightened risk from development of coalescence, along with any consequent erosion of distinctive character and	The importance of the gaps is evidenced in the AECOM, Audley Rural Design Codes. Maintaining the separation of settlements is an explicit purpose of green belts. Identification of these gaps in Audley is therefore helpful in the application of Green Belt policy. Policy ANP9 augments national

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		landscape setting within the areas where the Gaps are highlighted. Therefore, it may be worth reflecting on whether you consider that the practical application of such a policy stance would not stand up to scrutiny in the determination of development proposals. On this basis, whilst there could be value in retaining these for information & contextual purposes within the Neighbourhood Plan, it should not be assumed that they would provide any additional layer of protection beyond what the statutory designations (such as Green Belt) provide at present.	and local policy, providing a locally specific dimension.
	Policy ANP9	This argument is also relevant to Policy ANP9 , bullet Point 2 & the maintaining of separation between settlements. Figure 6.10: Local Green Spaces across the neighbourhood area – With reference to paragraph 102 of the NPPF any designations need to be demonstrably special & whilst this is alluded to in Section 2.4, the Local Green Space Designation audit is valuable in making a more explicit case by case basis detailing the rational for each site being considered demonstrably special & holding a particular local significance. It is important, nonetheless, that in each circumstance (based on the list under Policy ANP11) you are confident that the additional designation is necessary and would serve a useful purpose. It is also	The policy rationale refers to the Local Green Space background document which refers to the NPPF criteria.
		important to engage with any owners of the land in question. The Health Check highlighted above will be valuable in these regards. The approach to the use of Best & Most Versatile agricultural land should look to consider point 6 of the Draft	The draft local plan appears not to be available on the NULBC website. The interactive policy map for the emerging local plan does not show policy PSD4 in the Neighbourhood Area. As drafted,

Organisation	Page no/ Policy	Representation	Response
		Local Plan Policy PSD4: Development Boundaries and the Open Countryside to achieve consistency of approach.	policy ANP11 accords with NPPF policy. Throughout the preparation of the Plan, Audley Parish Council supported by the Audley Rural Neighbourhood Plan Steering Group have maintained a good dialogue with officers at NULBC to avoid disparities between the two emerging plans. The Plan has also been prepared with support from Planning Consultants. In addition, the Basic Conditions Statement that forms part of the Plan submission sets out how the Plan meets all of the Basic Conditions, including general conformity with the adopted Local Plan.
	Infrastructure Section 7.2: Planning Rationale Policy ANP12	Infrastructure Section 7.2: Planning Rationale – Include reference to the Infrastructure Delivery Plan which forms part of the Local Plan evidence base. Local plan evidence base – Newcastle-under-Lyme Borough Council (newcastle-staffs.gov.uk) Policy ANP12: For bullet point 2, the role of transport assessment & travel plans will be significant determinants of impacts & mitigation, so this should be referenced	This is a very strategic level document with no specific mention of Audley and of little relevance to policy ANP12. Text added to interpretation.

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	Green Development Guidance Note Section 8.2: Green Building Design	Green Development Guidance Note Section 8.2: Green Building Design - Generally such approaches are to be welcomed, but there may be circumstances where viability means that aspects of these could not be reasonably achieved. Given this, site specific considerations will be important factors in the degree of flexibility that should be applied & highlighted in the text accordingly. Furthermore, some of these technologies/methods may not be suitable for historic and older areas by virtue of reasons including aesthetics & engineering difficulties and this would be worth	The status of the green guidance note is stated at the beginning. It is intended as guidance rather than policy.
	Section 8.3: Biodiversity	Section 8.3: Biodiversity – Guidance on this nationally is still emerging & advisories from Natural England and Defra could be valuable reference points. In January 2024, there is also a mandatory requirement for implementation of Biodiversity Net Gain by local authorities which you may wish to highlight as a footnote.	Section 6.2 already makes reference to the requirements for biodiversity net gain.
	Consultation Infographics	Consultation Infographics These messages are acknowledged & recognised. It is also assumed that, where appropriate, this information reflects that presented in the main body of the Neighbourhood Plan.	The policies were informed by the outcomes of community engagement.
United Utilities Water Limited 27 Nov 23		Thank you for your consultation seeking the views of United Utilities Water Limited (UUW) as part of the Neighbourhood Plan (NP) for Audley. UUW wishes to build	Comments noted.

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		a strong partnership with neighbourhood groups to aid sustainable development and growth.	
		Allocations for New Development Following our review of the NP, we note that there are no site-specific allocations for new development above and beyond those already identified in the wider development plan for Newcastle-under-Lyme which is currently under review. If this were to change, we would request early dialogue so that we can inform the site selection process and ensure any issues that are a concern to us are highlighted to you as early as possible.	
		Our Assets It is important to outline the need for our assets to be fully considered in any proposals in the NP Area. UUW will not allow building over or in close proximity to a water main. UUW will not allow a new building to be erected over or in close proximity to a public sewer or any other wastewater pipeline. This will only be reviewed in exceptional circumstances. Site promoters should not assume that our assets can be diverted. On occasion, an asset protection matter within a site can preclude delivery of a proposed development. It is critical that site promoters / applicants engage with UUW on the detail of their design and the proposed construction works. All UUW assets will need to be afforded due regard in the design process for a site. This should include	

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	Tolley	careful consideration of landscaping and biodiversity	
		proposals in the vicinity of our assets and any	
		changes in levels and proposed crossing points (access	
		points and services).	
		We strongly recommend that the LPA advises future	
		applicants / promoters of the importance of fully	
		understanding site constraints as soon as possible, ideally before any land transaction is negotiated, so	
		that the implications of our assets on development can be	
		fully understood. We ask site promoters to	
		contact UUW to understand any implications using the	
		below details:	
		Developer Services – Wastewater Tel:	
		03456 723 723	
		Email: SewerAdoptions@uuplc.co.uk	
		Developer Services – Water Tel:	
		0345 072 6067	
		Email: DeveloperServicesWater@uuplc.co.uk	
		Sustainable Design	
		UUW notes the importance of climate change and the	
		wider issues associated with the climate emergency. A	
		critical element of the response to climate change is	
		sustainable surface water	
		management and the efficient use of clean water supply.	
		Sustainable surface water management, in the form of sustainable drainage, is identified as a key issue in the	
		consultation outputs for your NP. We wish to ensure that	
		the NP gives appropriate emphasis to designing new	
		development so that it is resilient to the challenges of	
		future climate change, such as, multi-functional	
		sustainable drainage, avoidance of flood risk, natural flood	

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		management techniques and the incorporation of water supply efficiency measures. We are supportive of Section 8.4 which references sustainable drainage and the need for this to be incorporated into the landscape design. We are also supportive of hard surfaces being water permeable. Whilst being supportive of these elements of the emerging NP, we recommend that the NP includes a comprehensive policy on foul and surface water management. This is because control over the management of surface water is a critical response to the challenge of climate change. Sustainable surface water management helps to control the flows and volumes of surface water that enter the public sewer and therefore are an inherent component of reducing the likelihood of discharges into the regions watercourses from sewer overflows. Our example sustainable drainage policy is set out below and we recommend that you include this in your NP. 'Sustainable Drainage – Foul and Surface Water All applications must be supported by a strategy for foul and surface water management. Surface water should be discharged in the following order of priority: i. An adequate soakaway or some other form of infiltration system. ii. An attenuated discharge to a surface water body. iii. An attenuated discharge to public surface water sewer, highway drain or another drainage system. iv. An attenuated discharge to public combined sewer. Proposals should be designed to maximise the retention of surface water on-site and minimise the volume, and rate of, surface water discharge off-site.	Suggested policy goes beyond the scope of planning policy. Sewerage infrastructure is a matter for the utility provider. Sewers in development would be dealt with under building regulations. Surface water is already dealt with in national policy and local plan policy. ANP4 supports climate resilient development. The Green guidance note includes reference to Sustainable Drainage Systems (SuDS). An additional policy at this stage would involve a need to repeat the Regulation 14 consultation.

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	Policy	On greenfield sites, any rate of discharge shall be restricted to a greenfield run-off rate. On previously developed land, applicants must also follow the hierarchy for surface water management and target a reduction to a greenfield rate of run-off. Proposals on previously developed land must achieve a minimum reduction in the rate of surface water discharge of 30% rising to a minimum of 50% in any critical drainage area identified by the SFRA. To demonstrate any reduction, applicants must submit clear evidence of existing operational connections from the site with associated calculations on rates of discharge. Where clear evidence of existing connections is not provided, applicants will be required to discharge at a greenfield rate of run-off. The design of proposals must assess and respond to the existing hydrological characteristics of a site to ensure a flood resilient design is achieved and water / flooding is not deflected or constricted. Applications for major development will be required to incorporate sustainable drainage which is multifunctional, in accordance with the four pillars of sustainable drainage, in preference to underground piped and tanked storage systems, unless, there is clear evidence why such techniques are not possible. The sustainable drainage should be integrated with the landscaped environment and the strategy for biodiversity net gain. For any development proposal which is part of a wider development / allocation, foul and surface water	
		biodiversity net gain. For any development proposal which is part of a wider	

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		Pumped drainage systems must be minimised and a proliferation of pumping stations on a phased development will not be acceptable. Applications must be accompanied by drainage management and maintenance plans including a plan for any watercourse within the application site or an adjacent watercourse where the application site is afforded riparian rights.	
		Explanatory Text Application of the hierarchy for managing surface water is a key requirement for all development sites to reduce flood risk and the impact on the environment. Clear evidence must be submitted to demonstrate why alternative preferable options in the surface water hierarchy are not available before discharging surface water to the public sewer. Foul and surface water drainage must be considered early in the design process. Sustainable drainage should be integrated with the landscaped environment and designed in accordance with the four pillars of sustainable drainage (water quantity, water quality, amenity and biodiversity). It should identify SuDS opportunities, including retrofit SuDS opportunities, such as green roofs; permeable surfacing; soakaways; filter drainage; swales; bioretention tree pits; rain gardens; basins; ponds; reedbeds and wetlands. Any	Section 8.4 amended to include an edited version of this text.
		drainage should be designed in accordance with 'Ciria C753 The SuDS Manual', sewerage sector guidance, or any subsequent replacement guidance.	Suggested policy goes beyond the scope of planning policy. This

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	Section 8.4:	The hydrological assessment of the site must consider site topography, naturally occurring flow paths, ephemeral watercourses and any low lying areas where water naturally accumulates. Resultant layouts must take account of such circumstances. Applications will be required to consider exceedance / overland flow paths from existing and proposed drainage features and confirm ground levels, finished floor levels and drainage details. Drainage details, ground levels and finished floor levels are critical to ensure the proposal is resilient to flood risk and climate change. It is good practice to ensure the external levels fall away from the ground floor level of the proposed buildings (following any regrade), to allow for safe overland flow routes within the development and minimise any associated flood risk from overland flows. In addition, where the ground level of the site is below the ground level at the point where the drainage connects to the public sewer, care must be taken to ensure that the proposed development is not at an increased risk of sewer surcharge. It is good practice for the finished floor levels and manhole cover levels (including those that serve private drainage runs) to be higher than the manhole cover level at the point of connection to the receiving sewer. Holistic site-wide drainage strategies will be required to ensure a coordinated approach to drainage between phases and between developers. Applicants must demonstrate how the approach to drainage on any	appears to relate to building regulations. An additional policy at this stage would involve a need to repeat the Regulation 14 consultation. The green guidance note already mentions water efficiency including rainwater capture, storage and re-use.

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		phase of development has regard to interconnecting phases within a larger site with infrastructure sized to accommodate interconnecting phases. When necessary, the holistic drainage strategy must be updated to reflect any changing circumstances between each phase(s). The strategy shall demonstrate communication with infrastructure providers and outline how each phase interacts with other phases.'	This appears to relate to the activities of the service provider, rather than planning policy for developers.
		We also wish to suggest the following explanatory paragraph to section 8.4: Sustainable surface water management and the efficient use of water are critical elements of the design and development process. Sustainable surface water management should be at the forefront of the design process and linked to green/blue infrastructure, landscape design and biodiversity. Green infrastructure can help to mitigate the impacts of high temperatures, combat emissions, maintain or enhance biodiversity and reduce flood risk. Green / blue infrastructure and landscape provision play an important role in managing water close to its source.	
		Water Efficiency Building Regulations Part G includes an optional standard for water efficiency of 110 litres per person per day (I/p/day) for new residential development which can be implemented through local planning policy where there is a	

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		clear need based on evidence. In this regard, we have enclosed evidence prepared by Water Resources West to support the adoption of the Building Regulations optional requirement for local authorities in North West England and the Midlands. We therefore recommend the inclusion of the following additional wording in the emerging NP regarding water efficiency. This could be included as an additional policy in the NP: 'All new residential developments must achieve, as a minimum, the optional requirement set through Building Regulations Requirement G2: Water Efficiency or any future updates. All major non-residential development shall incorporate water efficiency measures so that predicted per capita consumption does not exceed the levels set out in the applicable BREEAM 'Excellent' standard. Where the 'Excellent' Standard cannot be achieved, evidence must be submitted with an application to the satisfaction of the local planning authority. The BREEAM 'Very Good' standard must be met as a minimum.'	
		We wish to highlight that improving water efficiency makes a valuable contribution to water reduction as well as carbon reduction noting that water and energy efficiency are linked. We also wish to note the associated societal benefits by helping to reduce customer bills. New Policy – Supporting Utility Infrastructure UUW wishes to highlight that it owns assets outside the settlement boundaries. This includes Audley Wastewater	

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		Treatment Works. The area of the NP is also the location	
		for water and wastewater infrastructure in the form of our	
		water supply and sewer networks. Investment associated	
		with our water and wastewater infrastructure is influenced	
		by a number of drivers including the construction of new	
		facilities to take account of new environmental	
		requirements, growth,	
		the need to respond to the carbon challenge, or the need	
		to invest in new updated infrastructure. In our next	
		investment period (2025-30), we are proposing the biggest	
		investment in water and wastewater services across the	
		North West in over 100 years. Our recent submission to	
		Ofwat proposes £13.7 billion of planned investment	
		between 2025-30. The drivers for this investment include the Environment Act	
		2021, which has set a requirement to progressively reduce storm spills into the environment. Such investment will be	
		constrained by engineering circumstances to determine	
		the most appropriate location for additional storage to	
		reduce	
		spills. This may necessitate investment in constrained	
		locations in our urban and rural environments such as	
		in/on land in protected locations such as local green	
		space, open countryside and green belt. Consistent with	
		meeting this obligation, UUW requests that the NP	
		includes support for investment in water and wastewater	
		infrastructure that is ultimately beneficial to the	
		environment, biodiversity and our watercourses so it can	
		be delivered in the most timely and effective manner.	
		Specifically, we request that policy supports investment in	
		our infrastructure in constrained locations such as local	

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		green space, open countryside and green belt. Our recommended policy wording is: 'We will support water and wastewater infrastructure investment which facilitates the delivery of wider sustainable development and the meeting of environmental objectives of water and sewerage undertakers including development proposals for water and wastewater infrastructure in protected areas such as the Green Belt, open countryside or in existing local green spaces, where the investment is needed to respond to future growth and environmental needs.'	
		Summary If you have any queries or would like to discuss this representation, please do not hesitate to contact me at planning.liaison@uuplc.co.uk.	
Staffordshire County Council Received after deadline -		Thank you for the opportunity to comment on your plan and I apologise for the late submission. Please find attached response to your Neighbourhood Plan. Please note the sites that Staffordshire County Council maintain an objection to as noted in our previous response	These comments were received after the deadline so have not been taken into account. Similar comments were made at an earlier stage and were given rigorous consideration.
	ANP11 Local Green Space – Site 56	 dated October 22. Barthomley Road Pond - Site 56 is within SCC Title Audley Estate Holding No. 13 a Tenanted Smallholding 	

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		under a private agreement for occupation which is not public or deemed green space.	
		As per our previous objection October 2022, SCC maintain our objection to the inclusion of the land parcel (Site 56) as Greenspace.	
	ANP11 Local Green Space – Site 69	Alsagers Bank Academy (Formerly Richard Heathcote Primary) - Site 69 is within SCC Title - The Richard Heathcote Community Primary School (now known as Alsager Bank Primary Academy).	
		The Primary School is an Education Asset held specifically for the use of the School and as such maybe required for school expansion.	
		The land is also protected by S77 which controls its change of use and land disposal.	
		School Standards and Framework Act 1998 (legislation.gov.uk)	
		As per our previous objection October 2022, SCC maintain our objection to the inclusion of the land parcel (Site 69) as Greenspace.	
	ANP11 Local Green Space – Site 72	Wood Lane Primary School - Site 72 is within SCC Title and Church owned land - Wood Lane Primary School.	

