

Local Plan Issues Documents – Comments from Loggerheads Parish Council and Loggerheads Neighbourhood Plan Working Group

Joint Strategic Housing Market Assessment (as this is repeatedly referred to in the Housing document/section we feel it is appropriate to comment on this first)

Across the two authorities the economy is currently well below expectations assumed, erroneously, in the SHMA but this is recognised in the Economy section of the Consultation documents.

So far the original Core Spatial Strategy figure has not been achieved. Unless there is a properly costed and funded long term scheme in place to rejuvenate the local economy, it is naive to assume that the population will rise in line with national statistics, ie no job prospects equals no inward migration.

The SHMA has identified a need for between 1,177-1504 dwellings per annum across Stoke on Trent and Newcastle under Lyme. These figures do not seem to reflect any of the current or projected statistics that have been provided in the housing requirement forecasts from the Core Spatial Strategy (CSS) 2009 (855 dwellings per annum 2006-2026) or the 2012 SNHP (published Feb 2015, stating 691 dwellings per annum).

Data from the ONS predicts a population increase from 2011-2021 of 5.2% in the area; of that a significant proportion will be aged over 65. There is no link provided to any evidence from the Experian, Cambridge Econometrics and Oxford Economics on economy or employment forecasts that provides any transparent evidence to conclude that a 58% increase in housing is required in the borough. The Joint Employment Land Review, section 3.19, states that Stoke on Trent's "skills gap" is harming the city's growth prospects. This is evidence that there isn't an increase in the prospective job market in the area to currently support a 58% increase in dwellings.

The figures projected from the SHMA for the number of dwellings required seem highly unrealistic and there appears to be no transparent evidence provided in the Joint Local Plan paper, Housing Technical Paper, SHMA or supporting evidence to support this dramatic increase in housing compared to previous projected figures.

If the ONS projected household increase for the borough is applied to Loggerheads parish we calculate that with built properties for sale and current planning consents granted we already have 14 years of this requirement.

The basis of the SHMA is seriously flawed as ONS and other information has been applied incorrectly.

Housing Section

It is clear that the theoretical targets for the delivery of new housing are impaired by [a] lack of demand due to an inability by some potential purchasers to secure the funds necessary to purchase [b] lack of funding to enable RSLs to produce new-build housing and [c] the low value property market across the whole area, even in rural areas. These factors are coupled with the potential costs associated with the

reclamation of land previously used for commercial purposes [brown field land]; there is also land within the Kildsgrove and Stoke on Trent areas which has been affected by historic shallow surface mining for coal.

We are concerned by 'development pressures' in the Rural Areas, in and beyond the Green Belt as, whilst some areas have highly attractive environments, the property market is still a cheap one overall compared with most of Britain and there are considerable shortfalls in community facilities and sustainable public transport. As an example of this the current Loggerheads public transport provision does not allow travel to/from employment areas at times compatible with working hours and, with up to 500 houses having been built here in the recent past, there have been no improvements to public transport, community facilities and the matters previously set out in detail in the Loggerheads Neighbourhood Statement. The then Leader of the Borough Council confirmed, in writing, that that document reflected the views of the Residents of the Parish of Loggerheads.

It is quite clear to us that the OAN derived bears little or no relationship to the real world. It has assumed flawed conclusions regarding employment and other factors affecting housing need and it is clear from the numbers of new-build housing achieved since 2006 that even the annual target of 855 dwellings set out in the Core Spatial Strategy was an over estimate and should clearly be revised downwards.

The population analysis for Stoke on Trent and Newcastle under Lyme is noted, but the number of houses to be built cannot be realistically established until there is firm evidence of plans for economic growth being in place and delivering economic growth as forecast. Only then would it be possible to assess the number and tenure types of properties required.

To ensure sustainability future development of housing must be close to or inside the urban area and not located where it will encourage an excessive number of single-occupancy car journeys to/from work. Paragraph 2.16 is very relevant in this regard.

We are firmly of the belief that at present even the original Core Strategy housing requirement estimates were too high, as explained above. Paragraph 2.20 confirms that even this is dependent on untried and untested unknown factors.

