

## **LOGGERHEADS PARISH COUNCIL**

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Mr C. Collinson

By email via Mark Kirk at NuLBC

12<sup>th</sup> July 2018

Dear Mr Collinson

Response to representations under Regulation 16 for Loggerheads Neighbourhood Plan

On behalf of Loggerheads Parish Council I submit the following comments in response to the representations made to Regulation 16 for the Loggerheads Neighbourhood Plan.

**Borough Council representation:**

*“The Borough Council has an adopted Playing Pitch Strategy and Open Space Strategy, both prepared in line with NPPF recommendations and based on local needs assessment. The Loggerheads Neighbourhood Plan has used the Fields in Trust 6 Acre Standard to determine the need for play and outdoor sports facilities - this uses a national standard as opposed to a locally assessed standard. The Borough Council’s adopted policies should take precedence over any alternative method of assessing need.”*

The Borough Council, in its Open Space Strategy, quotes Fields In Trust 6 Acre standard at Paragraph 4. Indeed, it reads *“Fields in Trust (FiT) ‘Guidance for Outdoor Sport and Play: Beyond the Six Acre Standard’ were influential”*.

Furthermore the Borough has adopted some of the Benchmark guidelines as is evidenced in Paragraph 4.2 with the following comment:

*“Table1: ‘Fields in Trust’ guidelines for equipped/designated play space have been adopted in this Open Space Strategy review and should be read in conjunction with Table 2.”*

If FIT is a national standard that has been adopted by the Borough in its Open Space Strategy the Parish Council would question why is it inappropriate for

the Loggerheads Neighbourhood Plan? The research that was done for the Neighbourhood Plan is a local assessment that takes account of the significant growth in housing in Loggerheads with no related growth in sports or play facilities. It is a fact that there is no Neighbourhood Equipped Area for Play (NEAP) or Multi Use Games Area (MUGA) in Loggerheads and inadequate sports facilities.

The Borough Council Playing Pitch Strategy appears to have been carried out as a desktop study as it describes the one football pitch in Loggerheads at the Burntwood as adult standard. This statement is wrong as the pitch is below the size required for adult matches and as a consequence the Loggerheads Football team have to rent a pitch at Eccleshall in order to play league matches. Indeed, Sport England dictate the space requirements for a safe adult pitch are 106.0 x 70.0 m these dimensions are completely unachievable in the current location and the site cannot be expanded due to the adjoining Forestry Commission land and adjacent SSSI's.

### **Environment Agency representation**

"In our previous response to a Strategic Environmental Assessment Scoping Report (letter ref. UT/2006/000035/SE-03/SP1-L01, dated 31 September 2017) we had recommended further work to be undertaken as it had been suggested that development is unlikely to be affected by fluvial flood risk where the area falls within Flood Zone 1.

The ordinary watercourse flows in a westerly direction out of Loggerheads itself, and through the extended development boundary area. As this has been classified as an ordinary watercourse and only falls within low risk Flood Zone 1 as no mapping has been undertaken due to its position high in the catchment. In light of this, there may well be risk associated with this watercourse which is currently unassessed and is not shown on our Flood Map for Planning (Rivers and Sea)."

This letter was sent to Aecom who carried out the Strategic Environment Assessment for the Loggerheads Neighbourhood Plan. They include reference to this letter in the final report at section 3.1 and they state "Scope updated to consider the potential for flooding in unmapped areas." At section 5.7 in the final report Aecom concludes:

"It was recommended that Policy LNP-S2 could be amended to refer to sustainable/natural drainage systems. Following the Reg 14 Consultation, these changes were made to the policy, which ought to ensure that development at the site is more positive with regards to water quality and drainage. This is an improvement on the neutral effects that were predicted in the previous version of the SA Report. "

The Parish Council are confident that the SEA addresses the Environment Agency's issue.

### **Gladman Developments Ltd representation**

"**Policy LNPG1: New Housing Growth** Policy LNPG1 states that new housing development will be considered for approval as long as it is located within the defined village envelope. Gladman do not consider the use of settlement boundaries to be an effective response to future development proposals if they would act to preclude the delivery of otherwise sustainable development opportunities, as indicated in the policy. The Framework is clear that development which is sustainable should go ahead without delay. The use

of settlement limits to arbitrarily restrict suitable development from coming forward on the edge of settlements does not accord with the positive approach to growth required by the Framework and is contrary to basic condition (a).

Gladman recommend that this policy is deleted.

The research undertaken for the Neighbourhood Plan has been extensive and is based on local knowledge that can evidence that the village envelope reflects areas suitable for significant development that are sustainable.

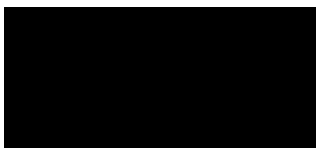
**“Policy LNPP1: Urban Design and Environment** Policy LNPP1 sets out a list of 16 design principles that proposals for development are expected to adhere to. Whilst Gladman recognise the importance of high quality design, planning policies should not be overly prescriptive and need flexibility in order for schemes to respond to sites specifics and the character of the local area. Whilst, Gladman note that the NP seeks to define different design criteria for developments in each of the 8 defined areas, there will not be a ‘one size fits all’ solution in relation to design and sites should be considered on a site by site basis with consideration given to various design principles. Gladman therefore suggest that more flexibility is provided in the policy wording to ensure that a high quality and inclusive design is not compromised by aesthetic requirements alone. We consider that to do so could act to impact on the viability of proposed residential developments. We suggest that regard should be had to paragraph 60 of the NPPF which states that: *“Planning policies and decisions should not attempt to impose architectural styles or particular tastes and they should not stifle innovation, originality or initiative through unsubstantiated requirements to conform to certain development forms or styles”*.

The interpretation section for this policy (at Page 52) recognises the need for flexibility and includes the following: “It is essential that the design process is based on an analysis of the site and context and that the design solution responds to the key characteristics of that analysis.”

Also “The policy avoids any kind of stylistic prescription, as required by the National Planning Policy Framework. Indeed, creative and innovative design solutions are especially encouraged. These will be the heritage of the 21<sup>st</sup> century. In particular, designs that incorporate low or zero carbon use are strongly encouraged”.

We have no comments on the other representations which supported our plan.

Yours sincerely

A solid black rectangular box used to redact the signature of Karen Watkins.

**Karen Watkins, MBE  
CLERK TO THE COUNCIL**