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		Wood Lane Primary School is an Education Asset held specifically for the use of the School and as such maybe required for school expansion.	
		The land is also protected by S77 which controls its change of use and land disposal.	
		School Standards and Framework Act 1998 (legislation.gov.uk)	
		As per our previous objection October 2022, SCC maintain our objection to the inclusion of the land parcel (Site 72) as Greenspace.	
		(Note no other objections in relation to other green spaces – see Appendix for further detail)	

Table 2 - Residents and Landowners

Respondent Reference	Page no Policy/ Site Ref	Representation	Response
		Residents and Landowners	
Res 1 15 Nov 2023		I enjoyed reading the plan cover to cover. It was very comprehensive. I don't think it could have been presented any better with the infographics, aerial photos, logo, layout - very impressive! There was a lot covered - some of it naturally contradictory - like people saying more parking needed but not losing any green spaces. Needing more housing but then feeling that none of the specific size housing was needed. I'm glad it covered public transport and cycling, and better access to fitness. Also consideration to suitable accommodation for the elderly I'm guessing the intention was never to offer solutions - that would be up to the council to propose? Again, thanks for letting me have a copy. I enjoyed it and it will be a great reference to keep!	Comments noted.
Res 2 15 Nov 2023		As detailed, the Local Plan, being part of the overall statutory development plan with Newcastle-under-Lyme Borough Council, should identify how many new homes are required and where these new sites would be allocated. (Including employment sites as well as other types of development). It goes on to state that the Audley Rural Neighbourhood Plan (ARNP) specifically reflects the needs and wants of the Parish Community and will be used along with the NUL Local Plan to inform planning decisions for the Parish of Audley. My comments, although it has been suggested within the 'Update Leaflet 2023' that any responses should be referred to specific page numbers or policy references accordingly, do	These comments appear to relate to the Newcastle-under-Lyme Local Plan, rather than the Audley Rural Neighbourhood Plan.

Respondent Reference	Page no Policy/ Site Ref	Representation	Response
		actually appear to merge into different categories for which I apologise at the outset. Background and Content	
		Following on from the Newcastle-under-Lyme Borough Council and Stoke-on-Trent City Assessment Final Reports, The Neighbourhood Plan Steering Group, which convened in April 2021, ensured that the analysis of the issues concerning the local community were taken into consideration regarding development within the area. It is apparent that currently there is; (a) Insufficient off-road parking causing potential safety hazards for pedestrians and congestion upon the highways in general. (b) A poor bus service which has now been exacerbated by First Bus removing the service from Audley, via Wood Lane, to Waterhayes. (c) A concern over protecting the rural character by losing any open spaces, given to any development, which keeps the villages separate. Basically a strong concern that greenbelt land will be used for future developments. (d) All of the primary schools are almost at capacity and there being only one senior school situated within the Parish.	Comments noted.
		Housing It states that new residential development should have; Screened storage space for bins and recycling which are positioned away from street frontages. Secure screened storage spaces for scooter and cycles with electric charging points. Electric charging points for electric vehicles.	Comment noted.

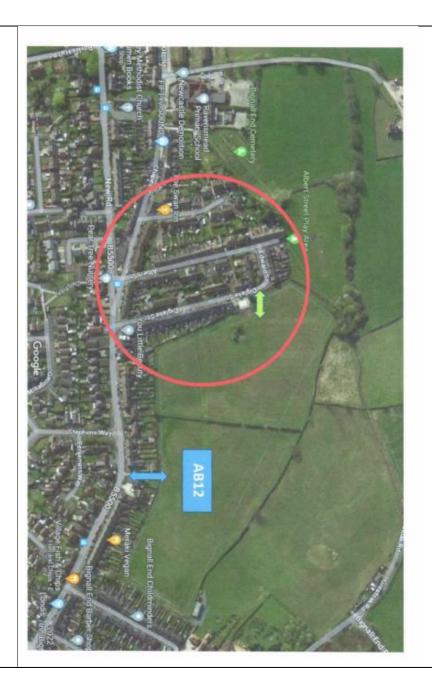
Respondent Reference	Page no Policy/ Site Ref	Representation	Response
		Ignoring the "Utopian Vision' for new homes, as detailed in the residential development aspect of the ANHP, The Government has apparently also suggested that OPP will be made easier for developers to build homes to achieve The Government's unachievable target of 300,000 new homes a year. (This has now been downgraded to 100,000).	
		Yet there are more than a million, that's right, ONE MILLION new homes yet to be built on land already earmarked for development by numerous councils.	This appears to relate to National Government policy.
		The LGA (Local Government Association), which represents councils, says this is further evidence that councils are allocating enough land to deliver a housing pipeline for many years ahead and that planning is not a barrier to building the homes the country desperately needs.	Comment noted.
		The LGA is calling for the Government to introduce measures to tackle a "broken" housing delivery system and to give councils (who have already given OPP) the powers to incentivise developers to bring allocated sites forward without delay or intervene where development has stalled. (Or in some cases the building has not even begun). This could include making it easier to compulsory purchase land where homes remain unbuilt and to be able to charge developers full council tax for every unbuilt development that is not built out to agreed timescales.	Comment noted. This appears to relate to National Government policy.

Respondent Reference	Page no Policy/ Site Ref	Representation	Response
		Yet we have the situation in Newcastle-under-Lyme where we have areas without the necessary infrastructure for developers to build and make a satisfactory profit but which have been formally identified as suitable for housing by the council through the Local Plan Process.	This comment appears to relate to the Local Plan.
		With regard to the housing realities the Borough Council has deemed it a good idea to potentially release green belt land to allow over 7,000 homes to be built following out of date 2014 projections. This, coupled with a falling population within Newcastle Borough and the fact that housebuilding has exceeded the increase in households in the last 10 years, makes this arbitrary decision of 7,000 extra homes irrational in the extreme. To finalise I have paraphrased Darren Rodwell of the LGA in	Green belt release would be done through the Local Plan. This is not proposed in the Neighbourhood Plan.
		the following paragraph: The houses aren't being built because the developers are profiting from the fact that they receive an outline, or full, planning permission and the land value is greatly increased from that point on. But mainly, and I specifically include Bignall End and Audley, the developers just want the land as they have no intention of building homes as the infrastructure is not sufficient to make the houses appealing, or profitable, as they would need to develop any such infrastructure accordingly. (ie Schools, GP Surgeries, Drainage, Roads, Public Transport Links, to name but a few).	The Neighbourhood Plan does not allocate sites for housing.

Respondent Reference	Page no Policy/ Site Ref	Representation	Response
		6 Green Environment The Audley Design Code makes clear the importance of the natural and rural landscape as a significant characteristic of the Neighbourhood Area. It goes on to state; "The Neighbourhood area is host to an array of both statutory and non-statutory environmental designations. This comprises the network of green spaces, water bodies, biodiversity habitats and other natural elements. All of these spaces need to be well maintained to ensure they continue to meet the needs of the local people, as well as the animal and plant species within its ecosystem. The Neighbourhood area's open countryside is a defining feature of its landscape character, making it all the more important to preserve such areas where possible. A majority of these spaces fall within the Green Belt, adding an extra layer of protection to these locally and naturally important spaces."	Comment noted. Policies ANP9 and ANP10 deal with the natural environment and landscape and green infrastructure. Policy ANP11 designates Local Green Space.
		Following on from the Newcastle-under-Lyme Borough Council and Stoke-on-Trent City Council Green Belt Assessment Final Reports this went on to state; The purpose of the Green Belt Assessment was to provide the Councils with an objective, evidence based and 'independent' assessment of how the Green Belt contributes to the five purposes of Green Belt as set out in the National Planning Policy Framework (NPPF). Each General Area was assessed against the five purposes of Green Belt, as set out in paragraph 80 of the NPPF:	This appears to be unrelated to the Neighbourhood Plan.

Respondent Reference	Page no Policy/ Site Ref	Representation	Response
Reference	Policy/ Site Ref	In essence: "The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open. The essential characteristics of Green Belts are their openness and permanence". The findings of the final assessment report resulted in; "The green belts within the Parish therefor make a STRONG CONTRIBUTION in preventing the unrestricted sprawl of large built-up areas, prevents neighbouring towns merging into one another, assists in safeguarding the countryside from encroachment and preserves the setting and special character of the Parish.' We are one of the most nature depleted Countries on Planet Earth and the reasons for this decline are abundantly clear.	The Neighbourhood Plan does not allocate the sites
		Yet again it has been suggested that areas, where wildlife friendly farming could be expanded and thereby improving the 'carbon sinks', should be considered to be built upon which is not very pro-active with regard to climate change issues. (AB2 AB12 & AB33 being specific areas in question). Green Environment (Pollution Potential & Public Health)	not allocate the sites mentioned. The Parish Council objected to site AB2 in the last Local Plan consultation. The Neighbourhood Plan does
		What does not appear to have been mentioned within the ARNP is the impact on public health issues should any developments be allowed to go ahead.	address health and well-being, for example in policies relating to design, green infrastructure and active travel.

Respondent Reference	Page no Policy/ Site Ref	Representation	Response
		Air pollution is one of the major environmental issues in the UK, with impacts occurring at the national, regional and local scale as well as affecting the health and wellbeing of residents.	
		Road traffic is the most significant source of pollution within the Borough of Newcastle-under-Lyme. Certain areas within the Borough have been identified for their exceedance in Nitrogen Dioxide (NO2) which is associated with car exhaust fumes. Breathing in high concentrations of NO2 can irritate and inflame the airways and lungs, with those suffering with respiratory diseases (i.e. asthma) being particularly effected. For a specific example please refer to the attached plan showing the potential building plot described as AB12. Diglake Street, Edwards Street, Albert Street and the suggested access points marked in blue arrows. There would be a severe air quality issue (within the red circle at the very least) due to the excessive increase in vehicular traffic (and corresponding increase in NO2) throughout the side streets which, even now, struggles with the amount of vehicular traffic used by residents of the streets.	This appears to relate to the wider Newcastle-under-Lyme Borough and to the Local Plan.
		In conclusion it is apparent that any building of further homes, within a rural area, would have a detrimental effect upon the air quality within Audley and Bignall End.	The Neighbourhood Plan proposes very limited housing development within the existing built areas. The Plan does not make housing site allocations.



New Road B5500 (Secondary Access) Area that will suffer with excess NO2 should the development be allowed due to excessive vehicular traffic in the three mid-terraced side streets	LEGEND Diglake Street (Primary Access)	

Respondent Reference	Page no Policy/ Site Ref	Representation	Response
RES 3 23 Nov 23	ANP1 Residential Development	Needs a more detailed housing survey. The numbers quoted in the ANP are way above what is needed. Please see accompanying letter.	Housing need was identified in the AECOM Audley Rural Housing Needs Assessment, November 2021 (updated October 2023).
	ANP2 Business and Community Facilities	Very much against the proposed warehouse/employment development at AB2. Please see accompanying letter. Existing local businesses should be encouraged.	The Neighbourhood Plan does not allocate site AB2. The Parish Council objected to the proposed allocation of AB2 through the Local Plan process.
	ANP3 Audley Village Centre (Church Street)	The traffic situation in Audley is difficult but manageable. However, if proposed developments in the local plan get the green light, the situation will become impossible.	This appears to relate to the Local Plan and not the Neighbourhood Plan.
	ANP4 Sustainable Design	Favour sustainable design.	Comment noted.
	ANP5 Audley Conservation Area	Conservation areas should remain exactly that. No significant changes needed.	The Conservation Area is already designated. The policy sets requirements for development against the context of national policy and guidance.
	ANP6 Character of Settlements	The character of all the settlements as rural villages should remain. Audley Parish does not need urbanisation as would be the case under the local plan.	Policies ANP4, ANP5 and ANP6, deal with design and character. ANP9 protects the

Respondent Reference	Page no Policy/ Site Ref	Representation	Response
			rural environment including separation of settlements.
	ANP7 Heritage	All heritage features should be preserved where possible.	Comment noted.
	ANP8 Shopfronts	Shopfronts should have their historic character preserved where possible. I am not qualified to say if any warrant some graded listing.	Comment noted.
	ANP9 Natural Environment and Landscape	The natural environment should be preserved at all costs. The world is in a climate crisis and the landscape in the neighbourhood acts as a significant carbon sink. Therefore the large developments proposed in the local plan are highly undesirable.	Comment appears to relate to site allocations in the Local Plan.
	ANP10 Green Infrastructure	I am in favour of any preservation or improvement of green infrastructure. It is assumed that this includes footpaths, bridleways and cycle lanes, providing access to our neighbouring green spaces.	Comment noted. Footpaths, bridleways and cycleways are dealt with in policy ANP12. ANP4 Sustainable design amended to include a clause on protecting the amenity, access and safety of green and other public spaces.
	ANP11 Local Green Space	Local green spaces designated green belt should be preserved at all costs. I am aware that this conflicts with the local plan.	Local Green Spaces would have similar protection to green belt.

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	ANP12 Transport and Active Travel	Especially an improved bus service would not be missed, given the recent cuts to the No. 4 route.	The Parish Council would support additional bus services but this is outside of the scope of the Neighbourhood Plan.
	ANP13 Local Energy Generation	I am all in favour of local green energy generation. Onshore wind is now the cheapest source of power in the UK. This would be considerably more desirable than the proposed employment site at AB2.	Comment noted.
		Accompanying letter: As you will no doubt be aware, there are two main issues of concern within the local community regarding the prospect of substantial overdevelopment within the Audley Parish. These include a proposed strategic employment site on AB2 at Park End, which is rightly viewed in a negative light, and I am pleased that this is reflected in the neighbourhood plan document. The other issue is housing, which I fear is not adequately dealt with in the neighbourhood plan. The 2011 and 2021 censuses show an approximate 1% reduction in the population of the neighbourhood area over the intervening period. Yet the neighbourhood plan effectively reiterates figures from the local plan on their view of housing need, which in turn is based on national trends and statistics and not on local need. This appears to be how the figure of 250 new homes is arrived at in the neighbourhood plan, most of which would need to be built outside settlement boundaries on green belt land. To me, this is not an acceptable state of affairs and the Parish Council should have taken a stronger view on housing, backed up with evidence from a neighbourhood housing survey of the residents. Without such	The letter appears to relate to housing site allocations in the Local Plan rather than policies in the Neighbourhood Plan.

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		a more detailed survey it is difficult to be precise on what is needed locally, but I certainly do not agree that 250 new homes are needed. And I feel that there is no need to build outside settlement boundaries or on green belt. If we are basing figures on national statistics, then Parish Council should be aware that there are 1.5 million more dwellings than households in England and Wales, and to use this as a firm starting point. It is likely that as the local population ages, a small number of 'affordable' properties, 1-2 bedrooms say, may be needed to be built within settlement boundaries. This is bearing in mind that the upcoming revised NPPF indicates that no local authority should be forced to release green belt land for housing, especially if, as in our case, the borough has already exceeded recent housing targets. Another point is that of the 250 new homes suggested, only 30% (75) will be affordable. Of the breakdown given in the neighbourhood plan, 68 will be 1-bedroom, none with 2-bedrooms. It is my contention that we are only likely to need the 68 1-bedroom properties with the remaining seven as a mixture of 2 and 3-bedroom dwellings, provided that any 3-bedroom properties are sold at locally affordable prices. The other 175 properties that would not be affordable to locals, are not needed. What should be borne in mind is that houses are for people and not for investors. If there is not a sufficient population to occupy them, then they are not needed.	Affordable housing requirements are set out in the Local Plan.

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RES 4 26 Nov 23	ANP1 Residential Development	My issue with the current Neighbourhood Plan (NP) is mainly in this area. The plan seems to focus on handling the numbers of housing being proposed as a fait accompli. I believe that the majority of the residents in Audley and surrounding villages, do not want to lose the green belt on this scale but the plan seems to be trying to soften the impact of the impending building by breaking the numbers down into how many will be built each year which seems unrealistic and frankly confusing as to why any housing figures are used in the NP in the first place. The use of the figures is frankly conceding to the Local Plan (LP) figures which is not helpful.	The Neighbourhood Plan does not and cannot amend the green belt boundary. It does not allocate sites for housing. The emerging Local Plan proposes four site allocations for 270 houses. The AECOM HNA takes this into account and identifies an overall need of 275 new homes. Unless the Neighbourhood Plan identifies that it is meeting housing need as set out by NULBC, there is a risk that the tilted balance could apply, which could allow speculative housing development on greenfield sites. This would be an unacceptable risk for the Parish Council. Planning rational amended to clarify this (see NPPF Paragraph 14).
	ANP2 Business and Community Facilities	I agree that the local Business and Community Facilities should be supported. This should be a more imminent response and not to support a massive warehouse on the edge of our village (AB2) which will not benefit its residents at all. In fact the impact on the environment will be devastating. We need to look at sustainability and removing great swathes	The Neighbourhood Plan does not include the allocation of site AB2. The Parish Council objected to the proposed allocation of AB2 through the Local Plan process. The

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		of greenbelt land will fly against this ideal. Why is this issue not in the plan?	Neighbourhood Plan is not a tool for making representations on the Local Plan.
	ANP3 Audley Village Centre (Church Street)	Church Street is already a traffic nightmare at the moment, so with the prospect of extensive building in the future, the village will not be able to cope. Why is this issue not in the plan? Surely the NP should be representative of the people of Audley?	The Neighbourhood Plan cannot require developers to address existing traffic management issues. However, policy ANP12 requires the cumulative impacts of developments to be considered to ensure there is no severe impact on road capacity and safety.
	ANP4 Sustainable Design	This whole section could be about anywhere. It looks like a copy and paste and could apply to any village in the country. Where is the section on how it applies to our village?	ANP4 deals with sustainable development and is applied together with ANP5 and ANP6 both of which address Audley's specific character. The policies should be read collectively.
	ANP8 Shopfronts	The shop fronts while important to the image of the village, pale into insignificance to the proposed building on the greenbelt around our countryside	Comment noted.
	ANP9 Natural	Once again, this section lacks an on the ground position of	The Neighbourhood Plan does
	Environment and	residents in the village. If we lose our natural environment and	not and cannot propose building
	Landscape	landscape due to building on the greenbelt then the impact on our village life will be catastrophic. Where I live, my road is used as a route for dog walkers and horse riders to access the countryside which is a massive contributor to peoples	on the Green Belt. Policy ANP9 protects different aspects of the rural environment.