One of your 'Key Challenges' on page 19 is over-simplified. You are already approving schemes for unsustainable development outside the urban area and remote from employment opportunities. It is essential that the provision of sufficient local facilities to support a growth in housing provision is [i] brought up to date where development has been allowed, in some cases, to overwhelm existing facilities and [ii] is greatly improved in parallel with any future development. The two authorities must find ways to utilise the extensive 'area' of brown field land in both Newcastle under Lyme and Stoke on Trent before there are any further unsustainable incursions into the rural areas that do not have the community and transport facilities to support it. Both Councils should consider using financial reserves to provide the cash-flow required to carry out the remedial work required on the brown field sites before bringing them to the market as ready development sites. In the alternative, Newcastle under Lyme owns a large acreage of potential housing development land both in and adjoining the urban area. These sites are well served by public transport and community facilities already and could be released to the housing construction market. Part of the proceeds could then be used to bring about much needed

improvements to community facilities in deserving locations with the balance of the proceeds of sale used to the benefit of Council Tax Payers.

The key challenge will indeed involve major improvements over time to generate economic competitiveness that should go some way towards retaining residents in the area. This will exclude University Students who only stay in the area whilst studying. Until improved plans are approved, costed and tested it is premature to consider a housing needs assessment. The development market is unlikely to assist with this until it has proof of security of the considerable forward investment required.

References to the shortfall between the number of dwellings given planning permission and completed housing units delivered in both Authorities illustrates a substantial error of logic within the NPPF. The issue of a planning consent in the area is not related in any way to the delivery of occupied units. That is controlled by the market which is in turn controlled by economic development and the delivery of facilitating infrastructure and financial incentives. Until that economic improvement has been secured and delivered, it is naive to speculate on housing numbers likely to be required. The annual housing completion figures quoted are meaningless without the determination of the split between houses provided by the private sector and those provided by local and central government funding. Only then will you derive a true picture of housing provision. The slight apparent improvement in the Loggerheads area is accounted for in a large part by the acceptance of discounts by vendors, many of whom have to move away from the area due to employment requirements.

Empty properties in both Council areas are a problem which is apparently being ignored. The last time we checked there were over 1800 empty properties in the Newcastle under Lyme area alone, many of them with convenient local facilities, including existing sustainable public transport links. It is essential that these properties are brought back into use. We indicated earlier that the Councils might consider using financial reserves to bring brown field land to the market in a developable condition. The same comment applies to the re-use of empty properties. Why do the Councils not renovate these properties to a standard which could make them attractive purchases or rentals within the low value market already identified? In Newcastle under Lyme the proceeds from the sale of Council owned development sites, currently available, could also be used for this purpose.

Issue 4 – Key Rural Service Centres

We agree that the existing designation of Key Rural Service Centres, and their associated village envelope boundaries, should be reviewed.

In the case of Loggerheads Parish, the Village Envelope around Knighton and Ashley should remain tightly drawn, as at present, and the only amendments to the Loggerheads Village Envelope should be the inclusion of the 'Sanatorium Development' adjacent to The Burntwood and the land recently consented in Mucklestone Road. The recent approval given at Hookgate should remain outside the village envelope as the development is clearly unsustainable.

We contend that Loggerheads should cease to be regarded/referred to as a Rural Service Centre forthwith. When the designation was applied initially, the controlling plan was the Core Spatial Strategy. That limited development in Loggerheads to brown field sites within the Village Envelope. That would have produced no more than 20 residential units in the period up to 2026. We have previously established

that neither the Borough nor Parish Council have any written evidence to support the erroneous contention that the Parish Council was consulted at the time the designation was proposed. That deprived the Parish Council of the opportunity to object to the designation when the plans proposed were examined by an Inspector.

It is a serious departure from established protocol for the Borough Planning Department to carry the designation forward in the context of the NPPF as they have never revisited the accuracy of the designation.

Review of Transport Section

Issue 1 – Walking and cycling

KEY MESSAGE:

- **The infrastructure to meet the needs of people to walk, cycle, and ride horses is limited, most notably alongside and across busy roads (such as Newcastle ring road), in the rural south of Newcastle (for walking and horse riding) and across the urban area.**

KEY CHALLENGE:

- **Providing walking and cycling infrastructure to support transport and leisure needs.**
- **Recognising and integrating connections to existing public rights of way**

“busy local roads form a barrier for walking and cycling for all but the most confident” [LP, p51]

Although this statement is quoted in the context of the urban area, I believe it very applicable to the parish, in particular the barrier formed around Loggerheads and Ashley Health by the A53 and B5026.

