

Appendix E Neighbourhood Plan Pre-submission consultation responses 3rd November to 15 December 2017

reference	Date	Agency/resident	Response from	Comments	Response from N Plan Group
1	03-Nov	Resident	Matthew Hopson	Error on map 7 . village halls not in right place	Noted, amend map.
2	04 Nov	Resident	Daryl Smith	3.5.3 The A53 is not a “major trunk route” and is not classified as a trunk road - incorrect title. Map 3 3.3.2 & 6 Stretching a point to refer to Tyrley, Winnington and Almington as villages (hamlets) but Oakley Village is beyond a stretch! - (settlement). Map 7 Village halls do not appear to be correctly located.	Noted, delete trunk road. Noted, amend village to hamlet. Noted, amend map.
3	06-Nov	Network Rail	Diane Clarke	Network Rail has no comments.	No action needed.
4	07-Nov	National Grid	hannah.bevins@woodplc.com	An assessment has been carried out with respect to National Grid’s electricity and gas transmission apparatus which includes high voltage electricity assets and high pressure gas pipelines, and also National Grid Gas Distribution’s Intermediate and High Pressure apparatus. National Grid has identified that it has no record of such apparatus within the N Plan area.	No action needed.

5	22-Nov	Resident	A Deere	3.5.1 spelling mistake dwelling..sentence ends terraced swellings.	Amend text page 23
6	22-Nov	Resident	G Horner	Plan doesn't comment if Severn Trent have sufficient sewerage treatment for all new houses	Add comment to text re Severn trent capacity.
7	22-Nov	Resident	J Henshaw	4.3 No specific mention of car wash and derelict buildings in the centre of Loggerheads. This is the major eyesore and its redevelopment would add most to the fabric and well being of residents (in my opinion). Pride and satisfaction as to where you live and that you care and are cared for in your village is the very essence of a neighbourhood plan and has been missed . You have one comment re car wash that 16% of young people did not want it. Not sure how the neighbourhood plan is addressing the centre of the village	Add non neighbourhood plan issue re improving state of centre of village.
				Policy LNEPE2 Retail Seems the Car wash has made it as part of the retail fabric of Loggerheads. Still no comment as to suitability of a default activity on a derelict retail site.	As above
8	23-Nov	Police	David Elkington	6.3.2 (p 44) Reference to NPPF page 58 welcomed particularly reference to 'create safe and accessible environments (where crime and disorder, and the fear of crime...)'.	Noted, no action needed
				6.3.3 (p47 LNPP1) Some good crime prevention related points here, notably 1, 4, 5, 9 and 10. Suggested changes to wording: Point 1. <u>Insert</u> the word 'safe' so that is reads '...create attractive, safe and well -functioning environments, with a sense of place'.	Add word "safe"

				Point 4. <u>Amend</u> to read ‘providing active frontages to overlook public streets and spaces from habitable rooms ’. For example, a toilet window is of no use.	Word “inhabited” added.
				Point 8. <u>Remove</u> the word ‘car’- people have vans etc too! <u>Add</u> the word ‘overlooked’ in its place. <u>Remove</u> the word ‘to’ towards the end of the sentence. To read – ‘Providing a mix of overlooked parking provision, as an integral part of layout, so that parking does not dominate streets and space’.	Car removed Overlooked added
				<u>Add</u> a Point 15. – ‘Ensure fencing and lockable gating is used to deny unauthorised access to the rear of properties, positioned as close to the front of the building line as possible’.	Point 15 added
				Interpretation Page 48 Middle paragraph <u>reword</u> to ‘Active frontages means development elevations containing doors and windows in habitable rooms, so that adjacent streets and spaces are overlooked’.	Wording amended
				<u>Remove</u> the word ‘car’ from the start of the following paragraph.	Car removed
				Sport Health and Community Facilities 6.5.2 – Page 58 The inclusion of the following sentence is noteworthy – ‘In addition, parents are reticent to allow children to play on the pitch as it is remote, in local woods’. Child safety is a very important consideration when choosing play or recreational facilities. Facilities located in poorly overlooked, enclosed or out of the way places are ill-advised. As demonstrated, there can be a reluctance to allow children to use them resulting in under-use. In some circumstances they can attract anti-social behaviour and other unwanted attention that can	Noted, comment in bold added to text.