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	ANP10 Green Infrastructure	positive mental health. Again, not featured in any depth in the NP There seems to be a disparity between the Government's stand on Biodiversity Net Gain (BNG) which is a strategy to only develop land that contributes to the recovery of nature and the LP's insistence on using prime greenbelt land to build on. It would have been good here to have the NP make clear its stance in relation to this disparity.	The Neighbourhood Plan does not and cannot propose building on the Green Belt.
	ANP12 Transport and Active Travel	As bus services are cut, the need for more cars and taxis will be needed. Why is this issue not in the plan?	The Neighbourhood Plan promotes sustainable and active travel.
	ANP13 Local Energy Generation	I am very pro green energy and would see this a better alternative to the massive proposed warehouse at AB2	The Neighbourhood Plan does not include the allocation of site AB2. The Parish Council objected to the proposed allocation of AB2 through the Local Plan process. The Neighbourhood Plan is not a tool for making representations on the Local Plan.
		Reflection Overall, the NP seems to have been produced to run in line with the LP and lacks teeth to stand up for our villages and greenbelt. To my mind, the NP should do the opposite and there is an opportunity to put forward some strong recommendations, based on local public feeling, that would	The Basic Conditions against which Neighbourhood Plans are tested sets out the relationship with the adopted Local Plan. The Neighbourhood Plan

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		add rigour to the LP. I strongly advice a revision to the NP to at least give a more authentic view on the feelings of the residents in the villages.	policies have been based on evidence and the outcomes from community engagement.
RES 5 26 Nov 23		Our NP should be protecting our greenbelt and helping to save the land and stop any overdevelopment within the Parish. The NP doesn't seem to address this it seems to follow the Local Plan from the council and national statistics and not the local need as per your own questionnair to the villagers.	The Neighbourhood Plan does not make housing or employment site allocations. It caters for housing development through infill within existing settlements.
		The NPPF indiciates that no local council should be forced to release greenbelt land for housing, especially as there are exceptional circumstances in our case, the borough has exceeded the recent housing targets and there have been more deaths than births in our borough.	The Neighbourhood Plan does not and cannot propose the release of green belt land.
		Housing in this area, should be for local people and not outside investors. What the village needs i.e. 1 and 2 bedroom properties, enabling our elderly residents to downsize to free up family homes and the young villagers able to get onto the housing market. We do not have the capacity to have 4-5 bedroom homes (for potential commuters working in Manchester and Birmingham) all the extra traffic of more than 2+ cars per property, the community infrastructer is not in place.	The Neighbourhood Plan supports 1-bed, 4-bed and housing suitable for older people as evidenced in the AECOM Housing Needs Assessment.
		The possibility of the large warehousing by AB2 is devastating. This is not needed for employment for the villagers. There is employment opportunities already in warehousing throughout this borough and the neighbouring	The Neighbourhood Plan does not include the allocation of site AB2. The Parish Council objected to the proposed

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		areas. Do not lose the greenbelt for concrete bases. Let the NP support the views of the villagers and fight to keep our greenbelt, our starter farms, our countryside. Protect the village from more pollution, more traffic, unsafe lanes and village centres.	allocation of AB2 through the Local Plan process. The Neighbourhood Plan is not a tool for making representations on the Local Plan.
		Stop the parking on pavements, make Church street safe.	Traffic management falls outside of the scope of the Neighbourhood Plan.
		There is so much more detail needed in the local plan. Where are these cycle routes planned for , the lanes are our cycle routes, these large developements will lose the possibility for me to access safe routes. The lanes and countryside is the reason we moved to Audley.	The Neighbourhood Plan does not propose new cycle routes but does require development to support active travel.
		It helps so many people with their mental health to have the countryside on the doorstep.	Comment noted.
		Audley needs to be kept rural and avoid any large developments. Help to save our village from what the Local Plan has in store for the Parish.	Policy ANP9 seeks to protect the rural environment.
RES 6 26 Nov 23	ANP11 Local Green Space (Site Ref 91 Land in front of Wall Farm House)	Without prejudice, i take great exception to any one or any group who thinks it is their business to try and make decisions that may effect my personal property. As stated to the parish council before plot 91 in your local green space designation does not form part of Wall Farm it is a privately owned piece of land forming part of Wall Farm House.	Local Green Space designation does not enable public access where there is none. Land in private ownership without public access can be designated. Applying the assessment criteria of the Staffordshire

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		It has no public access, no public rights of way and it does not meet the majority of the criteria to be included in LGS besides which, it is already protected because of it's green belt statues and LGS designation has no more clout than the green belt. I have very strong views on this matter and will be taking them to Newcastle Borough Council in due course.	Farmsteads Assessment Framework, February 2015 prepared by Historic England (formally called English Heritage) and Staffordshire County Council it appears to form part of the historic farmstead as it is within the walled boundary of the farm. The purpose of green belt is different from Local Green Space designation. The Map of 1898 clearly shows the space forming part of the historic farmstead of Wall Farm. Text added to the interpretation of policy ANP7 to make reference to farmsteads. Local Green Space description amended to make reference and include extract of the 1898 map of Audley.
RES 7 27 Nov 23		I am a resident of above, commenting as such. References to other information to inform on ANP plan used in this section Draft Local Plan 2023-2040/ Sustainability Appraisal/ Habitats Regulation Draft Local Plan 2023-2040/ Housing requirements: Section 14 approach to strategic allocation and housing & section 15 Residential & employment	This appears to make reference to the Local Plan rather than the Neighbourhood Plan.

Respondent Reference	Page no Policy/ Site Ref	Representation	Response
	3.3 ANP1 POLICY DETAIL Residential Development Items 1-8+ interpretation p21-p27, Ref to: Housing rational ANP Policy 3.1-3.2 p.17- 20 and all associated tables	Relating too:AB12, AB15, AB32 & AB33 also AB2, AB12, AB15, AB32, AB33 & TK30 and all other developments in the Audley Rural Neignbourhood Plan (ANP) Some housing small scale will be required for local residents in the future. Such as low cost 1-2 bedroom houses for young people and small families and elderly people who wish to move to smaller accommodation (thus freeing up stock). These will need to be social (not private rental as this will be too expensive, see national trends) or low cost /1st time buyers. There will be no benefit in building 4/5 bedroom dwellings which will be high cost and only attract outside residents who would travel work and shop outside the area. The population has in fact reduce and the age demographics show an aging population (Census 2021) despite more house building.	The Neighbourhood Plan supports 1-bed, 4-bed and housing suitable for older people as evidenced in the AECOM Housing Needs Assessment. Affordable housing requirements are dealt with by the Local Plan.
	and maps	Regarding building on the green belt once an area has been built on industrial, warehousing and /or housing) then a cascade of other developments happen (New Farm Development being a good example of this possible problem if agreed). Look at the creep of housing around the Congleton bypass recently and areas of Alsager, and loss of greenbelt. Historical evidence of the overspill from cities to towns and rural areas have produced major developments along motorways such as the M3/A303 (London overspill 1960's) leading to very poor housing built by councils requiring major refurbishment, before time at get public expense (ref Greater London Councils and overspill towns). Towns and villages becoming dormitory in nature loss of historical sites, farmland and greenbelt, trading estates that are now currently rundown	The Neighbourhood Plan does not and cannot propose the release of green belt land.

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		or not at capacity before time, services unable to meet needs (re Basingstoke & Andover Hampshire) and its villages' re-London overspill. Note this is relevant modern planning problems and old planning mistakes. Because Audley is in danger of becoming a garden village over time once this process begins for the M6 corridor for Birmingham Manchester. The current services such as doctors, dentist and school in the local villages are at or near capacity. Bus services have been cut. I have seen little evidence of how these services would be upgraded other than vague comments at local consultations and public meetings (is there an independent assessment of options available?), especially in the current economic situation as the government has little money for infrastructure. The traffic environment will be radically affected as traffic from the above mentioned sites will mingle with current traffic along narrow roads and junctions in Audley and Bignall End, especially access to and from AB12/AB15	Comment noted. Comment noted the Neighbourhood Plan supports new and/or expanded community facilities. This appears to relate to site allocations in the Local Plan. The Neighbourhood Plan does not make housing or employment site allocations. It caters for housing development through infill within existing settlements.
		The projections for housing appear to be using the 2014 data when there is much more current data available regarding population figures that show less housing is required and the current 5 year supply can be modified if the will exists. Does this all need to be so rushed to get the plan sign sealed and delivered?	The AECOM Housing Need Assessment takes account of the 2021 census data. This comment may relate to the Local Plan, rather than the Neighbourhood Plan.

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		Regarding local housing and employment With any new houses it is the big developers who would get the major would and local builders would not really benefit. Most local residents' are in the middle and low income bracket and travel. What are the published (and independent) figures to show how many would work locally and be able to afford 4/5 bedroom houses (very few if any?).	The Neighbourhood Plan only accommodates very small-scale development and does not make site allocations.
		Summary (also relevant to next section) * Strategically we are in a potential Manchester overspill/ dormitory travel area. With Crewe /Alsager/Congleton/parts of Stoke –On-Trent along the M6 corridor. (as was North Hampshire with the London Overspill). This is not good news for greenbelt land or sustained well paid employment and low cost quality housing in the population centres (such as Stoke –on-Trent, & Crewe as housing supply and employment are all moving out creating dead spaces, brown field sites and dereliction, these population's need regenerating and employment. However Hedge funds and big business generally avoid these areas and look at easy to develop sites (or some sort of taxpayer funded subsidy for brown field sites) for the most return. The data given for projected housing needs numbers appears to be based on the National housing formula, therefore	This comment may relate to the Local Plan, rather than the
		averages, rather than what is actually needed at a local level survey? We don't have to release green belt for housing. Therefore I cannot support ANP1 as it does not fully reflect the requirements of the local area.	Neighbourhood Plan. The AECOM Housing Need Assessment is based on the standard methodology as set

Respondent Reference	Page no Policy/ Site Ref	Representation	Response
		*Strategically we are in a potential Manchester overspill/ dormitory travel area. With Crewe /Alsager/Congleton/parts of Stoke –On-Trent along the M6 corridor as (was North Hampshire with the London Overspill). This is not good news for greenbelt land or sustained well paid employment and low cost quality housing in the population centres (such as Stoke –on-Trent, & Crewe as housing supply and employment are all moving out creating dead spaces, brown field sites and dereliction, these population's need regenerating and employment. However Hedge funds and big business generally avoid these areas and look at easy to develop sites (or some sort of taxpayer funded subsidy for brown field sites) for the most return.	out by DLUHC, applied to all Housing Needs Assessments for neighbourhood plans across England undertaken as part of the national programme. The Audley HNA, takes account of the 2021 census data. Policy ANP1 supports infill and redevelopment within the existing settlements. It does not and cannot propose the release of green belt land.
	ANP2 Business and Community Facilities	One does have to question why we need so much warehousing type sites in such close proximity. Newcastle Under Lyme is a net exporter of jobs (mainly to Stoke-on Trent). We have new warehouse/industrial sites along the A500 opposite ASDA on the fowl lea brook and currently a	The Neighbourhood Plan does not propose warehousing along the A500. This comment appears to relate to the Local Plan.

Respondent	Page no	Representation	Response
Reference	Policy/ Site Ref		
	4.3 ANP2	new multi-million pound Enterprise Zone, Chatterley Valley	
	POLICY DETAIL	West, with apparently a projected 1700 Jobs. (Which has now	
	Business and	has come to a halt due to financial issues). A site proposed at	
	Community	the Red Street Talke (TR30 1st, Draft Local plan	
	Facilities	consultation). A truly massive site proposed at J16/M6 (AB2	
	4 Economy 4.1-	1st, Draft Local plan consultation). Also there is a proposed	
	4.2 P29-31, Info	extension to the Alsager warehouse scheme (Radway Green),	
	Graphics p30-31	as extra to the current ones which are empty. Crewe west has	
	4.3 Business &	a scheme (H2S dependant?). Stone has a large area with	
	Community	industrial and warehouse sites, and Stafford has warehousing,	
	Facilities Items 1-	(which is rapidly expanding north towards Stone). All these	
	3 +interpretation	are not distant plans that will have little or no impact on	
	p33	Audley its residents, environment and greenbelt. All the above	
		really needs independent scrutiny and clarification of real	
		requirements.	
		Very little seems to have been thought out about how existing	In fact, policy ANP2 explicitly
		small rural businesses and new small start- ups will thrive.	supports business, agricultural
		The finding from the local community seem to support small	diversification, live-work units
		agricultural / farming businesses using existing infrastructure.	and community facilities in the
		This may generally provide low to mid income jobs. Both	area.
		seasonal and permanent, and also protect and enhance the	
		use of farm land in a green and sustainable way.	
		Use of existing space such as Townhouse Farm for small hi-	
		Tech/ It or small workshops (This site did in the circa 1989-92	
		have small working units with electronics and materials,	
		students from Crew and Alsager College of Higher Education	
		visited it for advice, ideas and materials), The Old bank in	
		Church street upper floor could be used to. This may	
		generally provide mid to high income jobs. This type of	
		farming/business would allow for, local employment and	
		housing (at a sustainable level).	

Respondent Reference	Page no Policy/ Site Ref	Representation	Response
		It must be noted that in the infographics (Business Survey, Figure 4.2, Extracts from Community Engagement Spring 2022, Page 30-31) Audley Neighbourhood Plan Audley Rural Parish Council States OVER HALF of businesses said development of green belt was not important to business growth. Does this mean: the business is quite happy to remain at its site to expand or possibly move if it gets bigger? Or If an outside investor they are not really going to be worried about local concerns? As the next page Rural Enterprise and Local Economy Page 31 Audley Neighbourhood Plan Audley Rural Parish Council Clearly shows, the local population want sustainable local employment, and protected greenbelt (97%) a number which can't be ignored	The Neighbourhood Plan does not and cannot propose the release of green belt land.
		Summary a) Are so many warehouses viable in such a small area (Stafford, Stone, Stoke, Crewe, Alsager). Where is independent supporting evidence? b) How many will be value jobs, not temporary, zero hour, unskilled? c) How do we know what the overall strategic employment sites are, and why so many are required? Where is independent supporting evidence? d) Is this really a co-ordinated strategic plan (or get as much in as possible regardless of need)?	See previous comments above, including reference to site AB2 in the emerging Local Plan and that the Neighbourhood Plan does not make site allocations.

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		e) Will the buildings be rented, from Hedge funded investment companies, leading to little tax revenue for the Authority? f) What risk analysis and accountability has been taken to ensure the local authorities (i.e. tax payer) is not at a Hugh financial risk in such difficult times. (example Rugley Amazon ware house now closed, is it too big/ requires modifications to be of use to anyone, therefore redundant? g) Little though appears to have been given for rural small industry (existing or new), small start - ups or business to thrive? h) Warehousing provides very few well paid jobs, many zero hour jobs and temporary contracts, massive car parking and travel requirements for staff, and will provide little if any material benefit to the area in the ANP document i) Small local farming, helps develop a strategic food supply and green belt management, provides employment at many different skill levels. j) Small business/start- ups,(using modified infrastructure) provide space to grow and then move to an urban location k) Noise, traffic, vehicle, light and building pollution will damage the area l) Loss of habitat will be enormous on the land m) Loss of greenbelt and greenspaces will be detrimental to the environment and artificial landscaping will not replace centuries of habitat development. n) Building these commercial sites on green sites (especially AB2) will deny, inner city brown field sites more suited to this type of employment the chance to develop and	

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		employ people that would not have to travel very far in the city and also reduce travel and pollution o) See also a section 1 summary I am very much against this type of development in a rural and semi- rural location.	
	ANP3 Audley Village Centre (Church Street) 4.4 ANP3 POLICY DETAIL Audley Village Centre (Church Street).Items 1-4 + interpretation' P34-35	Currently Church Street is different things to different people at various times of day. But a general themes appears to be. A couple of dining establishments' that have a good amount of business and appear to enhance the area and wider custom A pub which is keeping to traditional standards and developing. A drinks an off licence shop, (customers ignore parking restrictions frequently, causing traffic issues). We have in the Audley, Bignall End & Halmer End areas possibly too many fast food outlets. Two supermarkets, (again street parking is frequently ignored by many using one of them again causing traffic issues) We do have a hardware shop which is well used, We are very lucky to have an excellent (but very busy) Health Centre) and Pharmacy, as well as a very good dentist, all of which we can ill afford to lose. And good library and a Theatre. We used to have a Butcher (that was highly regarded), a clothes shop and High street building society. Very infrequent bus service Out of town shopping, and internet, possibly have reduced the choice and viability of key shops. However there could be a creep towards businesses that only pop up for a short time, ie sweetshop/ balloons/party shops,	Comments noted.