Staffordshire Rights of Way Improvement Plan (ROWIP)ⁱ is used to identify that in the rural areas of Loggerheads there is a mismatch between demand for walking, cycling and horse riding routes and the provision thereof. The ROWIP was drafted in 2007 and is applicable for 10 years. The demand pressure appears to be based on 2001 Census data. I can find no update on when/if the ROWIP is to be updated by the borough council (BC).

“The number of people participating in outdoor recreation is likely to increase due to an increasing number of retired people with leisure time on their hands.”

“The growth in the number of older people will, therefore, have implications for the management, maintenance and improvement of the local rights of way network as the demand for more easily accessible routes increases” [ROWIP, p16]

The above two statements appear to be particularly relevant to the Loggerheads Parish given the demographic data.

On balance we think the key message is valid to Loggerheads, we need to understand if the ROWIP is to be updated

Issue 2 – Public Transport

KEY MESSAGE:

- **The core bus network is good, with the exception of rural areas. Across both urban and rural areas there are problems with accessibility, bus punctuality, infrastructure and usage.**

KEY CHALLENGE:

- **Improving accessibility and increasing usage of bus and rail services.**
- **Working with partners to recognise and improve rural services, including cross boundary connections.**

“The Newcastle-under-Lyme Integrated Transport Strategyⁱⁱ identifies that the core bus network in the borough is good, but usage for travelling to work is low compared to other areas. This is especially so in the rural area, where bus services are less regular and the timing of services often mean that buses are an impractical means of transport for those who travel to work.” [p52]

As far as we can tell the NUL Integrated Transport Strategy [NULITS] was issued in draft form in May 2015. The Transport Technical Paperⁱⁱⁱ states that the NULITS will be subject to review throughout the development of the Local Plan.

The ‘core bus’ network referenced in the key message relates to ‘inter-urban and local routes’. A Loggerheads and Ashley Voluntary Car Scheme is mentioned to support commercial bus services [NULITS p4].

The Transport Technical Paper [p6] quotes the Staffordshire Local Transport Plan 2011; ‘improving bus services, helping residents to access services and supporting rural communities’

Neither the Transport Technical Paper nor the NULITS make any specific statements about the rural bus services or any plans to improve the service – which we assume is down to commerciality.

Loggerheads Bus Services (all times obtained from Google Bus Routes)

1st bus to Newcastle (#164) 07:41, arriving at 8:10, every 60 mins, last bus 18:21 - not applicable if work starts at 8:00am

1st bus (#164) to Market Drayton 08:39, every 60 mins, last bus 19:19. Returns start at 09:06 until 18:06

The earliest you could arrive at Muller if you lived in Loggerheads and travelled on the bus would be 09:18. The outbound journey takes 40 mins. The return journey takes 59 minutes, last departure time from Muller 17:30.

The only direct bus to Stafford (#15 B) runs on a Thursday and Saturday only, leaving at 09:02, return bus leaving Stafford at 14:10. The only other way is to take a bus to Newcastle and change for Stafford, a trip of 1hr 40mins

A bus route to Nantwich takes 2hr 30 mins

It is almost impossible to commute from Loggerheads to any locality for work that starts at 8am. It's not possible to get to Muller for a 9am start and if you were working on shifts you would have to use own transport.

The Transport Technical Paper and NULITS do not go far enough to explain specific improvements needed regarding the rural bus services, we expect that they will wait for the NP's to come in and re-assess the situation. If this was addressed it would provide a vital lifeline between the communities, especially for the young and elderly and also help to boost the rural economy as people would be able to access local shops and services, instead of commuting into the urban conurbations. It would also help to reduce the load on the infrastructure within the urban areas and improve opportunities in rural area.

Issue 3 – Connectivity and tackling traffic congestion.

