



Neighbourhood Statement

Loggerheads, Staffordshire

Introduction

Loggerheads Parish Council has prepared this Draft Statement as the basis of information upon which it is conducting a widespread consultation amongst local residents on prospective future land-use developments in Loggerheads. The objective is to arrive at a Parish Policy that enjoys the recognised support of residents of the civil parish.

The Statement will make reference, where appropriate, to a detailed letter sent to Newcastle-under-Lyme Borough Council (NuLBC) on 28th September 2012, which set out the Parish Council's position at that time. A copy of that letter can be read on the Parish Council's website, at www.loggerheadsparishcouncil.com/ or can be supplied as an email attachment on request to loggerheadspc@btconnect.com. A reference copy is also available in the Loggerheads Library.

The Inappropriate Designation of Loggerheads as a Key Rural Service Centre

Loggerheads was arbitrarily designated as a "Key Rural Service Centre" in Policy ASP6 of the Regional Spatial Strategy. This policy will be superseded when the emerging Local Plan has been examined by an Inspector and confirmed as amended. At the time of the designation, there was said to be a requirement for "up to" 900 additional dwellings, to be accommodated on sustainable brownfield land in three key rural service centres within the Borough. Removal of the words "sustainable brownfield land" indicates a complete change of Policy. The Parish Council is concerned that this was not highlighted by either the Elected Cabinet Portfolio holder or the Planning Officers of NuLBC at a public meeting, held in Ashley on 17th August 2012, which had been arranged for them to describe the Borough's current consultation.

Loggerheads has very little sustainable brownfield land within the village envelope, as defined by NuLBC but, having looked at land availability in the other two designated rural service centres, and having taken into account building carried out since the start of the current Plan in 2006, the Parish Council's estimate of further dwellings to be accommodated under existing plans within the Parish was in the region of 50. The schedule submitted to NuLBC in September 2012 identified 55 plots, mainly for single units, in Loggerheads Parish that could be developed, without the need for any release of greenfield land. Even at that level, it was obvious that Planning Officers had taken no account of the shortfall in sustainable community facilities and infrastructure, identified in detail under the heading 'The Loggerheads Perspective' in the Parish Council's letter referred to above. If the Borough Council had taken into account the 1,829 empty properties identified within the Borough as at September 2012, a viable policy to restore them to occupation would probably have obviated the need for any further properties in this part of the Rural Area.

The Parish Council has carried out a further assessment of the case underpinning the identification of Loggerheads as a so-called "Key Rural Service Centre". It is now argued that the extension of this designation, from a scenario in which no more than perhaps 50 additional dwellings were required between now and 2026, to a position which may involve approximately 350 extra dwellings in the area, reflects a failure on the part of the Local Planning Authority to acknowledge and understand the character of the locality and the

inadequacy of the existing infrastructure. The inappropriate use of the term “Key Rural Service Centre” serves only to highlight the many shortfalls in community facilities and infrastructure required to make Loggerheads a sustainable location capable of supporting the current population.

It is now clear that the Parish of Loggerheads does not, contrary to the designation applied to it by NuLBC in its Local Plan, merit qualification as a 'Key Rural Service Centre'. An analysis of the various methodologies, employed by different local authorities throughout the UK, which underpin the concept of a 'Key Rural Service Centre', has highlighted one major and crucial shortcoming that clearly precludes Loggerheads from consideration as such; namely that a significant proportion of the residents do not, as required by such methodologies, find employment within 'the centre' itself.

Indeed, the only current way to find employment within travelling distance of the village, is to make journeys by car which by definition are 'unsustainable' in light of national planning policy. Moreover, whilst the several distinct and geographically widespread villages within the civil parish of Loggerheads do, collectively, contain some of the individual facilities such as 'a shop'; 'a public library'; 'a doctors surgery'; and 'a community centre', that typically are identified as the core elements deemed to be necessary to be able to designate a village or town as a 'key rural service centre', these individual elements are not found present together in any one of the four separate wards that together comprise the civil parish.

It is, therefore, open to question as to whether it is sustainable to create a so-called 'key rural service centre' out of a number of physically separate, small centres of population none of which, individually, would qualify for such a designation under any accepted methodology. To do so, simply because of an administrative connectivity under the guise of a single Parish Council that covers a number of scattered rural communities extending over an area estimated at 45 square kilometres, with, at its heart, what is effectively a dormitory suburb, is inappropriate. Moreover, it is not possible to travel between the four wards of the Parish by public transport.

The designation appears to be applied to the village of Loggerheads only and, in that context, the supposition that it meets the criteria of Key Rural Service Centre fails on most tests identified in that criteria.

The reality of the local economies linkage is that much of the civil parish of Loggerheads, including the village of Loggerheads itself, is an outlying part of a generic “key rural service centre”, namely Market Drayton [population 11,700], wherein many employment opportunities for residents of Loggerheads lie, notably Palethorpes, Muller (itself due to be the subject of major further expansion), Argos, Wilkinson, B & M Retail, Morrisons and in a host of other small retail and service outlets. Market Drayton is also where some of Loggerheads' senior school pupils are educated, at the Grove School/Sixth Form College [1,100 pupils/students]. The belief appears to be widespread amongst some who live in Loggerheads that they are actually residents of a 'greater' Market Drayton area, an impression fostered not only by the short distance to the town, just over 4 miles which, for most Loggerheads residents, is less than half the distance to Newcastle under Lyme town centre. Also, local thinking is influenced by the fact that all local addresses include the postal town of Market Drayton, Shropshire and the postcode 'TF'.