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		which may not last very long in the current economic climate, leaving un- cared or derelict premises, as well as providing little to enhance the local shopping experience. Gradually Church Street has begun to look untidy and not well kept, partly due to a confusing look to frontage between Super markets and Off- License, which has had the effect of removing some of the areas character. The white alms houses really need to be refurbished (are these listed). Litter from take away or off – licensed or supermarkets is a problem as it not only is found in Church Street, but on the surrounding roads, hedges and footpaths (easily up to a mile away). Car parking is generally ok (Friday nights can be hectic though), Could do with more electrical charging points to comply with current need to reduce use of Petrol vehicles. We appear to have a very small police presence generally in the Audley rural plan area, in Church Street it is very surprising that cameras' installed on lamp post appear to have not visible effect on the amount of poor parking and law breaking even though it is pointing along Church street.	
	ANP4 Sustainable Design 5.3 ANP4 POLICY DETAIL Sustainable Design, Items 1-6 + interpretation,P48	Regarding interpretation of sustainable design, ('Design and Access statements provide an opportunity to demonstrate how the requirements of this and other policies have been met. Strong encouragement is given to engagement with the Parish Council and the local community from early stages of the design process from ANP P48'). Many residents will not or cannot respond to planning and design meetings as they are too short a notice, difficult, time consuming and complex to respond to, and therefore excluded due to these constraints, leaving the few who can to respond for the many to organise a	Comment on short notice meetings passed to NULBC for information.

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		response and perhaps not getting ideal solutions. (From ANP P 48). In the last consultation it was extremely difficult to access the correct website. 'Use of independent design review is encouraged for larger or more complex schemes, or in locations with design sensitivity. Compliance with the policy will be easier to achieve 'How is the choice of independent design review taken, Who? gets to have an input from the local community as well as the selection of independent advice to get as broad a picture of what is required? 'if care is taken over the selection of skilled and experienced design professionals.' How is this selection and accountability of this process achieved to ensure, group think does not occur. Who reviews the balanced out comes?	Independent Design Review should be additional to engagement with the local community.
	ANP5 Audley Conservation Area 5.4 ANP5 POLICY DETAIL Audley	All historical and listed buildings/structures need to be preserved, and any future developments need to be in character with the area. As noted Church Street has lost some of its character due to poor thought given to premises design in some cases.	The Neighbourhood Plan seeks to address design quality in general, also with a specific policy on the conservation area.
	Conservation Area 1a-h + interpretation p49	Any refurbishment, or new developments also need to be modern, environmentally sound and sustainable for local needs mainly. Though must also be given to Audley area with its rich history and develop it as a travel destination for visitors to North Staffordshire. A visitor centre (Millennium Green/ pensioners hall /Library?) run by volunteers could provide maps (use of heritage trails linking up the wider area through paths, bridal ways, cycleways etc.), display places of interest in the local	Comments noted.

Respondent Reference	Page no Policy/ Site Ref	Representation	Response
		area , café, social hub links. A good bus service or park and ride, Talke pits or drop offs and then use paths. (Important above section to be read in conjunction with ANP7 Heritage 5.6 ANP7 POLICY DETAIL Heritage, Item 1-2 + interpretation)	
	ANP6 Character of Settlements 5.5 ANP6 POLICY DETAIL Character of Settlements Items 1a-e + interpretation P50	Please read comments in the following sections for response ANP 5, ANP7, ANP8, ANP10 ANP7 Heritage 5.6 ANP7 POLICY DETAIL Heritage. Item 1-2 + interpretation P51 Also read in conjunction with ANP5 Audley Conservation Area Areas that would enhance Heritage Linked cycle paths, Bridleways, footpaths between local site in each village and also linking Stoke – on – Trent (Talke Pits) , & Newcastle Under Lyme, (via Apedale). Improve Millennium Green by introducing a small visitor centre at the hall (this could be for the whole area and has good parking for cars and coaches for any visitor. Millenium Green, is possibly much older than medevil times and an archaeological dig may discover it is bronze age or earlier. (this would generate interest) Further expand the mining heritage by linking up with Apedale museum Ensure no big developments destroy the surrounding area and view (AB2, TR32/33 etc. Ensure buildings comply with the local character Refurbish/tidy up Church street/ Bignall End and area to make them look more like rural villages and not another non – descript village with struggling shops, and pubs.	Comments noted.

Respondent Reference	Page no Policy/ Site Ref	Representation	Response
		(Important above section to be read in conjunction ANP5 Audley Conservation Area 5.4 ANP5 POLICY DETAIL Audley Conservation Area1a-h + interpretation p49)	
	ANP8 Shopfronts 5.7 ANP8 POLICY DETAIL Shopfronts, Item 1-3 + interpretation P52-53	Gradually Church street has begun to look untidy and not well kept, partly due to a confusing look to frontage between the two supermarkets and Off licence, which has had the effect of removing some of the areas character. The white alms houses really need to be refurbished (are these listed?). Litter from take away or off – licensed is a problem as it not only is found in Church Street, but on the surrounding roads, hedges and footpaths (easily up to a mile away).	The Neighbourhood Plan seeks to improve design quality including shopfronts.
	ANP9 Natural Environment and Landscape 6.3 ANP9 POLICY DETAIL Natural Environment and	Draft Local Plan 2023-2040/ Sustainability Appraisal/ Habitats Regulation Draft Local Plan 2023-2040/ Housing requirements: Section 14 approach to strategic allocation and housing & section 15 Residential & employment Relating too:AB12,AB15,AB32 & AB33 also AB2, AB12, AB15, AB32, AB33 & TK30 and all other developments in	These are references to the Local Plan. The Neighbourhood Plan does not make site allocations.
	Landscape Items 1-6 + interpretation P62-63	the Audley Rural Neignbourhood Plan (ANP) Environment and natural landscape, impact of AB12, AB15, AB32 &, AB33 Major traffic problems from noise, parking and road use Pollution from more traffic, c02 emission's, rubber, brake dust damage to roads. Further loss of greenspace, hedges and trees	The policy seeks to protect the natural environment and landscape.

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		Increased risk of sewage discharge/s due to current sewerage sites future capacity Pollution of water ways Loss of insect, birds and animal habitat. Light pollution More use of energy and resources,	
		AB2 Major traffic problems from noise, traffic volume and road use Pollution from more traffic, c02 emission's, rubber, brake dust damage to roads. Large vehicles using roads. Significant loss of greenspace, hedges and trees. Farm land and agricultural infrastructure (given we need to grow more UK food as we are only 60% approx. self - sufficient.) Increased risk of sewage discharge/s due to current sewerage sites future capacity Supply to site of electrical and other energy needs Pollution of water ways Loss of insect, birds and animal habitat. Light pollution More use of energy and resources, Note: especially with the above AB2 and TR30 sites, landscaping and provision of ponds and trees will provide little to replace the impact of removing ancient hedges, trees and bio/ habitat infrastructure. Building that are on site easily cancel any overall wildlife/ biodiversity schemes benefit. Lack of linked up routes for wild life to cross areas and thrive, These routes would provide areas for a wide range of wildlife	The Neighbourhood Plan does not include the allocation of site AB2. The Parish Council objected to the proposed allocation of AB2 through the Local Plan process. The Neighbourhood Plan is not a tool for making representations on the Local Plan.
		to thrive. Note from your own surveys in the ANP a large number of residents have major concerns about how these	The Neighbourhood Plan does not make housing or

Respondent Reference	Page no Policy/ Site Ref	Representation	Response
		developments will impact the area and region. Do we have an independent impact assessment of all of these proposed schemes and developments before you proceed. Do you actually need to proceed???	employment site allocations. It caters for housing development through infill within existing settlements.
	ANP10 Green Infrastructure 6.4 ANP10 POLICY DETAIL Green Infrastructure Items 1-2 + interpretation P64-65	A clear priority should be given for the use and retention of all public foot paths, cleared and maintained. Rural routes such as c roads, cycle paths and bridley ways need to be protected and expanded. Reduction in speed (20mph) along a few limited selected routes only (to protect people and animals). Clear and protected animal corridors to allow biodiversity to increase. Protection of all green belt and related tree stock. Encourage social use of greenspace, and green belt.	Protection of existing footpaths and cycle routes is dealt within in policy ANP12, including explicit mention of the greenway, Marion Platt way and the former mineral line. Policy ANP4 Sustainable design amended to include a clause on protecting the amenity, access and safety of green and other public spaces.
	ANP11 Local Green Space 6.5 ANP11 POLICY DETAIL Local Green Space, Items 1-2 + interpretation P66-79	All local green space needs to be preserved as this provides A space to relax, walk, play, think A haven for wild life, (more important now lots of dwellings have concreted over the drives reducing biodiversity) A place that allows nature to take in carbon A place that children can play and explore nature in safety Planting of more trees required	The policy designates and protects Local Green Space. Policy ANP4 Sustainable design amended to include a clause on protecting the amenity, access and safety of green and other public spaces.
	ANP12 Transport and Active Travel 7.3 ANP12 POLICY DETAIL	We need a regular and reliable bus service to allow people to get to and from work 7 days a week. At an affordable cost.	Comment forwarded to NULBC and Staffordshire County Council.

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	Transport and Active Travel Infrastructure items 7.1 & 7.2 + rest of page p81-85 inc infographics	A bus service that allows people to shop further afield such as Talke –Pits, Stoke-on –Trent, Newcastle under Lyme, Trentham, Crew and Chester and links to rail stations Could a small mini bus service be developed in partnership for, role. Charging points at main villages carparks? Places to keep cycles safe and secure? Reduced speed limits on a few selected country lanes, where walkers, cyclist and horse riders may be (not wide spread as this may cause more pollution).	Cycle storage is dealt with in policies ANP1 and ANP12.
	ANP13 Local Energy Conservation 7.4 ANP13 POLICY DETAIL Local Energy Generation Items 1-3 + interpretation P	Has any thought been given to the following,: Extracting heat from the ground via the mines to heat homes in the area. Wind farm on selected sites such as Wedgewood Monument hill (very visible) and one the opposite sides (this one would be generally out of main view), Scott Haye hills, Apedale, Black Bank as these have a prevailing westerly wind and clear view across the Cheshire gap.	The interpretation recognises geo-thermal from mine shafts. A wind farm on the Wedgewood Monument hill would harm the setting of the listed monument. Policy ANP13 requires careful consideration of impacts.
	00	Important: More thought must be given to how this type of information and consultation is conducted, to allow everyone to be able to access it and respond as a lot of people will be excluded by A) How the information is presented, this Draft Audley Rural Neighhour Hood plan is 168 pages long document which take a few reads to begin to get a grasp of what's going and what is the real issues?	The consultation was conducted in accordance with planning law and consultation case law. The Neighbourhood Plan was available in key locations and online. A summary of the Plan was sent to every household.

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		B) This is similar to the Draft Neighbourhood Plan in August which required a really good understanding of the details as well as broad ideas C) It has been difficult to understand the difference and purpose, process and timelines of both the Draft Audley Rural Neighbour Hood plan and Draft Neighbourhood Plan.	We are unsure what this refers to. There has been community engagement previously but not a formal consultation.
		D) The experience of responding to the Draft Neighbourhood Plan in August was very difficult as e-mails, and telephone advice was very time consuming as it did not work well and I finally got through just before the deadline .This experience would put many of responding to anything. E) Points A-D are real barriers to communication for a large percentage of the population, for many reasons, access, time, family commitments, ability to use technology, ease of access to drop of replies, and will result in a low turn- out figure.	There has not been a telephone advice line, unlike the Local Plan.
RES 8 27 Nov 23		My initial thoughts on the draft Neighbourhood Plan are that you have fallen into the same trap as the draft Local Plan, in that it is very lengthy and quite complex. I have read through it at least five times and still feel I don't completely get what the purpose of this document is for and if this is my view, having the benefit of being a member of PAPG, then what chance does Jo Public have.	The purpose and status of the Neighbourhood Plan is given in the introduction.
		Secondly, Jo Public still doesn't understand the difference between the Local Plan and Neighbourhood Plan.	The relationship between the plans as part of the Statutory Development Plan is given in the introduction.

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		I do find it very sad because I know how much work /commitment the steering committee have put into this document	
	ANP1 Residential Development	Having said that, my views on the following policies are as follows: ANP1 Residential Development I believe that what is required is a Housing Needs Study based on what Parish residents want and not to advocate using the draft Local Plan's proposed number of 270, It looks to me like the Parish Council are basically saying that the Local Plan figure of 270 (ARNH says 250!?) as a done deal and I am not sure that the Neighbourhood Plan using annual figures is very helpful. When do developers build 5-9 houses per year – it is misleading.	The Neighbourhood Plan is based on evidence in the form of the AECOM Housing Needs Assessment. In addition, there has been extensive engagement including a householder questionnaire. A failure to meet identified housing need could make the area vulnerable to speculative housing schemes. The emerging Local Plan proposes site allocations for 270 houses. The AECOM HNA takes this into account and identifies an overall need of 275 new homes. Unless the Neighbourhood Plan identifies that it is meeting housing need as set out by NULBC, there is a risk that the tilted balance could apply, which could allow speculative housing development on greenfield sites. This would be an unacceptable risk for the Parish Council. Planning rational amended to clarify this.

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			The Neighbourhood Plan does not and cannot propose the release of green belt land.
		Folk are concerned that once some of our green belt is designated for development, it will just open the flood gates for more and more housing sites and it will urbanise our rural community.	The Neighbourhood Plan cannot duplicate national planning policy.
		There is no mention of a policy to actually protect our green belt. Why is that?	The Neighbourhood Plan does not and cannot propose the release of green belt land. There is already a rural exception sites policy in the
		Rather than allowing green belt boundaries to be altered, I wonder if anyone has explored the Rural Exception Sites policy https://www.s106management.co.uk/pages/rural-exception-sites?gad_source=1&gclid=EAlalQobChMlvMijLhggMVDobtCh0aMwntEAAYASAAEgLauPD_BwE whereby small housing sites can be built in the green belt and offered to local people at truly affordable prices.	Local Plan.
		In any event, I do not believe that 270 houses are needed in Audley Parish but realise that some housing; smaller one	The Neighbourhood Plan supports 1-bed, 4-bed and
		bedroomed properties for single folk or for the elderly to downsize to would be beneficial. If the elderly are able to downsize whilst remaining local, this will then release the bigger properties for expanding families.	housing suitable for older people as evidenced in the AECOM Housing Needs Assessment. The policy has

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			been amended to include 3-bed.
		I would also like to see a section in the Neighbourhood Plan should housing developments get the go-ahead, for any monies resulting from the likes of Section 106 are allocated to Audley Parish and that any community projects promised are built before the housing is allowed to go ahead.	Comment noted and passed to NULBC.
	ANP2 Business and Community Facilities	ANP2 Business and Community Facilities I am totally against the proposed warehousing/employment site aka AB2 at Junction 16. Our unemployment in the Parish is just 2% so this size of site is totally unnecessary and not needed. How would Audley Parish benefit from such a vast site? The site would in fact be detrimental to our Parish with increased traffic & air, noise, light pollution, the loss of beautiful countryside and our wildlife will suffer.	The Neighbourhood Plan does not include the allocation of site AB2. The Parish Council objected to the proposed allocation of AB2 through the Local Plan process. The Neighbourhood Plan is not a tool for making representations on the Local Plan.
		However, local businesses should be encouraged reflecting our rural heritage, ie starter farms?	Policy ANP2 already supports the diversification of agricultural holdings. The interpretation makes reference to flexible floor space for start-ups and creative industries.

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	ANP3 Audley Village Centre (Church Street)	The main issue with Audley Village Centre is parking and the only way to improve this situation is for people who park on double yellow lines, should be fined to deter them from doing so, however, knowing people, they will just go and shop elsewhere where they can park and our local businesses will then suffer. If NULBC build the 270 houses they are proposing then the parking problem will just increase in Audley and we will end up with an increase in illegal parking and possibly more accidents. There appears to be no mention or proposals as to what can be done to help the parking situation.	Comment passed to Staffordshire County Council Highways for information.
	ANP4 Sustainable Design	Am all for sustainable design but new homes do also need to be affordable.	Comment noted. Affordable housing requirements are set by the Local Plan.
	ANP5 Audley Conservation Area/ANP6 Character of Settlements	I agree with your views on Audley Conservation Area and that the character of all the villages in the Parish should be retained. It is also important that the villages remain separate, remain rural and not become a huge town.	Comments noted.
	ANP7 Heritage ANP8 Shopfronts	Agree Heritage sites should remain as is	Comment noted.