KEY MESSAGES:

- **There are good transport connections to other parts of the country via the M6, A500, A50, A34 and the West Coast Mainline Railway.**
- **Transport connections within the conurbation provide less efficient movement, with high levels of traffic congestion on many routes.**

KEY CHALLENGE:

- **Improving access and internal connectivity to enable better access to services, employment opportunities and housing.**
- **Providing better access to development sites to facilitate brownfield regeneration.**
- **Improving access and connectivity will in turn help to alleviate traffic congestion on the strategic road network**

Missing information

There is reference in the Housing issues paper to the high numbers of people commuting from rural areas within Staffordshire. However there is no attempt

to address the fact that the situation will be further exacerbated if rural housing development is allowed to continue unabated and unless something is done to develop the rural economies through the provision of sustainable and appropriate rural employment opportunities.

Section 7 Heritage

Issue 1: Importance of heritage assets

KEY MESSAGE:

- The area has several unique historic characteristics that should be recognised for their positive contribution they make to the area.
- It is important to understanding the original purpose of historic buildings to help provide context and find suitable new uses.

KEY CHALLENGE:

- Heritage is often seen as a barrier to development.
- Ensuring that heritage assets have a positive impact on the environment of the area.
- Ensuring that the setting of historic assets is taken into account.

Loggerheads Parish has some 80 grade II listed buildings. These are being documented as part of the Neighbourhood Plan. Loggerheads strongly supports the concept that the setting of these assets is given priority in planning developments.

Issue 2: Conserving Heritage Value

KEY MESSAGE:

- There is a complex built heritage as a result of the pottery industry, coal mining and iron and steel industry within the urban areas.
- There is duplication in the type of civic, industrial and religious buildings in each of the towns.

KEY CHALLENGE:

- To try to increase the attraction of the area as a tourist destination based on its industrial heritage.
 - Securing funding opportunities.
- Understanding the size and scale of heritage assets as they are often large in scale due to the industrial history of the area.
- To give the right protection to historic farmsteads.

Of these challenges, the most relevant to Loggerheads is the last. We are concerned that permitted development rights for agricultural properties might be a threat to such assets.

The Shropshire Union Canal is the most relevant industrial asset which is protected by conservation area status and is a major tourist attraction as well as a valuable wildlife corridor.

We feel that the idea of using the legacy industrial built environment as a means of attracting tourists is unrealistic.

Heritage assets include the landscape and rural environment. This is not mentioned in the consultation. A local example is the battlefield at Blore Heath.

Issue 3: Integrating new developments into the existing historic setting

KEY MESSAGE:

Whilst the city does not have a large number of listed buildings they have a clear historic significance in the area.

KEY CHALLENGE:

- To protect and enhance the historic heritage and the unique character of the area by ensuring new developments are appropriate in terms of scale, location and their context.
- Understanding what important settings should be safeguarded from new development.
 - Safeguarding buildings that do not have statutory protection.
 - Encouraging sensitive reuse of historic assets.
 - Recognising focal points and integrating different forms of development.

As stated above Loggerheads has a relatively large number of listed buildings and the above objectives are all supported by us and will be pursued as part of the development planning process.

Issue 4: Rural Village Settings

KEY MESSAGE:

Newcastle-under-Lyme is characterised by a number of dispersed rural villages which form an important part of the historic landscape of the area.

KEY CHALLENGE:

- Recognising and preserving the rural settlement pattern.
- Integrating new development which meets the needs of rural areas.
- Ensuring that the setting of historic assets is taken into account.
- Recognising landscape setting and character.

Again these objectives are all strongly supported by Loggerheads.

Section 8 Natural and Rural Environment.

Issue 1: Increasing development needs and their impact upon locally designated sites.

KEY MESSAGES:

- There are large areas of local ecological and geological importance in Newcastle-under-Lyme and Stoke-on-Trent
- Future development needs may limit opportunities to improve and expand networks of locally important sites and place development pressures on existing sites

KEY CHALLENGES:

- Balancing the need to plan for new development with the protection and improvement of local natural assets.
- Plan positively to create, protect, enhance and manage a multifunctional network of green infrastructure.

The specific development needs of Loggerheads are relatively minor when compared to those of the Borough as a whole. It is important to recognise that the need for new housing to support a growing urban population must not be satisfied by building in the rural areas, particularly in view of the lack of local job opportunities and the lack of any adequate public transport.