				have implications for child safety.	
				Policy LNPS2 Page 65 Site LV1 is allocated for built development for a mixed use community and sports facility. It is worth noting that this facility will not be overlooked. When the time comes for it to be designed, particularly attention will need to be given to security considerations to provide adequate deterrent to burglary, criminal damage, asb etc.	Noted. Site will be overlooked in part when Market Drayton Road proceeds. No change to plan.
9	30-Nov	Fiona Rolfe	resident	The Neighbourhood plan appears to encompass all the necessary facets to ensure the global sustainability of the Parish. My concerns are around issues such as the aging population, stresses on health and education, poor transport links and increasing traffic through the village. The village is indeed in a remarkable area, steeped in history, but needs to carefully consider the impact of development for developments sake, without considering the impact.	Noted, not neighbourhood plan issues, no action.
10	30-Nov	Matt Sheehan	resident	Firstly however, I'd like to thank all those responsible for producing the Plan - which seems to me to be an excellent document - for all the work done on behalf of and in the best interests of the residents of Loggerheads. Its' thoughtful and considered approach to appropriate development, protection and enhancement of the area over the coming decades, is reassuring and encouraging. It will be great to have this at the heart of policy making and future planning and development activity.	Noted, no action needed.

			<p>The Plan references the Residents Survey which stated that <i>"The worst thing (about living in the parish) is the appearance of the centre of the village of Loggerheads, too many/proposed developments, lack of facilities and traffic and transport issues. The traffic related concerns include speeding on the roads (69%), road layout and junctions (49%) and parking, specifically in relation to the school in Loggerheads (32%)"</i>.</p> <p>As a document designed to influence long term policy, I appreciate it's not concerned with finding immediate short-term solutions, but in relation to (1) the appearance of the centre of Loggerheads and (2) speeding, can I add the following comments:</p> <p>(1) Appearance. As a result of having visitors come to stay this weekend who said "what a lovely area but shame about the car wash and the chip shop building", it prompted me to raise this issue again and ask is there anything that can be done about these eyesores? I understand a little about the ownership background and history of the car wash - but are we really stuck with it indefinitely? Clearly, from the Survey, it's a major concern to many in the village. Allowing it to remain as is, effectively negates all the good things identified in the Neighbourhood Plan. Is there anything we can do as a community to accelerate progress on the re-development of this site?</p> <p>I also wanted to highlight the state of the two bus shelters in the centre. Both appear</p>	<p>Non neighbourhood plan issue added re improving state of centre of village.</p>
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				<p>vandalised or certainly damaged. They nicely compound the effect of the car wash, adding to the impression that the centre of Loggerheads is unloved and more like a run-down city suburb than an attractive rural village! Could we work with N-u-L Council to fund some new, perhaps interestingly designed bus shelters - something that added positively to the village appearance? There are numerous good examples across the county / country where this has been done.</p>	
				<p>(2) Speeding on the Eccleshall Road. As a regular runner and dog walker on this road (in particular the 500 yard stretch from Hugo Way to the entrance to the Burnt Wood off Chapel Lane in Hookgate. only a very small proportion of vehicles actually stick to the speed limit and a significant number are travelling well over it (50mph or more), including plenty of vans and HGVs.</p> <p>Please could the PC take this issue up again? The existing signage clearly isn't working. Most cars coming in from Eccleshall ignore the big 30mph signs and just continue at relatively high speed until they get close to the school entrance area. Going the other way, drivers accelerate up the hill away from the shops thinking they're now out of a residential area and on a rural main road. Electronic speed warning signs that flash when the limit is exceeded appear to be the most effective means of ensuring vehicles stick to the limit. What would need to be done to have a couple of such</p>	<p>This is not a neighbourhood plan issue, outside remit and County Council Highways responsibility but the Parish Council supports the Speed Watch group and is considering another flashing sign.</p>

				signs installed between the centre of Loggerheads and the exit from the 30mph zone in Hookgate? Otherwise I don't see how the current situation which is dangerous, unpleasant and affects quality of life in the village, is ever going to change.	
11	04-Dec	Highways England	Graham Broome	Nearest section of Strategic Road Network (SRN) is M6 south of Nul, approx 6 miles from Loggerheads parish. The LNNP gives extensive detail on its drive to promote sustainable alternatives to private motoring and the principle of this is welcomed by Highways England. In terms of housing, it is noted that there is a current permitted and potential supply of 391 dwellings. The majority benefits from consent given the planning status of the sites and the remoteness of the M6 this does not give rise to any concerns in relation to the SRN. It is concluded that the implications of the objectives contained with the LPNP are anticipated to have minimal or no direct impact on the SRN. No specific comments to make.	Noted, no action needed.
12	13 Dec	Staffs County Council	Mike Winks, B.A (hons), Strategic Planning Advice Manager, mike.winks@staffords hire.gov.uk	<p><u>Objection to County Council land off Hugo Way, Loggerheads, being included as Local Green Space (Policy LNPP4)</u></p> <p>The County Council objects to this allocation for the following reasons:</p> <ol style="list-style-type: none"> 1. The land was originally purchased back in 1966 as part of a larger area of land (11 acres) required for educational purposes. Approx. 8 acres have since been sold for housing. The land is leased on a temporary basis to the Parish Council until its future 	Objection noted. Proposed designation reviewed and refuted on basis that allotments are of significant community value, comply with NPPF criteria and the Newcastle under Lyme Borough Council Open Space Strategy states: "Only the provision of allotments (in borough) is below the set standard."