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		Shopfronts – too much detail on how shop fronts should be and I don't understand the logic of putting shutters on the inside of shop windows. The whole point of shutters is to prevent damage – shutters on the inside wouldn't stop malicious damage such as bricks being thrown but having said that, would prevent unwanted entry.	The policy is aimed at preserving character, whilst allowing additional security. Clause 3 deleted and guidelines moved to interpretation.
	ANP9 Natural Environment and Landscape ANP10 Green Infrastructure ANP11 Local Green Space	Am in favour of the green spaces you have designated in the Neighbourhood Plan, however, believe that more could be done with regard to integrating/linking up existing public rights of way with quiet country lanes so that all users, be it walkers, runners, horse riders or cyclists can make more use of said roads. Perhaps put speed limits on such routes to safeguard the public more and create more bridleways or at least reestablish the pathway from Peggys Bank to Apedale with a link from the Marions Way/The Lines. This would not only keep horses off the busy roads but would allow the many private livery yards in the area to thrive because of the safe riding in the area.	Comment on linking up footpaths noted. Infrastructure priorities have been added to the plan, including linking up pathways. Policy ANP4 Sustainable design amended to include a clause on protecting the amenity, access and safety of green and other public spaces.
		One other thing which is missing from the Neighbourhood Plan is to conduct a wildlife survey of the Parish in order to help protect our greenbelt land. Might it be an idea to engage Staffordshire Wildlife.	The evidence base for these policies included the Open Space and Green Infrastructure Strategy, April 2022; The Audley Rural Design Codes, May 2023; and The DEFRA interactive mapping data. We

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			think that the policy has been adequately evidenced.
	ANP12 Transport and Active Travel	We need speed restrictions on our narrow country lanes (from 60 down to 40) and an improved bus service now that Route 4 has ceased.	Comment noted. This is outside of the scope of the Neighbourhood Plan.
	ANP13 Local Energy Generation	I think all properties either old or new should be encouraged to have some form of electricity generation and that this should be aided by Government/Council grants.	The Neighbourhood Plan does encourage this in the green guidance note.
		A negative to solar panels is how they will be disposed of at the end of their life.	Comment noted however some modern models can be recycled.
		I would view wind farm electricity generation (and NOT solar panels as per above comment) on the AB2 site in preference to warehousing. I hope you find my comments of interest.	The Neighbourhood Plan does not include the allocation of site AB2. The Parish Council objected to the proposed allocation of AB2 through the Local Plan process. The Neighbourhood Plan is not a tool for making representations on the Local Plan.
RES 9 27 Nov 23		I can see that alot of time has been spent on this plan and included lots of lovely photographs of the area. Unfortunately I do feel the Neighbourhood Plan (NP) has not been as clear as it could have been.	

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	ANP 1 Residential Development	ANP1: I can't see the NP is protecting our greenbelt, it seems to be stating what type of housing to use following the Local Plan. The NP should be ensuring there is no development on green belt, that is the beauty of Audley, the rural countryside.	The Neighbourhood Plan does not and cannot propose the release of green belt land.
		Please can we have a Housing Needs Study based on what the residents of Audley Parish need. Is the Parish council agreeing with the Local plan about the housing figures instead of listening to the community of Audley? There is a decrease in the population of the borough. The NP has not taken into account its own survey sent out to residents. Audley is ageing more than the rest of the borough. I do not believe that 270 houses is the requirement for the village. Some housing is required for local people, but not larger developments. I also hope that if a development of 1 bedroom properties goes ahead it is on a bus route and good access for services that the old and young can ulitise easily. This is the time to stand upto the Local Plan (LP) and listen to the villagers, save our greenbelt. 90% against the release of greenbelt around exisiting villages, 81% felt that new employment was NOT needed in the parish. 90% against the release of greenbelt for new employment, which will not benefit the village. Starter farms and smallholdings needed. This all states that we need to protect our greenbelt. If we allow Staffs County Council to sell their starter farms land (greenbelt) AB33, what happens to the rest of the farm, does the development then grow and end up developing the whole farm area, how can you ensure this does not happen?	The emerging Local Plan proposes site allocations for 270 houses. The AECOM HNA takes this into account and identifies an overall need of 275 new homes. Unless the Neighbourhood Plan identifies that it is meeting housing need as set out by NULBC, there is a risk that the tilted balance could apply, which could allow speculative housing development on greenfield sites. This would be an unacceptable risk for the Parish Council. Planning rational amended to clarify this.

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		It is also misleading to state that it equates to 5-9 houses per year, what developer will only build 5-9 houses each year, no, they will develop the lot allocated. ANP2: What the NULBC has planned in their LP will ruin the landscape and character of this village. There isn't a need for employment sites like AB2 in the village. I don't see any mention of this. Where is the evidence?	The Neighbourhood Plan does not include the allocation of site AB2. The Parish Council objected to the proposed allocation of AB2 through the Local Plan process. The Neighbourhood Plan is not a tool for making representations on the Local Plan.
	ANP 2 Business and Community Facilities	Encourage the starter farms, not build on the fields that could be used for farming. As per your own survey. The villagers want Starter farms and small holdings and a farm shop, all mentioned in your survey. Let the NP state that we DO NOT support the large warehousing (AB2), instead support the businesses already in the village and protect our landscape. The NP needs to address this further. There is virtually no unemployment in this parish, so there is no necessity for the warehousing (AB2) for employment needs of the village. This site will destroy the countryside with light, noise and air pollution. Help to keep the carbon soaking green belt. Not to mention the added strain on, an already busy network of Main roads such as the A500 and M6	The policy already supports the diversification of agricultural holdings. The interpretation makes reference to flexible floor space for start-ups and creative industries. The Neighbourhood Plan does not include the allocation of site AB2. The Parish Council objected to the proposed allocation of AB2 through the Local Plan process. The Neighbourhood Plan is not a tool for making representations on the Local Plan.

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	ANP3 Audley Village Centre (Church Street)	ANP3 - AUDLEY VILLAGE CENTRE (CHURCH ST) More parking is required in the village already to help the local businesses and to stop illegal parking, which happens everyday. More parking would avoid the illegal/pavement parking. This is before further Development if it goes ahead. Which will make the parking even worse, and increase the parking on the pavements, it is already difficult for the elderly and pushchair users. The NP does not address this. There are too many lorries using Church street as a cut through, how can this be addressed? Again your survey says 86% would like to see more communal parking, where is the response to this?	Comment passed to Staffordshire County Council Highways for information.
	ANP4 Sustainable Design	ANP4 - Point 3 - For a safe environment for cyclist, walkers, horseriders!! Then put into the NP about protecting our country lanes. How would this good physical and mental health be possible (5.3.3a), nothing stated in the NP. There are safe routes used by many now down Park Lane, Moat Lane and others around the villages.	Policy APN12 promotes active travel. Policy ANP4 clause 3 and ANP12 clause 4 amended to make reference to horse riders. Policy ANP4 clause 3a already makes clear how the public realm can support physical and mental health. Various policies place emphasis on the historic and rural character of the area.
		The LP draft would lose these safe areas used by many. Any development on these lanes, will reduce the cycling, walking, horseriding routes, these join onto the footpaths, giving larger routes to explore. This NP does not apply to Audley, no mention of how it can protect these routes infact nothing	The Neighbourhood Plan is not a tool for making representations on the Local Plan. Policy ANP3 and ANP5 explicitly relate to Audley.

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		appropriate to Audley is listed. Where do you propose the Safe and convenient environment for pedestrians and cyclists will be - as mentioned on section 5.3.3?	Other policies also apply to the entire parish, including Audley. Footpath protection is dealt with in policy ANP12.
	ANP5 Audley Conservation Area/ ANP6 Character of Settlements	ANP5 & 6 - I agree with your views on Audley conservation area. The topography of Audley and keeping the distinctive views of the surrounding countryside does need to be protected by keeping the rolling green fields and the village settlement in keeping with the rural village it is. Fight to keep housing development low, we have a reducing population in our neighbourhood, so avoid unnecessary developments which will lose the special character of Audley Parish, help to retain the beauty of Audley.	Comment noted.
	ANP7 Heritage ANP8 Shopfronts	ANP7 - ANP8 -	No response.
	ANP9 Natural Environment and Landscape	ANP9 - (6) Development should not involve the loss of the best and most versatile agricultural land, fight to keep the greenbelt status. The NP has no mention of the proposed sites AB33, 32, 15, 12 & AB2, I would like to see the NP/Parish council wanting to protect these areas, especially because they are on greenbelt, the greenbelt status is there for this reason to stop unnecessary development. There is no exceptional circumstances for this use. Keep our starter farms, once the land has gone, the farm has too. This is part of our village, let the NP try to protect this. Encourage the borough to keep what is special about Audley. The land and roads around these areas are our playground for walkers,	The Neighbourhood Plan does not include any site allocations. The Parish Council objected to the proposed allocation of AB2 through the Local Plan process. The Neighbourhood Plan is not a tool for making representations on the Local Plan. Various policies in the Neighbourhood Plan deal with active travel and protection of

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		cyclists, horseriders, don't let these lanes become highways with lorries and more cars destroying the ruralness. Also larger developments adds pollution from losing the carbon soaking greenfields, which helps to protect the village already from the M6 & A500, which is our natural buffer.	the historic and rural environment.
	ANP10 Green Infrastructure	ANP10 - (2a-b) I would like to see more explanation of what support will be given to wildlife and nature friendly gardens. Again more detail needed, especially as the LP wants to reduce our growing possibilities by farmers, by losing the starter farms. (2c) - as mentioned previously, the NULBC LP draft does not promote physical activity for our village - we have no access to gyms, or designated cycle routes to main towns. Our gym is the countryside, our lanes, footpaths. The NP needs to explain this more fully. Needs to be documented especially about protecting the areas mentioned in the LP draft. More details needed in this NP please, make it clear how the NP wants to do this.	The policy sets green infrastructure requirements for new development. Policy ANP9 deals with protection of the wider natural environment and landscape, the green guidance note later in the plan includes detail on green design, biodiversity and landscape.
	ANP11 Local Green Space	ANP11 - I agree with your listings of the green spaces also feel some areas, need to be expanded to save the green spaces attached, i.e. LGS60 expanded to Park Lane. By listing the green spaces doesn't address the fact that the LP wants to develop on greenbelt land. Playing fields are great for children, but not what is needed for adults or children cycling, walking or horseriding. LGS 56 - is this the responsibility of the parish - because it is overgrown and not accessible as it use to be. How can this area be accessible for all?	Comments noted. The proposed Local Green Space included have been informed by informal earlier consultation which resulted in changes to the originally proposed boundaries. We are satisfied that the spaces meet the NPPF criteria.

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			Maps updated to include LGS references.
	ANP12 Transport and Active Travel	ANP12 - The traffic is far too much on our main roads already, it is a cut through for the A500, more speed cameras and restrictions needed. The NP should state and get agreed with NULBC any 106 money from developers comes to the parish and the infrastructure is upgraded first before any development goes ahead, as the village is at capacity now. More parking, school places, more bus services, cycle lanes on the busy roads etc.	Infrastructure priorities added to the end of the Plan.
	ANP13 Local Energy Generation	ANP13 - Why doesn't the parish consider the land that staffs county council want to sell, to be used for solar or wind farms for the benefit of the village. The land could still be used for grazing animals and would not be concreted over and lost for ever. Proposed AB2 would be better used for solar and wind farms, with the energy generated coming back to the village.	The policy would enable solar and wind farms subject to impacts. The Neighbourhood Plan does not include the allocation of site AB2. The Parish Council objected to the proposed allocation of AB2 through the Local Plan process. The Neighbourhood Plan is not a tool for making representations on the Local Plan.
		How can the NP ensure hard surfacing is water permeable. Houses proposed in a field where it already floods, will cause so much more flooding. There is nothing in the NP to address this.	The green guidance note already encourages water permeable hard surfaces. The Neighbourhood Plan does not

Respondent Reference	Page no Policy/ Site Ref	Representation	Response
			proposes development of greenfield sites.
		School capacities are nearly full. 93% of people against the release of green belt for new employment and 90% against release of greenbelt around existing villages, from your own survey. Lets see more information of what the parish want and how the NP can state this. We have a start here to listen to the village and adapt the NP with more solid ideas of how the village can improve and also keep its rural nature.	The Neighbourhood Plan does not and cannot propose the release of green belt land. Policy ANP9 deals with protection of the wider natural environment and landscape, the green guidance note later in the plan includes detail on green design, biodiversity and landscape.
		We need improvements to our pavements especially in Church street, they are uneven and parking on the pavements, leaving limited room for pushchairs, wheelchairs and elderly with walking issues.	Comment passed to Staffordshire County Council Highways for information.
		Lets see a NP with more detail on saving our greenbelt, limiting the number of houses the borough wants to impose on the village. 2% of unemployment, means we don't need huge warehousing development for the village, which will affect the village drastically. Lets have a plan that lets the Borough know what we don't want for the village and the improvements we do want.	The Neighbourhood Plan does not and cannot propose the release of green belt land. This appears to relate to Local Plan site allocations.
RES 10 27 Nov 23		Protect Audley Parish Green Belt is an unincorporated community group of local residents (with 1,226 members and supporters) that is committed to the principles of the Better	Comment noted.

Respondent Reference	Page no Policy/ Site Ref	Representation	Response
		Planning Coalition. We strongly and sincerely believe that we must only build the right type of housing, in the right numbers and in the right places, whilst protecting and improving our natural assets. The Group appreciative of the enormous amount of work put into creating this Plan and time & effort given freely by the volunteers on the Steering Group. With this in mind, the following comments are intended as constructive criticism with a view to creating a stronger Plan that better reflects the views of the local community. A number of members have commented that aspects of the consultation could have been better: Not all residents received notice of this consultation; not all documents are downloadable, e.g. the HNA (the download button above it downloads the Design Code) and this made it hard to analyse for some members who are used to working with hard copies; there does not appear to be a copy of the residents' survey on the site which makes it difficult to fully assess the findings used as the evidence for the Plan's policies; and the questions on the feedback form (itself, not easy to find) are too vague and could have been more precise, e.g. the question on housing could have asked "do you agree with the proposition that an extra 250 dwellings are needed in the parish?" These points aside, the Group would like to make the following suggestions to improve the NDP:	A flyer was sent to every household. We tested document downloads to make sure they all worked in the browser. There was an issue with the design code button connecting to the HNA and this was rectified. If people had IT limitations contact details were provided. The consultation was run in accordance with Regulation 14 and consultation case law. It is simply a matter of fact that the emerging Local Plan identified 270 dwellings across the proposed sites. This would need to have been addressed through representations on the Local Plan.

Respondent Reference	Page no Policy/ Site Ref	Representation	Response
		Rural Lanes The Plan does not place enough emphasis on the value of the many rural lanes to most residents and to some businesses. The Group would like to see a paragraph (possibly on page 83?) acknowledging the value of the rural lanes for horse riders, cyclist and walkers. There is only one bridleway in the parish which makes these lanes vital for riders (and equestrian businesses such as stables) and cyclists. The high number of walkers (79% of residents according to the survey) that use the PROWs use many of these lanes to link up to different paths. The Group would also like to see an additional, third, paragraph at point 2 on page 32 along the lines of "C The active travel users (horse riders, cyclists and pedestrians) of the rural lanes, as identified in the Design Code."	Various policies place emphasis on the historic and rural character of the area. Policy ANP12 provides protection for footpaths and cycle routes. Policy ANP4 clause 3 and ANP12 clause 4 amended to make reference to horse riders. Active travel is already addressed in policies ANP4 and ANP12.
		Nature and biodiversity Members of the Group consider the section on nature and biodiversity to be inadequate. Many local councils have commissioned an in-depth study of their areas to inform policies on biodiversity from their local Wildlife Trust. Staffordshire Wildlife Trust has conducted such studies for Staffordshire County Council and for Newcastle Borough Council, so why not one for Audley Rural Parish? One of the results of a parish study is the identification of wildlife corridors and stepping stones (which link up the various sites of importance for wildlife). Page 62 of the Plan mentions wildlife corridors but none are identified. You can see an example of wildlife corridor mapping in the Alsager NDP. Whilst there is a national policy on biodiversity and the Local Plan will have such a policy, the NDP is an opportunity to	The evidence base for these policies included the Open Space and Green Infrastructure Strategy, April 2022; The Audley Rural Design Codes, May 2023; and The DEFRA interactive mapping data. We think that the policy has been adequately evidenced. An extract from the DEFRA magic map is already included in the plan. Biodiversity Alert Sites are dealt with in policy ANP9. This policy also deals with habitats. Policy ANP9 clause 1

Respondent Reference	Page no Policy/ Site Ref	Representation	Response
		improve upon these policies in a local context (and still be within general conformity). Do we need different net gain figures for different types of site/habitats? Whilst net gain is one aspect of biodiversity, is there a need for policies on specific habitats, e.g. one can increase general biodiversity whilst building on agricultural land and yet still reduce important habitat for specific important species such as ground nesting farm birds. The fall in farm birds is a particular issue which really needs a specific policy regardless of net gain. Like the rural lanes, the countryside and wildlife is a vitally important part of what makes Audley rural, it deserves a more in-depth study and policies to protect and enhance it.	amended to also mention biodiversity. Policy ANP10 includes a requirement for Biodiversity Net Gain. The green guidance note also addresses biodiversity.
		Housing The Group is unanimous in finding the section on housing unacceptable. The Parish Council took a decision not to identify sites (and leave it to NULBC), so why has it taken a decision to specify numbers? The numbers stated are not derived from local need but by adopting NULBC's provisional figures. The inclusion of these figures may be seen by the Borough Council as an endorsement of their numbers and may make them less likely to review their figures down (even after the NPPF is changed with the proposed emphasis on not releasing Green Belt for housing).	Unless the Neighbourhood Plan identifies that it is meeting housing need as set out by NULBC, there is a risk that the tilted balance could apply, which could allow speculative housing development on greenfield sites. This would be an unacceptable risk for the Parish Council. Planning rational amended to clarify this. This comment appears to relate to the Local Plan. The Neighbourhood Plan is not a tool for making representations on the Local Plan.