New research findings published by CPRE show that new homes are built far more quickly on previously developed land than in open countryside. There will always be pressure from developers to use greenfield sites because they make higher profits, hence they exaggerate the problems of building on brownfield sites. In the research sample of 1040 developments, once work started brownfield sites took an average of 63 weeks to be completed against 92 weeks for greenfield sites. Unlike greenfield sites, brownfield sites are more likely to have services and transport links already in place.

Issue 2: Sustainable use of minerals

KEY MESSAGES:

- Whilst Stoke-on-Trent and Newcastle-under-Lyme are underlain by coal and clay reserves, active mineral operations in Stoke-on-Trent are limited due to the urban environment.
- The emerging Minerals Local Plan for Staffordshire (2015-30) will set policies governing the sustainable use of minerals in Newcastle-underLyme

KEY CHALLENGE:

- Balancing the need of development and mineral extraction to avoid sterilisation of mineral resources.

This is not an issue of particular relevance for Loggerheads at present.

Issue 3: The role of brownfield land in promoting biodiversity

KEY MESSAGES:

- Brownfield sites within the urban area can contain important habitats and species.
- The visual appearance of such sites and development pressures can often lead to such sites being prioritised for development over greenfield sites, despite their relative ecological value.

KEY CHALLENGE:

- Ensuring future development strategies recognise the environmental value of brownfield land as well as greenfield sites.

As Loggerheads itself has very few brownfield site this is not an issue of particular relevance to the Parish.

Issue 4: Protecting and enhancing landscape character

KEY MESSAGES:

- A range of natural assets which contribute to the local landscape are present in both areas.
- Areas of varying landscape quality are present in Newcastle-underLyme's rural area, where new development can raise both risks to the existing landscape and opportunities to improve it.

KEY CHALLENGE:

- Ensuring future development strategies safeguard characteristic landscapes in Newcastle-under-Lyme and Stoke-on-Trent, whilst taking opportunities to improve lower quality landscapes.

It is of prime importance to Loggerheads to ensure that its exceptionally high quality landscapes are protected from insensitive development.

Issue 5: Green Belt

KEY MESSAGE:

- Green Belt policy has the potential to redirect development to areas which may be of relative importance to the natural environment and landscape.

KEY CHALLENGE:

- To ensure we deliver sustainable development by balancing the need to protect the openness of the Green Belt with the need to protect and enhance areas of value to the natural environment and local landscape.

We believe that any development of green belt land should only be considered in exceptional circumstances as envisaged by the NPPF.

Issue 6: National and internationally designated wildlife and geological sites

KEY MESSAGE:

· The presence of internationally designated environmental sites within and near to Newcastle-under-Lyme and Stoke-on-Trent will be carefully considered in planning future development

KEY CHALLENGE:

· Making sure any future development strategy protects rare species and designated sites.

Loggerheads has no issue with this objective.

Issue 7: Future Maintenance of Green Infrastructure

Key Messages

· The future management of green infrastructure is likely to change as pressures are placed on public funding and partnership resources. Consideration will need to be given to different delivery mechanisms and management arrangements.

KEY CHALLENGE:

· Balancing quality and quantity in the future management of green infrastructure.

It is recognised that pressures on local government finances will require enhanced involvement by parish councils and voluntary resources to ensure that the infrastructure is suitably managed.

Economy:

The economy within the Rural South differs dramatically from the traditional Mining and Heavy Engineering that dominated the urban areas of Stoke-on-Trent and Newcastle-under-Lyme. The predominant industry within the Loggerheads Parish area is Farming and Agriculture.

Due to the limited amount of job prospects in the Loggerheads area the majority of residents commute to these places of work, with the majority travelling into the urban area. As a consequence, housing developments over the last 30 years have concentrated on family homes and the 1st time buyer has largely been ignored. This is because; **developers' profits** appear to have dictated the types of house that has been built within the area. In addition, the wholly inadequate public transport links, within the Rural South area, has made it impossible for the young to buy in the area as there is a total reliance on the car for transport.

The result of this situation is that the population within the Loggerheads area has aged significantly, in recent years, as the young cannot afford to get on the housing ladder in this area.