The Parish Council contends that it is unsound to assume that the “Key Rural Service Centre” designation, applied when only a further 50 houses were required over the remaining 14 years of the Plan, can be carried forward into a Local Development Framework which could require

approximately 350 more houses, an increase that would completely overwhelm the current inadequate infrastructure and community facilities. It is also the Parish Council's position that there should be no further development in Loggerheads until improvement of infrastructure and community facilities has been undertaken.

The Parish Council also questions the removal of seven locations identified in the Borough's original Strategic Housing Land Availability Assessment as potential housing development sites solely as a result of the political change of the Council's leadership in May 2012. Loggerheads Parish Council inspected these sites and included them in its assessment of available building plots prior to submitting its letter of 28th September 2012. It has been assumed that by including such sites in its assessment, the Parish Council was taken to have objected to their removal by the Borough Council and that objection has been duly noted.

A forecast of the development currently being considered for Loggerheads by NuLBC is attached as Annex A. It should be noted, however, that most of the sites listed fail to meet NuLBC's own criteria, as published, which states that "sites should be considered unsuitable if facilities [shops etc] are limited and there is no good access to [reliable] bus services".

As part of its continuing work since the publication of its letter of 28th September 2012, the Parish Council has produced a financial estimate of the costs of bringing facilities and infrastructure within the Parish and surrounding area to an acceptable, sustainable profile. This is attached as Annex B. It is intended that this should remind both the Borough Council and Staffordshire County Council of the extent of their neglect of the area over the course of the past twenty-plus years. If NuLBC is still minded to allow further expansion of Loggerheads, it must ensure that any development, including any on land owned by NuLBC itself, underwrites its proportionate share of the cost implications, prior to the start of any work on any site released for development. Assurances to this effect were given by representatives of the Borough Council at the public meeting in Ashley on 17th August 2012.

Summary of the Loggerheads response to current Planning Proposals as published for consideration by Newcastle under Lyme Borough Council

1. Loggerheads Parish Council is wholly opposed to the continuation of the designation 'key rural service centre', unless NuLBC enters into a legal commitment that the Infrastructure and Community Facility Improvement will be brought to the level required prior to any further housing development. A number of such improvements are still required to bring facilities into line with what should have been provided during the course of development over the past twenty-plus years. These improvements have been set out and costed in Annex B.
2. A major improvement [new roundabout] is required in the centre of Loggerheads. This is work the County Highways should have undertaken before now. To put this in perspective, how many residents are aware that County Highways recently spent over £1.8 million 'improving the A53/A51 for motorcyclists'. The Parish Council believes that money could have been used more effectively for the greater good of residents.
3. The bus service currently provided needs to be upgraded even if there is no further development. Young people in particular need reliable public transport if they are to seek work away from the village, which has no employment opportunities on offer. Annex B includes funding proposals for this improvement.

4. The existing electricity supply and drainage infrastructure are overloaded and unreliable. Extensive upgrading is required before any further development takes place.
5. Planning Policy, as published in draft, should include specific policies concerning contributions from developers towards the provision and funding of additional primary, secondary and sixth form education, together with details of how nursery provision will be provided to meet current/proposed future needs.
6. Loggerheads needs its own doctors surgery. The existing facility at Ashley appears to be over-loaded, and access, both to this and to alternative facilities at Market Drayton is very difficult for anyone who has to rely on public transport.
7. There is a need for affordable housing to be included in future plans to enable young people growing up in the village to stay here. Also, many members of the public seem puzzled by the fact that there is social/rented housing within the Parish occupied by people from outside the Parish, to the exclusion of those from Loggerheads.
8. Improved shopping facilities and associated car parking would be required in the context of development. The Planning Authority should consider a requirement for future developers to provide financial subsidies to potential retail developers over an extended period.
9. The Borough Council is urged to publish its Strategy for bringing empty properties back into use before it completes its consultations about the possibilities of releasing more land for development. It would be irresponsible to encourage development in the rural area until every effort has been made to make best use of the significant empty housing stock in the urban area.
10. When the Loggerheads Parish Plan was researched and prepared in 2008, the Parish Council established that a large proportion of residents would prefer to have no further housing development at all. Nearly 30% would have been content with one or two houses and 26% would have been content with a small development of less than 10 dwellings. Support for developments up to 50 units was extremely small. There was consistency in the responses with a large number of respondents believing that any significant development should be conditional upon improved infrastructure and community facilities. Only 8% felt that unconditional proposals for development should be considered.

In anticipation of the next stage of the consultation process being undertaken by NuLBC, it is the Parish Council's intention to consult residents on possible design parameters associated with any prospective developments. The Parish Council will continue to engage as fully as it can with residents as the process unfolds.