Respondent Reference	Page no Policy/ Site Ref	Representation	Response
		The overall NULBC housing numbers cannot be justified: The population of the Borough is falling (a 0.5% drop from 2011 to 2021) which suggests a lower household forecast. The fact the housebuilding has exceeded the increase in households over the past 10 years in the Borough. The number of new dwellings built in the Borough in excess of the targets in previous years (32% over the target from the 2018-19 year to the 2020-21 year).	The AECOM HNA was specific to Audley Parish. These comments appear to relate to the Local Plan.
		The HNA is not a local housing needs assessment built on a local housing needs survey (the few question in the residents' survey are not an adequate substitute for a full housing needs survey of the parish) but merely takes the NULBC total figure and apportions it, thus it is a Borough housing needs assessment. Whilst NULBC will determine and numbers and locations of strategic housing sites, it is not the Parish Council's role to mimic it. What is more, the HNA states that	These comments appear to relate to the Local Plan. Policy ANP1 seeks to encourage the type and mix of homes needed in the parish as evidenced in the AECOM HNA.
		the 250 dwellings is the residual figure for the parish, but it is not. The residual figure is 202 (with actual site allocations of an additional 272 above the existing permissions and new builds NULBC's figures do not even add up). The housing figures cited in the draft NDP are not compatible with the other policies in the Plan as the only way such high numbers can be provided is by releasing large areas of Green Belt.	A housing Needs Assessment was undertaken by AECOM. A householder questionnaire was also undertaken early in the process.
		The Borough's current plans on housing numbers will not deliver the type of housing that many residents have stated that we need. Once land is allocated for housing, the value of the land increases dramatically and truly affordable housing is	

Respondent Reference	Page no Policy/ Site Ref	Representation	Response
RES 11 27 Nov 23		squeezed out. The limited "affordable" housing (80% of market value) that is included in the proposed Local Plan policies is likely, if past developments are anything to by, to be revised down as development costs make the provision of such housing "unviable". It is worth noting that the high volumes of water in the parish will impact on the infrastructure costs of the housing developments. The Group would like to see a full local housing needs survey conducted in order to ascertain what actual housing needs the parish has. It may be that these needs can be accommodated by the use of exception sites policies. As it is at present, this Group cannot support the adoption of the NDP with the stated housing numbers. In regards to the neighbourhood plan, I have read some of it, about the number of houses and very disappointed that this document seems to follow what the borough council are wanting for the village. This village is a lovely country village, I have never lived in a town and do not want to end my days in a built up area. A few 1 bedroomed homes are needed for single and elderly, I was very fortunate to gain a home where I do, as I can't walk far, so the doctors, chemist, shops are just about my limit. Bus services are very limited and don't always turn up which I find it difficult to stand waiting, so now have to rely on my daughter to take me out. Unfortunately the pavements are not very good at all. They are uneven and cars park on the pavements making it difficult walking to the shops. I would like to see in the neighbourhood plan how these issues are to be tackled.	Unless the Neighbourhood Plan identifies that it is meeting housing need as set out by NULBC, there is a risk that the tilted balance could apply, which could allow speculative housing development on greenfield sites. This would be an unacceptable risk for the Parish Council. Planning rational amended to clarify this.
		In regard to warehouses, this is something this area doesn't need with the amount already in the neighbouring areas.	The Neighbourhood Plan does not make employment site

Respondent Reference	Page no Policy/ Site Ref	Representation	Response
		Please help to protect our green fields, greenbelt farms and countryside, it's now in your hands to put your neighbourhood plan in order, to save this countryside for our grandchildren. When I could walk, I enjoyed going along park lane and moat lane with my grandchildren. I want them to enjoy this with their grandchildren.	allocations. The Neighbourhood Plan does not and cannot propose the release of green belt land. Policy ANP2 explicitly supports business, agricultural diversification, live- work units and community facilities in the area. The Neighbourhood Plan is not a tool for making representations on the Local Plan.
		Look forward to seeing a revised plan for this community.	The Neighbourhood Plan will be amended as a consequence of responses to the Regulation 14 consultation. It will then be submitted to the Local Planning Authority for examination. This will involve publicity of the submitted Plan.
RES 12 27 Nov 23	ANP 1 Residential Development	3.3 ANP1 1 a Section 1: The policy details are scoped on development within the stated settlement boundaries. If the proposed growth of 250 houses is considered it is clear that these boundaries will not be applicable in the future growth of 250 houses and encroachment on the Green Belt is inevitable. This scope limitation of the current version ANP1 will be a limiting factor resulting in further work after a successful referendum when the housing plans become finalised. This policy should be amended to enable it to	Unless the Neighbourhood Plan identifies that it is meeting housing need as set out by NULBC, there is a risk that the tilted balance could apply, which could allow speculative housing development on greenfield sites. This would be an unacceptable risk for the

Respondent Reference	Page no Policy/ Site Ref	Representation	Response
		accommodate increased building outside of the settlement area should future events require it.	Parish Council. Planning rational amended to clarify this.
		The characteristics of what will be new housing design should also be accommodated in ANP1?	Design requirements are set out in policy ANP4 and other policies.
	ANP 2 Business and Community Facilities	4.3 ANP2 Point number makes reference to E class, F1 or F2 use. This short form needs to be explained in the glossary.	Interpretation amended to clarify where information on use classes can be found.
	ANP3 Audley Village Centre (Church Street)	4.4 ANP3 For completeness the businesses located at Bignall-End should be included within scope of this policy.	The policy relates specifically to the area marked in the accompanying map. Businesses in Bignall-End would be supported by policy ANP2.
	5.2 Page 37 – Design and Heritage/ANP7	5.2 Page 37 The register of identified in the link at the bottom of 37 under Register of locally important building and structures. The register is incomplete as it does not include St James Church Hill or the Motte. A verified list of heritage assets should have been included in the policy ANP7. Members of the community may not have access to the internet to view website information which may compromise their response in this area.	This relates to an external NULBC document. Comment passed to NULBC. Internet links have been removed from the document, in recognition that they are likely to stop working during the lifetime of the Neighbourhood Plan document.

Respondent Reference	Page no Policy/ Site Ref	Representation	Response
	5.2 Page 38 & ANP8 Shopfronts	5.2 Page 38 & ANP8 The example of shop design again refers to an internet link this requiring the reader to google for the document on the occasion. This guidance document itself is largely aimed at the preservation of Victorian shop fronts implying that this is the policy for Audley. The guidance does however provide an example (Wrights Pies) of a more contemporary shopfront. This alternative type of shop front should be included to clarify is also applicable if there are existing shopfronts of this style on church street.	The policy would apply to all new shopfronts. Policy ANP8 would apply to thew whole parish and would allow sensitively designed new shopfronts or historic reinstatements. Paragraph added to the interpretation.
	ANP4 Sustainable Design	5.2 ANP4 The interpretation section does appear interpret the meaning of point No 5. Further clarification is required as the meaning of no 5 is not at all clear.	Reference added to the NULBC Local List in the interpretation. It is already referred to in the rationale.
	ANP7 Heritage	5.6 ANP7 This appears to lack detail that places interpretation risk for the other unlisted Heritage Assets. A full list of Heritage Assets should be in included in this policy so as avoid misunderstanding of what is a "Heritage Asset" and where it is located. Details unique to the protection of each asset should then be documented using section 2 as a template.	
	ANP8 Shopfronts	5.7 ANP8 The requirements for the use of shutters would be impractical, expensive, and would not protect the windows	Clause 3 deleted and guidelines moved to interpretation.

Respondent Reference	Page no Policy/ Site Ref	Representation	Response
	ANP9 Natural Environment and	and door access at the front the building. The interior of the shop premises we see in Audley would be visually impacted if mechanical security shutters are fitted internally. Allowing vision through perforations to the interior of premises through shutters needs to be checked out with the police crime prevention team. 6.2 ANP9 The planning rational places some weight of the on the Landscape & Settlement Character Assessment Study,	The evidence base for this policy included the Open Space and Green Infrastructure
	Landscape	NULBC 2022. The Study makes strong cases for the management of green habitats but fails to recognise the importance of the wildlife that is dependent on it. There is no evidence to support that any independent surveys have been carried to set a baseline on which the policy ANP9 can be built. Staffordshire wildlife or similar organisation should have been involved to provide expertise in this important area. On this point alone I consider that policy detail within ANP9 is insufficient and is not strong enough to adequately support the green environment within the scope of this Plan.	Strategy, April 2022; The Audley Rural Design Codes, May 2023; and The DEFRA interactive mapping data. We think that the policy has been adequately evidenced. An extract from the DEFRA magic map is included in the plan.
	ANP11 Local Green Space	6.5 ANP11 The interpretation of this policy requires further details for the paragraph beginning "In the following". The previous paragraph states that Local Green Space has similar protection as Great Belts. Consideration should be given to summarising the difference between the two elements. This would support understanding in the community rather that the expectation that the reader is familiar with and understands the current version of NPPF is this area.	The purpose of the interpretation is to help decision makers to apply the policy. The risk of describing national policy (NPPF) in detail is that any change to the NPPF could then make the policy out of date.
RES 13	ANP 1	I feel any residential development should be created in the	The Neighbourhood Plan
(Online) 31 Oct 23	Residential Development	most sustainable way possible with the local wildlife in mind including solar panels and hedgehog highways/ swift boxes	includes a green guidance note that supports these matters.

Respondent Reference	Page no Policy/ Site Ref	Representation	Response
	ANP 2 Business and Community Facilities	We have far too many takeaways but are served adequately with shops/ hairdressers etc. we do need better public transport that connects us to Hanley without going through all of the villages and having to change in Newcastle.	Changes of use within use class E would not require a planning application. Takeaways would be sui generis, so would require planning permission.
	ANP3 Audley Village Centre (Church Street)	Better controls on antisocial behaviour both in the village centre and other hotspots in the parish	The Neighbourhood Plan does require consideration of impacts. However, anti-social behaviour would be a matter for the police.
	ANP4 Sustainable Design	We definitely need sustainable design in every aspect	Comment noted.
	ANP5 Audley Conservation Area ANP6 Character of Settlements	It would be nice to keep the settlements as close as possible, by using the land between as infill we are taking away important wildlife corridors there by putting even more stress on our local wildlife	The Neighbourhood Plan does not propose infill of the land between settlements.
	ANP7 Heritage ANP8 Shopfronts	Shopfronts and important heritage sites should be well maintained to show that we care about where we live	Comment noted.
	ANP9 Natural Environment and Landscape ANP10 Green	Green spaces should be managed for the health and well being of both humans and wildlife. By creating more allotment space it would allow people the opportunity to grow their own food and maintaining a sense of well-being. I also think that	Comment noted. The Neighbourhood Plan does not propose warehousing.

Respondent Reference	Page no Policy/ Site Ref	Representation	Response
	Infrastructure ANP11 Local Green Space	solar farms that would serve our community if done in a sustainable way would be far better use of unused agricultural land than warehousing that is not needed.	
	ANP12 Transport and Active Travel	Since we lost the number 4 bus service it has been detrimental. It would also be good to have a public transport link to Alsager so we can access the train station without using the car.	Comment passed to Staffordshire County Council Highways for information.
	ANP13 Local Energy Generation	As previously stated we should be looking at solar panel areas on unused land and support for people to have solar panels on housing.	The policy enables renewable energy.
RES 14 (Online) 26 Nov 23	ANP 1 Residential Development	I agree with the points raised and greenbelt should be limited	Comment noted.
	ANP 2 Business and Community Facilities	This will depend on if it generates local employment with a fair wage and not low paid unskilled jobs	The Neighbourhood Plan supports employment in general, but cannot influence wage levels.
	ANP3 Audley Village Centre (Church Street)	I agree with the points .	Comment noted.
	ANP4 Sustainable Design	My view are it should fit in the existing area and cycle paths should be provided	ANP4 together with ANP12 promote active travel.

Respondent Reference	Page no Policy/ Site Ref	Representation	Response
	ANP5 Audley Conservation Area ANP6 Character of Settlements	I agree with the policy for both these	Comment noted.
	ANP7 Heritage ANP8 Shopfronts ANP9 Natural Environment and Landscape ANP10 Green	This may be opportunity to tidy up shopfronts	Comment noted. Shopfronts are dealt with in Policy ANP8.
	Infrastructure ANP11 Local Green Space	I agree with the policy and the rural plan should adhere to these policies	Comment noted.
	ANP12 Transport and Active Travel	Skipped this question	No response
	ANP13 Local Energy Generation	Electric charging points would be limited and are they cost effective given the limited take up of electric cars due to price and range.	Electric charging points are now a requirement for all new housing in the Building Regulations.

Respondent Reference	Page no Policy/ Site Ref	Representation	Response
RES 15 (Online) 26 Nov 23	ANP 1 Residential Development	Development would be good on a very small scale for thee residents	Comment noted.
	ANP 2 Business and Community Facilities	We do not think that the village needs or could cope with a large housing or business complex ie:- doctors schools roads buses need i say more	The Neighbourhood Plan supports small-scale development within the existing settlements.
	ANP3 Audley Village Centre (Church Street)	Audley should stay as a village and not a big town, look at Newcastle there is empty shops building	Comment noted.
	ANP4 Sustainable Design	Audley is Audley has been for as long as i can remember leave it alone	Comment noted.
	ANP5 Audley Conservation Area ANP6 Character of Settlements	Audley and its surrounding areas is lovely i know things change but how and what should be on a very small scale if it has too	Comment noted.
	ANP7 Heritage ANP8 Shopfronts	The heritage of Audley is amazing and as for shopfronts i think the small business do an amazing job as small local business	Comment noted. Shopfronts are dealt with in policy ANP8.

Respondent Reference	Page no Policy/ Site Ref	Representation	Response
	ANP9 Natural Environment and Landscape ANP10 Green Infrastructure	We think that our environment and landscape green infrastructure local space is what Audley is all about.	Comment noted.
	ANP11 Local Green Space	Green space should be left alone	These policies provide protection for the natural environment and landscape and make Local Green Space designations. In addition ANP10 sets green infrastructure requirements for new development.
	ANP12 Transport and Active Travel	Transport is a joke in the village a bus every hour that doesn't service all the village queen street westfield ave not everyone has a car and all health that can walk, I myself have problems just getting to our small doctors and registered as disabled,	Comment noted.
	ANP13 Local Energy Generation	Local energy well if only a small amount of wind turbines not close to any residents, we wouldn't have a problem.	The policy requires careful consideration of impacts.
RES 16 (Online) 27 Nov 23	ANP 1 Residential Development	The document mentions that Scot hay is completely washed into the Green Belt, Perhaps The Council should be looking at the proposed policy being raised y the Borough Council to remove Keele Village, a similar village in the green belt, and also a conservation area where the Council is proposing to remove Keel from the green belt to relax the planning conditions within that enclosed village, find it strange that	Keele village is outside of the Neighbourhood Area. The Neighbourhood Plan does not and cannot propose the release of green belt land.

Respondent Reference	Page no Policy/ Site Ref	Representation	Response
		Scot Hay is not being trated similarly to remove the village from the Green Belt to relax planning constraints, while appreciate that Audley proposes to allow Development within existing infill spaces there will still be this condition that development has to comply with green Belt guidelines, If Keele is to be removed from the Green Belt then in the interest of fairness and transparency, Scot Hay should be treated similarly	
	ANP9 Natural Environment and Landscape ANP10 Green Infrastructure ANP11 Local Green Space	Nowhere in this document does it list Scot Hay Cricket club a public open space, while appreciate that the land is in Madeley Parish the Charity was set up to provide public open space for the residents of Scot Hay and beyond, Madeley Parish Councils local plan does not even mention it as open space either, so Audley should promote this site used by Scot Hay as a village open space	It is unclear whether this suggests Local Green Space designation. However, this facility is outside of the Neighbourhood Area.
	ANP12 Transport and Active Travel ANP13 Local Energy Generation	As Car transport will be emission free by 2035 the issue of car emissions and air quality will recede as as Public Transport is limited in the Parish in outlying areas the issue of pollution caused by the private car will diminish in an area where car use will still be essential for mobility without trying to discourage or limit it	Comment noted.
RES 17 (Post) 27 Nov 23	Page 34	I have spent many hours perusing the ARNP and broadly congratulate the Steering Group and Parish Council on their production of this slick looking document. On page 34 is a remarkable image of Church Street at night featuring two rarities: (i) A bus (ii) A near absence of parked cars!	