For the future, 3 things must happen if a younger work force is going to consider a move to the Loggerheads area.

1. Future developments must be predominantly aimed at the 1st time buyer and housing developers must not be allowed to concentrate on the family home.
2. Public transport to the rural area must be improved dramatically, to the point where the young **can** travel to there place of work without incurring ridiculous time penalties.
3. Small business should be encouraged to move into the area so that shop assistant and bar staff is not the only jobs available to the young.

Finally, if the economy is to prosper in this area and we are to achieve a more balanced population; the Newcastle-under-Lyme Planning Department must stand firm against the developers' race for profit and insist on a housing balance that has the areas best economic interests at heart.

Section **Health and Communities**

Over the past 30+ years there has been a massive growth in the number of houses within the Loggerheads Parish along with an associated population increase. Throughout this period there has remained one constant; Ashley Surgery which has not increased its footprint. As a consequence there is insufficient capacity and many Loggerheads residents are forced to register with Market Drayton Primary Care Trust. Most patients have to wait in excess of 2 weeks for non-urgent Doctor Appointments. Indeed, where ailments deteriorate patients are forced to consider using A and E which puts unnecessary strain on hospital services. Additionally, because patients are being treated by Shropshire Health they are required to travel excessive distances for hospital appointments i.e. Oswestry for Orthopaedic care. All of this is compounded by poor public transport links. For the future, additional capacity is urgently required in the area, either by increasing the Ashley capacity or with an additional facility to service the Loggerheads community.

With regard to the local community wellbeing, it is interesting to note that National Government have recently released a new policy called: Sporting Future: A New Strategy for an Active Nation.

Within this document the role of local government is referred to as follows:

“Local authorities have, and will continue to have, an absolutely crucial role to play in delivering sport and physical activity opportunities”.

The document goes on to add:

“Local Health and Wellbeing Strategies have highlighted physical inactivity as an issue that needs to be tackled and agreed approaches to tackling it. Local authorities also have responsibility for wider policy areas which can have a significant impact on the physical activity of the local population”.

Within the Strategy Sport England’s remit has been broadened so that it becomes responsible for sport outside school from the age 5 rather than 14.

The Government says, “creating a more active society **is not a choice, it is a necessity** when we face an aging population and a range of health challenges across the life course, including rising obesity amongst children and adults, and the increase in a range of long-term conditions such as diabetes”.

How does all this affect Loggerheads?

Loggerheads currently has one football pitch, located in the Burntwood, and no other sporting facilities available outside school hours. According to NULBC Playing Pitch Strategy(PPS) this pitch is a, “standard quality adult pitch with minimal spare capacity. Pitch is minimum size and is not serviced by changing rooms”. This statement is wrong. The pitch measures 93 yards by 60 yards. The FA dictates that a pitch must be between 100 and 120 yards long, for this reason the local team has to play home matches at Eccelshall football club. Hardly encouraging an active community. In addition, parents are reticent to allow children to play on the pitch as it is remote, in local woods. Because of this remoteness there have been instances where used syringes have been found around the pitch. With regard to comments in PPS to spare capacity a minimum sized FA standard pitch needs 6100sq yds to be viable or 1.26 acres. The total space available in the Burntwood site is 7211sq yards or 1.49 acres, this hardly constitutes spare capacity.

Loggerheads needs a clear and coherent policy for future health and wellbeing. NPPF refers to Open Space Policy guidance, this policy is expressed by Fields In Trust or FIT. They refer to the **6 Acre Standard**, which basically says there should be 6 acres of open space per 1000 people. This is then further refined to say, that within the 6 acres, there should be 3 acres of sports fields per 1000 people. For Loggerheads with a population of over 2800 that is in excess of 8 acres of sport pitches not the current 1.49. Indeed, we should be looking to the future and anticipate population growth, which is inevitable, and not react over 30 years too late. Indeed, another bullet point from the new policy says, “Government want health, leisure and sport to continue working closely together to fight inactivity across the country”.

As a priority “Local Government”, in this case Newcastle under Lyme Borough Council needs to address the dire facilities available to the Loggerheads Parish residents. Land needs to set aside that is fit for the Governments new strategy; this should take priority over housing development. Along with open space and sports facilities it should include a community facility that includes medical health care.