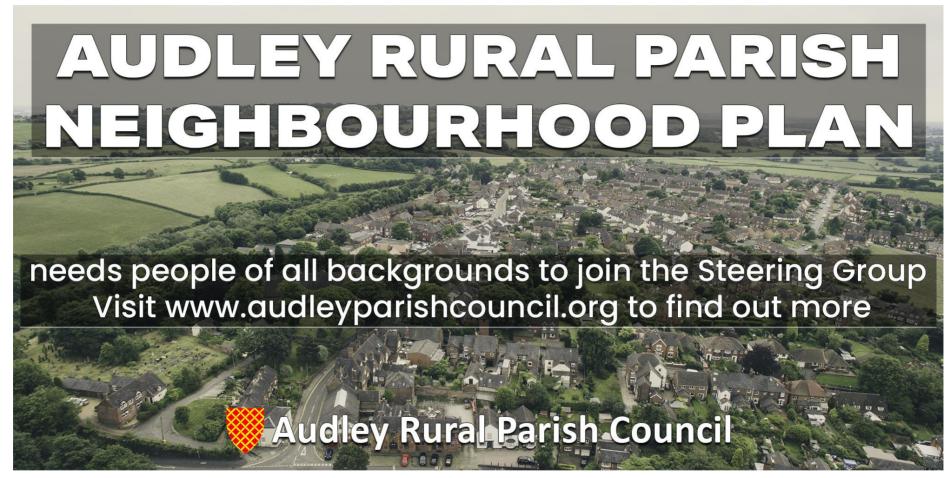
Respondent Reference	Page no Policy/ Site Ref	Representation	Response
		Noticeably the other photographs are devoid of traffic, even the one on Page 80 mislabelled 'M6 towards Mow Cop' which is obviously an A-Road (A500?). The pictures portray the parish as the residents would like it to be or perhaps as we remember it as it was in the last century. It certainly isn't an honest representation of the way things are now. Here's hoping the ANP can give an agreeable shape to way things will be.	Comments noted and mislabelling corrected.
	P15 Background and context	2.5 Vision – Commendable 2.6 Aims – Noble 2.7 Format of policies – I have major issues with the evidence document 'Audley Rural Housing Needs Assessment'.	Comments noted.
	Housing	Why would you regurgitate the flawed and speculative figures produced by the Borough Council after showing evidence that undermines it? The analysis of the Census figures on Page 18 indicates much less housing need and this is supported by the responses to your own household and business consultation of March 2022. I am not really convinced that "The Audley Rural Neighbourhood Plan provides a powerful set of tools for local people to ensure that they receive the appropriate types of development for their community" page 5 paragraph 3. It looks rather more like top-down governance imposing irrational housing allocation brought about by the desire to balance the books at Borough level. Appropriate development would be community led and where necessary making use of rural exception sites (res) as a means of providing needed homes for local people. Why is	Unless the Neighbourhood Plan identifies that it is meeting housing need as set out by NULBC, there is a risk that the tilted balance could apply, which could allow speculative housing development on greenfield sites. This would be an unacceptable risk for the Parish Council. Planning rational amended to clarify this. Throughout the Plan it makes references to the NPPF.

Respondent Reference	Page no Policy/ Site Ref	Representation	Response
	_	there no mention of this crucial element of the NPPF in either the Local or Neighbourhood Plans? Apparently profit is more important that people.	
	P55 Green Environment	There's a lot of harping on about open space, biodiversity and nature conservation but no proper factual content eg wildlife and biodiversity surveys at parish level or explorations of wildlife corridors linking our country parks. Instead endless maps, diagrams and lists that do little to inspire, inform or aid understanding of future vision.	The evidence base for these policies included the Open Space and Green Infrastructure Strategy, April 2022; The Audley Rural Design Codes, May 2023; and The DEFRA interactive mapping data. We think that the policy has been adequately evidenced. An extract from the DEFRA magic map is already included in the plan.
	Pages 57 and 58	Im really struggling to even see our neighbourhood on the ordnance survey maps on Pages 57 and 58. Other nearby authorities have liaised with wildlife organisations to carry out in depth analysis and develop cohesive strategies.	Maps requested at Parish level from NULBC and replaced in document.
	P81 Infrastructure	The many local footpaths are well trodden and are linked by our network of narrow and winding lanes. These spaces form a large part of our parish contributing massively to the physical fitness and mental well being of our community. There is very little mention and no weight given to the importance of the lanes and their connectivity to the	Various policies place emphasis on the historic and rural character of the area. These comments appear to relate to the Local Plan which proposes site allocations for warehousing.

Respondent Reference	Page no Policy/ Site Ref	Representation	Response
		greenways enjoyed by so many. More could be made of these ancient assets; with improved road safety we could encourage more appreciation of our beautiful countryside and prioritise persons over traffic, wild life over warehouses and thereby safeguard our rural character for generations to come.	
RES 18 (Post) 27 Nov 23		Firstly I would like to say that I appreciate the time and effort which has gone into producing the Audley Rural Neighbourhood Plan, by the Parish Council.	Comment noted.
		However I do feel it has missed an opportunity on certain points to should loud and clear that the majority of locals do not agree with the NULBC Local Plan. For example: On the one hand you rightly state that you wish to protect the Green Belt, but when it comes to Housing your statements fall into line with NULBC and therefore does not protect our Green Belt. *PLEASE DO NOT WASTE THIS OPPORTUNITY TO FIGHT TO PROTECT OUR VILLAGE(S).	The Neighbourhood Plan is not a tool for making representations on the Local Plan. The Neighbourhood Plan does not and cannot propose the release of green belt land.
	ANP1 Residential Development	Very disappointing that you have just use NULBC figures which are at best <u>out of</u> date and do not reflect local requirements. If you quote figures you need to do a <u>proper survey</u> and <u>not</u> a vague questionnaire. No backbone to this section !!	Unless the Neighbourhood Plan identifies that it is meeting housing need as set out by NULBC, there is a risk that the tilted balance could apply, which could allow speculative housing development on greenfield sites. This would be an unacceptable risk for the Parish Council. Planning rational amended to clarify this.

Respondent Reference	Page no Policy/ Site Ref	Representation	Response
	ANP9 Natural Environment and Landscape	You have mentioned a wildlife corridor and habitats. These need specific identification otherwise it is meaningless and offers no protection at all.	An extract from the DEFRA magic map is already included in the plan. Various policies place emphasis on the historic and rural character of the area.
	ANP12 Transport and Active Travel	You have ignored the value of our local lanes which connect our footpaths. These should be identified/named to help protect them for use by walkers and horses alike.	Also, ANP12 provides protection for footpaths and cycle routes. This policy and ANP4 amended to make reference to horse riders.

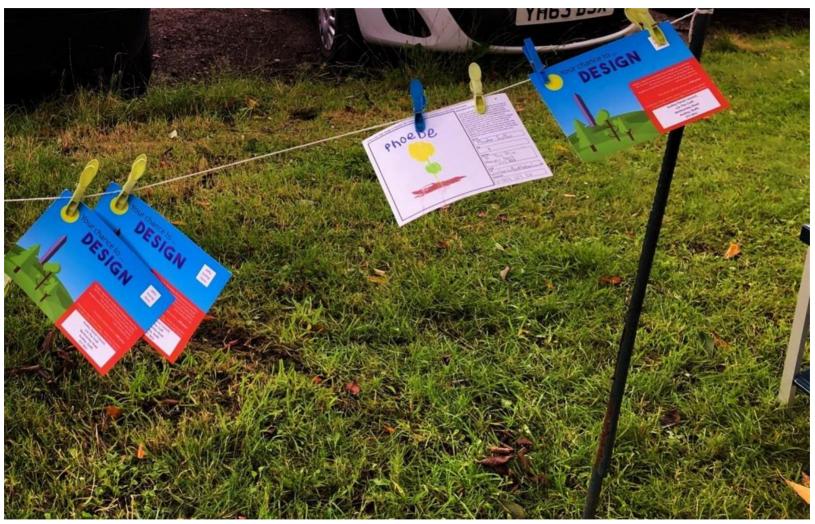
Appendix A - Examples of Publication materials



Roadside banner - January 2021



Consultation Boards – July 2021



Young persons competition for a Logo – July to Sept 2021

Your chance to ... DESIGN

Affix stamp here

Draw your logo design in the box. Be creative and try to represent our beautif	ful local area.
	Information for Parents/Carers
	Entrants must live in Audley Rural Parish and must be 16 years old or younger at time of entry. All entries will be recorded anonymously as part of our evidence base, with a note made about the young person's artwork. Winning entries will be used in the Neighbourhood Plan, and we reserve the right to include other entries. Postcards must be sent to the address shown or dropped off at Audley Library or Halmer End Post Office by the closing date 17th Sept 2021. The winner/s will be selected by the Steering Group and announced by 30th Sept 21. Please provide the young person's name, age, address, your email/telephone number. This information will only be used to contact you about their entry. Name Age
	Address
	Email Telephone

Design a logo for the Audley Rural Neighbourhood Plan.
Use the back of this postcard to draw out your design.
The winner will feature on all Audley Rural
Neighbourhood Plan documents including our website:
www.audleyplan.org

The winner will also receive a £20 prize!

Create your design on the reverse, entries can be posted or left at Halmer End Post Office and Audley Library.

Audley Parish Council, c/o The Croft Barthomley Road Audley, Staffs ST7 8HU

Young person's competition for a Logo – July – Sept 2021

Newcastle Borough Local Plan Consultation NOW OPEN

Have your say on future growth & development in our Parish and Borough visit www.newcastle-staffs.gov.uk

Audley Rural Parish Neighbourhood Plan
to find out more about the development of the
Neighbourhood Plan
visit www.audleyplan.org

Roadside banner - November 2021



Example of promotional material used – Spring 2022

Audley Rural Neighbourhood Plan

What are we doing?

Audiey Rural Parish Council is supporting a small group of local residents to develop a Neighbourhood Plan for the Parish of Audiey. The Parish includes the villages of Audiey, Bignall End, Wood Lane, Milles Green, Scot Hay, Alsagers Bank and Halmer End. A Neighbourhood Plan looks at the use and development of local land. It also looks at other issues like the environment, transport and housing. We are at the very early stages of developing the Plan, which will run from year 2022 until year 2042.





The group will be working with a Neighbourhood Plan consultant (Urban Vision) to get local people's views on issues of concern, special areas, assets and planning matters. These views will be used to write policies for future developments to consider.







The Neighbourhood Plan will identify important Heritage Assets and Local Green Spaces in our Parish to try to protect these. We are also building a Character Assessment to record the special things in the area. This work will help to inform a Design Code for our Parish. The Design Code will provide guidance for any new development to make sure it fits with the local style, character and needs of our Parish. A Housing Needs Assessment is being created to understand the housing needs of our parish, now and in the future. All of these things will be included in our Neighbourhood Plan.





Our Neighbourhood Plan will become part of Newcastle Borough Council's Local Plan. The Local Plan is a legal document which looks at where new housing, roads, shops, businesses and schools should be until year 2040 for the whole of Newcastle borough.



For more info, go to www.newcastle-staffs.gov.uk/all-services/planning/planningpolicy/local-plan Newcastle Borough Council will decide where the new housing goes and how much, but they will ask for your views. We will also influence this through our Plan.

How can I have my say?

We want to make sure all local residents can give their views and help to shape the Neighbourhood Plan. Over the winter months we will be asking you to complete a householder survey to get your views. Watch this space! You will also have a chance to comment on the draft Neighbourhood Plan before it is finalised.

Where can I get involved?

We asked people to come forward in the earlier part of the year to join the Steering Group, which held its first meeting on 22nd April 2021. There are still a few vacancies so if you are interested in joining us, please contact





Winning entry for the logo competition - drawn by a pupil of Sir Thomas Boughey Academy



How long does this take?

Audley Rural Neighbourhood Plan Area designated - December 2020*

Neighbourhood Plan Steering Group formed - April 2021

Development of Plan - June 2021 to April 2022

Housing Needs Assessment Assessment Case of the Assessment Assessment Assessment Needs Assessment Needs Assessment Needs Assessment Needs N

Plan writing and draft Plan - November 2021 to May 2022

Policy and Proposals Formulation

Plan Writing

Draft Plan (Regulation 14) - June 2022

For more information please visit www.audleyplan.org or www.neighbourhoodplanning.org/about/neighbourhood-planning/



Audley Rural Neighbourhood Plan Local Green Space Consultation





From Friday 7th October to Friday 4th November 2022





Audley Rural
Neighbourhood Plan
We want to hear your views
on the 54 proposed sites for
Local Green Space Designations

Come and talk to us: Sunday 9th October 2022

Wood Lane Comm Centre, Apedale Road 4pm to 5pm Audley Pensioners Hall, Church Street 5.30pm to 7pm

Sunday 23rd October 2022

Alsagers Bank Primary School, The Drive 3pm to 4pm Halmer End Institute, Wesley Place 4.30pm to 5.30pm

Friday 28th October 2022

Audley Methodist Church New Road Bignall End 6pm to 7pm

A hard copy of the sites will be available in

Audley Library or you can visit

www.audleyplan.org/greenspaces.php

for more info on the proposed sites and how to respond

from Friday 7th October 2022 Consultation ends Friday 4th November 2022



email: audleyparishcouncil@hotmail.co.uk website: www.audleyplan.org

Photos by kind permission of Shraleybrook Media

Information Booklet and Poster for Local Green Space Consultation – October 2022

Audley Rural Neighbourhood Plan

What are we doing?

Audley Rural Parish Council is supporting a group of 16 local residents to develop and produce the Audley Rural Neighbourhood Plan (ARNP). This will cover the villages of Audley, Bignall End, Wood Lane, Miles Green, Scot Hay, Alsagers Bank and Halmer End. The ARNP is a document that sets out planning policies for the Parish until 2042. It highlights local green spaces, design guidance for any new housing and heritage assets we want to protect. Once the ARNP is Made, Newcastle under Lyme Borough Council (NBC) will use it, together with their NBC Local Plan. when they consider planning applications.







What have we done so far?

We are now at the final stages of writing the draft ARNP. Using the views gathered from residents of the Parish through the Household and Business surveys conducted earlier in 2022, and working with a consultant (Urban Vision Enterprise), the group are developing policies for future developments in the Parish. The key themes identified from the surveys will be used to shape these policies. You can see an infographic of the survey results by visiting our website www.audleyplan.org





We have also submitted a list of our Parish Heritage Assets to Newcastle under Lyme Borough Council (NBC) for them to consider and include in their Local List. We are also approaching the final stages in the development of a Design Code for the Parish. This will act as a guide to ensure any new housing development is in keeping with the local style, character and needs of the Parish. A Housing Needs Assessment has been created to understand the housing needs of the Parish, both now and in the future. We have completed the consultation on Local Green Spaces and identified 54 sites. Feedback from the consultation is being assessed to establish the final list of sites for designation. All of the above will be included in the ARNP.





Leaflet to all households in Winter 2022

What happens next?

The ARNP will become part of Newcastle under Lyme Borough Council's strategic plan together with their Local Plan. The NBC Local Plan sets out where new housing, roads, shops, businesses and schools should be until 2040 for the whole of Newcastle Borough, For more information, go to www.newcastle-staffs.gov. uk/all-services/planning/planning-policy/local-plan. Newcastle under Lyme Borough Council will decide how much new housing there will be and where it goes, but they will ask for your views and we can influence their decision through the ARNP. It is important that you take the opportunity to respond to the NBC Local Plan consultation, expected in the spring of 2023, as this will be your chance to influence how our villages and the whole of Newcastle Borough evolves over the next 20 years.



Winning entry for the logo competition - drawn by a pupil of Sir Thomas Boughey Academy



HOW can I have my say? You will be able to comment on the ARNP before it is finalised and will be able to vote in a formal referendum. once we reach that stage.

When can I get involved? We will let you know when you need to provide your views on our Draft ARNP but we expect this to be around Spring 2023.

How Long does this take?

Audley Rural Neighbourhood Plan Area designated - December 2020

Neighbourhood Plan Steering Group formed - April 2021



Development of Plan - June 2021 to November 2022

Housing Needs Assessment Stakeholder

Design Character Assessment Heritage Asset selection, Green Space audit analysis

Analysis and Issues/

Input into NBC Local Plan/ Housing

Plan writing and draft Plan - November 2021 to February 2023

Policy and Proposals Formulation

Plan Writing

Draft Plan (Regulation 14) - Spring 2023

For more information please visit www.audleyplan.org or www.neighbourhoodplanning.org/about/neighbourhood-planning/

Audley Rural Neighbourhood Plan (ARNP) Frequently Asked Questions: Update (Autumn 2023)

Q: What is the Andley Rural Neighbourhood Plan?

A: A document prepared by the local community containing planning policies which will be used to inform local planning decisions. It focuses on promoting the rural economy, the type and mix of housing we need for the local population, climate change and protecting the rural and natural landscape to preserve the rural character of the Parish. You can read more about neighbourhood planning here: www.gov.uk/government/gst-involved/take-part/make-a-neighbourhood-plan

You can also find out more about Newcastle-under-Lyme (NUL) Borough Council's Local Plan on the next page.





Q: Where does the Audley Rural Neighbourhood Plan cover and over what timescale?

A: The Parish of Audley Rural including the villages of Audley, Bignall End, Wood Lane, Miles Green, Scot Hay, Alsagers Bank and Halmer End. A formal vote (referendum) is expected to be held in the summer of 2024, at which point the Audley Rural Neighbourhood Plan will be 'Made' (adopted). Once Made, the Audley Rural Neighbourhood Plan will be in place until 2042.





Q: How has the Audley Rural Neighbourhood Plan been developed?

A: It has been developed using the results of a survey and other consultation carried out with the local community, as well independent reports such as the Housing Needs Assessment by AECOM. There is also a Design Code which provides helpful design guidance for any new-build properties and shopfronts in the Parish.



Q: What happens now?

A: The Audley Rural Neighbourhood Plan is now ready to move forward to the next stage in the process which is called pre-submission Regulation 14' consultation. Following this the Draft Plan is submitted to Newcastle-under-Lyme Borough Council for the next stage of consultation before it is passed to an Independent Examiner. It is expected that the plan will be adopted ('Made') in the summer of 2024. We are seeking your views on the Draft Plan through the 'Regulation 14' consultation which runs from Monday 16th October 2023 at 17:00 to Monday 27th November 2023 at 17:00.



Four page leaflet to all households and business Regulation 14 Consultation

Q: Where can I see the Draft Audley Rural Neighbourhood Plan?

A: You can view the Audley Rural Neighbourhood Plan at www.audleyplan.org and view a paper copy* at the following locations from Monday 16th October 2023 onwards:

- · Audley Library, Hall Street, Audley
- Parish Council meeting 6.30pm to 9pm on Thurs 19th Oct at Audley Pensioners Hall and Thurs 16th November at Halmer End Institute
- · Post Offices at Audley, Halmer End, Bignall End and Wood Lane
- · The Gresley Public House, High Street, Alsagers Bank
- During Minnie's Café at The Stute, Wesley Place, Halmer End (every Weds mornings 11.30am to 1.30pm)

*If you would like to view a large print version please contact us by ringing 07946 060826.

A summary of the Draft ARNP is included within this leaflet.

Q: How do I respond to the Audley Rural Neighbourhood Plan 'Regulation 14' Consultation?

A: A form is available online at www.audlevplan.org and anywhere we have paper copies of the Neighbourhood Plan available. You can also respond via email to: audlevpparishcouncil@hotmail.co.uk or by post to: Audlev Rural Parish Council, c/o The Croft, Barthomley Road, Audlev, SHU. Post or email responses should refer to the page number and/or policy reference for each comment.

We are holding the following community drop-in events:

- Thurs 19th October 2023 at Audley Pensioners Hall 6.30pm to 7.00pm*
- Sat 11th November 2023 at:
- . 10.00am to 11.00am at The Stute (Wesley Place, Halmer End),
- 11.15am to 12.15pm Alsagers Bank Primary School (The Drive, Alsagers Bank),
- 12.45pm to 1.45pm Audley Pensioners Hall (Church Street, Audley)
- 2.00pm to 3.00pm Wood Lane Vibe (Community Centre Apedale Road, Wood Lane)
- Thurs 16th November 2023 at Halmer End Institute 6.30pm to 7.00pm*

*(before start of the Parish Council meeting)

Q: What is New castle-under-Lyme (NUL) Borough Council's Local Plan?

A: Neighbourhood Plans and Local Plans are both part of the overall statutory development plan (planning policies and proposals) for an area.

Once adopted, the NUL Local Plan will shape the future of planning in Newcastle-under-Lyme Borough until 2040. The Local Plan will identify how many new homes are required and where new housing and employment sites will be allocated, as well other types of development. The Local Plan includes policies for the whole Borough which are used by planning officers to manage development and shape the character and appearance of the area. The Audley Rural Neighbourhood Plan specifically reflects the needs and wants of the Parish community and will be used along with the NUL Local Plan to inform planning decisions made for the Parish of Audley. You can read more about the NUL Local Plan at www.newcastle-staffs.gov.uk/planning-policy.

Q: Does the Audley Rural Neighbourhood Plan allocate sites for employment and housing developments?

A: No the housing and employment sites are not allocated or determined by the Audley Rural Neighbourhood Plan. The housing and employment sites are allocated within the NUL Local Plan. You are encouraged to respond to the next NUL Local Plan consultation (expected Spring 2024) when you can have your say on the proposed housing and employment sites for the Borough which will include Audley Rural Parish.

To inform this, the policies within the Draft Audley Rural Neighbourhood Plan seek to preserve the rural character of the Parish. For instance, Policy ANP9 Natural Environment and Landscape states that 'development should not involve the loss of the best and most versatile agricultural land'. Policy ANP1 Residential Development caters for a small-scale growth within the existing village boundaries ('envelopes') to meet our local population needs. For example, an independent study used to inform the Neighbourhood Plan suggests the type and mix of new housing required in our Parish includes specialist housing for older people, affordable housing, small homes and family homes.



A summary of the Audley Rural Neighbourhood Plan (ARNP)

The beginning of the Draft Audley Rural Neighbourhood Plan sets out the background and context of the Parish eg location and characteristics, Census 2021 statistics and a number of key issues. It includes some infographics of the findings of the consultation surveys, which have informed the vision, aims and the 5 key themes:

The 13 policies within the Draft Plan are individually referenced and grouped within the 5 key themes. Each policy contains a purpose, planning rationale and the policy detail with some relevant images. A summary of each policy is set out below:

Section 1 - Housing:

Policy ANP1 Residential Development seeks to ensure that the parish provides people with a range of affordable, high quality housing opportunities which help ensure the vibrancy and diversity of the area. It caters for the small-scale level of growth identified and sets out sustainable locations for housing growth.

Section 2 - Economy:

The rural economy is supported in policy ANP2 Business and Community Facilities which protects existing services and supports diversification and rural business enterprise and agriculture. ANP3 Audley Village Centre is a focused policy to support the thriving 'hub' of services that support the entire Neighbourhood Area.

Section 3 - Design and heritage:

Sustainable and innovative design including high energy performance and low carbon development is supported through policy ANP4 Sustainable Design. Policies ANP5 Audley Conservation Area, ANP6 Character of Settlements and ANP7 Heritage seek to protect and enhance the townscape and character of the settlements. The Neighbourhood Area has a range of heritage assets, including the prominent grade II*'St James the Great' church in Audley and Castle Hill motte a Scheduled Ancient Monument and a number of non-designated assets. Policy ANP7 Heritage encourages sensitive refurbishment and reuse to preserve and enhance the heritage assets across the Neighbourhood Area. Policy ANP8 Shopfronts seeks to protect historic shopfronts and support well designed active frontages.

Section 4- Green environment:

The natural and rural environment is a key priority of the Audley Rural Neighbourhood Plan. Key landscape characteristics, features and habitats are identified in policy ANP9 Natural Environment and Landscape, recognising the importance of the rural landscape character. Policy ANP10 Green Infrastructure identifies priorities for biodiversity net gain and encourages new development to include high quality space for amenity of new residents. The 48 Local Green Space designations are included, some of which contribute to biodiversity or support local wildlife and contribute to the wider green infrastructure of the area. The Local Green Spaces designated are demonstrably special to the community they serve for recreation, leisure, and the value to the natural environment. These are listed in policy ANP11 Local Green Space.

Section 5 - Infrastructure:

The plan promotes a balanced and sustainable range of transport in policy ANP12 Transport and Active Travel supporting the existing path network and active travel routes such as the former Mineral Line. Policy ANP13 Local Energy Generation supports community energy production and renewable energy generation.

The document includes a green guidance note for developers on green design. It is an informal note, so includes non-planning matters. However, use of the guidance may help in achieving compliance with the policies of the neighbourhood plan, in particular those relating to design and landscape.

The Draft Plan concludes with the complete infographic of the consultation carried out with the household and businesses in the Parish in March 2022.









Information produced by Audley Rural Neighbourhood Plan Steering Group in conjunction with Audley Rural Parish Council – October 2023

AUDLEY RURAL

Neighbourhood Plan



Have your say

Regulation 14 Pre-submission Consultation now open

Deadline for responses Mon 27th Nov 2023 (5pm)

To view the Draft Plan and find out more info go to www.audleyplan.org

Hard copies and response forms are also in Audley Library, all Post Offices, The Gresley Arms, Minnies Café (@ The Stute)

Produced by Audley Rural Parish Council

Roadside banner promoting Regulation 14 consultation – October 2023



Roadside banner in situ at one of the 5 gateway sites promoting Regulation 14 consultation – October 2023

Appendix B - Key Local Stakeholders

77th 1st Audley Scout, Explorers, Beavers, and Cubs

Alsagers Bank Community Group

Audley & Dist. Pensioners' Association

Audley & District Family History Society

Audley Allotment Association

Audley Bowling Club

Audley Parish Bowman

Audley Brass Band

Audley Cricket Club

Audley Football Club

Audley Girl Guides, Brownies and Rainbows

Audley Ladies' choir

Audley Men's Choir

Audley Methodist Church

Audley Parish Angling Club

Audley Players Theatre Group

Audley Rotary Club

Audley Striders Running Club

Audley Millenium Green

Leddys Field Support Group

Audley Women's Institute

Bignall End Cricket Club

Children of Audley Residents Association

Halmer End Bowling Club

Halmer End Institute

Halmer End Methodist Church

Millennium Green Trust

Parish of Audley Medieval Society

Probus Club

Scot Hay Cricket Club

Halmer End Methodist Church

Audley Methodist Church

St James Church

St Johns Church

St. Michael's Orthodox Church

Wood Lane Cricket Club

SCHOOLS, HEALTH AND PUBLIC SECTOR

Ravensmead Primary School

Richard Heathcote Primary School

Wood Lane Primary School

Sir Thomas Boughey Academy

Audley Health Centre

Audley Dentist

Audley Library

Audley Rural Parish Council

LOCAL BUSINESSES AND LANDOWNERS

151 approx. Local Businesses/Rateable premises

Parish Landowners

Parish Bus Service Operators

Appendix C – Community Consultation Infographics from Household and Business Surveys

Key findings



25% responded

3,869
Audley Rural
Neighbourhood
Plan Household
Questionnaires
were issued

questionnaires were undeliverable







people completed the questionnaire online

Most people have lived in Audley Rural Parish for a long time, the average was 31 years

Most people completing the survey were white British

About you and your home



32% of people live in a semi-detached house



24% of people live in a terraced house



24% of people live in a detached house Fewer than 10% of people said they wanted to move to a bigger property

Fewer than 10% of people said that they wanted a **smaller property**



Just under a third had more than one generation living in the home

The average home had 2 or more people living in it

Just over a third had someone aged 60-74 living with them

Almost half had a person aged 30-59 at home



Over half of people said that community spirit and friendliness were one of the best things about living in Audley Rural Parish

Over a third of people said that healthcare and the countryside were good things about living here

Most people said they like living in Audley Rural Parish

Nearly 90% said they were not considering leaving the Parish Nearly half of people said that parking issues were one of the things they didn't like about living in Audley Rural Parish

A quarter of people said

Anti-social behaviour
or crime was a problem.

A fifth of people said litter was a problem

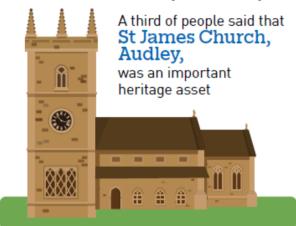
Over a third of people said parking needs to improve

A quarter said that there needs to be **more police** and Anti-social behaviour needs to improve

A fifth said that Audley needs traffic calming measures.

What is important to people about Audley Rural Parish

A heritage asset is an item that is important because of its contribution to Audley's community and culture



A fifth of people said that the Wedawood Monument was important

Green Spaces

Most people said that green spaces were very important



Half of people said **Bateswood** was important in Audley Rural Parish



Nearly a fifth of people said Marion Platt Way was important in the Parish



Over 10% of people said Apedale and Leddys Field were important



Almost 10% of people said Podmore was an important area

Housing

Most people said it was important to reuse existing buildings

84% of people said that brownfield sites should be reused

Over a third of people said it was OK to fill in small gaps in villages

92% of people said that large areas of green belt should not be used for housing developments and 72% said no to small changes around existing villages

Almost half of people said that there was a need for sheltered accommodation or a retirement village

Almost half of people said that starter farms and zerocarbon energy efficient homes

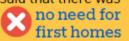
were important when thinking about housing



Over half of people said that there was



Almost half of people said that there was



Over 40% of people said there was no need for smaller homes or houses that people build themselves



Over half of people said that there was



Over a fifth of people thought there was



a shortage of housing

Environment, sustainability and quality design (Design Code) Alsagers

Most people said it was important to keep the rural character and feel of the Neighbourhood Area

Most people said that protecting green and open spaces was an important statement for the Design Code for Audley Rural Parish



Nearly 90% of people said that it was important for villages to stay separate

Leisure and wellbeing

Most people said that the things that need to be made better were

Policing









Over two thirds of people thought that some things in the Parish were missing. The top five were

Car parking Sports facilities

Cycle paths and bridleways

Bus services Activities for young people











Almost 90% said parking needed to be provided

86% would like to see more communal parking

Almost 90% wanted sustainable urban drainage

Most people did not want over development in the Parish

Most people said that **new housing must be in keeping** with the nearby properties and area A quarter of people have problems with surface water flooding and flash flooding



Over a quarter of people wanted off road cycling/bridleways

A quarter of people want **tennis courts**

Over 10% of people wanted 4G football pitches

Some people said that facilities in Audley Rural Parish like those at



Sir Thomas Boughey Academy

should be made available for the public Over 84% of people said that Healthcare (Doctor, Dentist, Pharmacy) was one of the most important services in the Parish

Over three quarters of people said that the shopping area in Audley needs improving

Almost a fifth of people
want a wider range of shops
The top three shops people want are
Butcher Greengrocer
Café / Coffee Shop



Three quarters of people said there needs to be guidance for shop frontage and signage

Almost half of people want better parking

Almost a fifth of people want the Parish to be tidied up People gave ideas to improve the car parking and traffic:

A one way system

The use of the wide pavement by the dentist for a short stay car park

Tarmacking the Methodist Car Park

Better enforcement of parking regulations

Getting around

Most people use their own cars to get around. The top three ways of getting around are:

Own car



Walking



Bus or taxi



Over three quarters of people used local footpaths often

Over 86% of people would use a new communal car park instead of parking on narrow congested roads

Over three quarters of people never use public transport around the Parish, as it is too expensive, preferring to walk or use the car

Almost three quarters of people never use public transport to travel outside the Parish. Most people use a car as there is no direct service, or times are not what people want

A lot of people travel outside the Parish for shopping and leisure. The top four places are



There are not enough evening bus services

Three quarters of people said there were no problems getting around the Parish but cars on pavements were a worry for wheelchair users and people with prams

Home working

Almost a quarter of people work from home

Just under 10% run their own business from home

Over a quarter of people have **problems with Broadband**. A lot of people said this was a problem





Using the train

75% of people use **Crewe** railway station

Over 50% of people use **Stoke**

15% of people use **Alsager**

of people never use trains



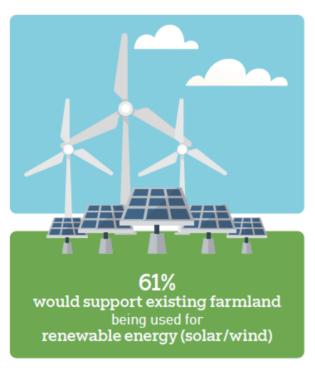
Rural enterprise and local economy

46% felt that starter farms were needed

32% felt that smallholdings were needed

12% felt that a farm shop was needed





90%
would NOT
support existing
farmland
being used for
new employment
sites (warehouses/
offices)



81%
felt that
new employment
was NOT needed
in the Parish and only

3% felt that the green belt should be released

87%
felt that
existing buildings
and
72%
brownfield
sites should be
primarily used

93% are against the release of green belt for new employment

90%
are against
the release of
green belt
around existing
villages and

83%
are against
expanding
villages to
create new
employment sites



Business survey



151Audley Rural
Neighbourhood
Plan Business
Questionnaires
were issued

questionnaires were undeliverable







people completed the questionnaire online

46% of the businesses were from Audley

12% were from Alsagers Bank, 15% from Bignall End, 4% from Halmer End and 4% from Miles Green

Businesses

Where the business was stated:
A fifth were

A fifth were restaurants, cafes, or pubs



15% were health and wellbeing businesses



Almost three quarters had been in business for over 11 years 8% between 6-10 years 20% 1-5 years 4% were new businesses (less than a year old)



Over half of businesses had no issues affecting their growth

Things affecting business growth Not enough late transport



Not enough/lack of parking



Not enough affordable homes for first time buyers

Over a third had been victims of crime/ anti-social behaviour

in the last 12 months

31% of businesses stated they would like the opportunity to network with other business in the Parish

Over three quarters of businesses said more parking was important



Over three quarters of businesses said public transport was important in supporting business



12% of businesses said that advice and support to develop their business was important Over half of businesses said development of green belt was not important to business growth

Suggestions put forward as important to support business were Better police presence



Bus service after 6pm



Traffic calming at the top of Black Bank when entering Alsagers Bank



Customers

Most customers travel to the businesses in the following order of preference:

1st - Car 96%



2nd -Walking 69%



4th - Taxi 31%



Things that had negative impacts on businesses were:

Parking



Speeding in the village 46%

Traffic volume 41%







A quarter of customers were local

12% were from outside the parish

Over two thirds of customers were a mixture of local people and people from outside the parish



Almost three quarters of local businesses promote themselves online

Over three quarters use broadband adequate for their needs

Almost three quarters use a mobile phone



Workforce



employ all of their staff locally



employ more than half of their staff locally



employ less than half of their staff locally



employ no local staff

Most staff travel to work in the following order of preference.

1st - Car **96%**



2nd -Walking **68**%



3rd - Public transport 12%



4th - Taxi 12%



Businesses said that parking, public transport, and a lack of taxis were problems

Over three quarters of businesses had no issues recruiting staff

81% recruited staff locally

Not many businesses said that they could access training locally. Of these half were positive and half negative

Just over half of businesses said their current premises had the capacity to expand for future business growth 79% did not think that there would be suitable premises in the area if they wished to move and expand