				<p>has been decided.</p> <ol style="list-style-type: none"> 2. The remaining land (3 acres) currently leased to the Parish Council is no longer required for any future expansion at Hugo Meynell Primary 3. The allotments are only a temporary use and are not statutory allotments, thus do not need the Secretary of State's consent to dispose of them, and thus do not need relocating elsewhere 4. The land has previously been promoted in the Strategic Housing Land Availability Assessment (SHLAA) with Newcastle BC as a possible future housing site 5. This land is within the village envelope and its use for housing supports policies LNPG1, LNPG2 and LNPT1 in the draft Neighbourhood Plan. It is a good sustainable site that meets all the criteria in national planning policy guidance (NPPF), being close to public transport, shops, community facilities, etc. 6. Congestion outside Hugo Meynell Primary school at certain times of the day is recognised by the local community as an issue, and a housing development on this land could help provide a solution to this problem. 	
13	15 Dec	Resident	Carol & Nick Wright n.wright725@btinternet.com	We write as owners of Molescombe House, Charnes Road, Ashley, TF9 4LW We note that part of our garden is excluded from	The village envelope around Molescombe House is the original Borough Council development boundary that has only been extended for the

				the Ashley village envelope and would like to understand why this is the case, when no other property with a garden has any or all of their garden excluded from the village envelope.	Neighbourhood Plan to allow for development at Bell Orchard on the opposite side of Charnes Road. The intent is to keep development within the urbanised area of Ashley. Houses have been included within the envelope. It is not the intent to include large gardens.
14	15 Dec	Sport England	Rajvir Bahey	LNPS2 p65 Sport England does not endorse Fields in Trust Standards with it instead working with local authorities to ensure the Local Plan's are informed by an assessment of need & strategies for indoor and outdoor sports facilities in line with NPPF para 73. ...should NuLBC not revisit the Playing Pitch Strategy 2015-2020 relevant planning policies in a Neighbourhood plan should be based on proportionate assessment of the need for sporting provision in the area. LNPS3 p 67 & interpretation does not adequately reflect and comply with NPPF (para 73 & 74) and Sports England playing fields policy.	Fields in Trust (Angela Lewis) did confirm to us the standards are done with Sport England. We have written to her again to seek further feedback. Wording changed to reflect NPPF
15	15 Dec	Staffs County Council	James Chadwick	Section 6.4 of the plan covers Transport and Movement and sets out the rationale and evidence for the subsequent policy LNPT1. It is noted that the evidence identifies gaps in footway provision and the policy seeks development to address these where relevant to their site. However, in the interpretation section the Plan then references potential for S106 or CIL monies to be directed towards transport infrastructure that does not feature in the Rationale and Evidence section. We note that the Plan contains a section on Non-neighbourhood Plan Issues. Under section 7.2 parking problems at Hugo Meynell School are	Noted, text will be clarified in evidence and rationale. Noted, no action needed.

			<p>listed as a matter the Parish Council will engage with the school and Highway Authority over. However, elements of this are covered through the Plan by improving pedestrian accessibility in the village.</p> <p>It is also noted that within the parcels of land allocated for Local Green Space (LGS) designation you have included the allotments adjacent to Hugo Meynell School. The land on which the allotments site is within Staffordshire County Council ownership. Given the allotment site shares a boundary with the school has any consideration been given to the allotment site and any potential that may exist therein to address the parking issue and re-allocation of the allotments elsewhere? We would therefore suggest that the allocation of the allotment site as a LGS be reconsidered and a meeting be convened with the County Council to discuss ahead of the plan being formally submitted for examination.</p>	<p>Parish Council met with SCC in November 2017 to discuss future of allotments and need for parking for school. The Neighbourhood Plan groups has reviewed the proposed Proposed designation reviewed and refuted on basis that allotments are of significant community value, comply with NPPF criteria and the Newcastle under Lyme Borough Council Open Space Strategy states: "Only the provision of allotments (in borough) is below the set standard."</p>
			<p>Consideration should be given to including a specific planning policy within the Neighbourhood Plan to address the reuse/conversion of historic farmsteads to ensure they are appropriately conserved and enhanced and to ensure their continued contribution to the wider landscape character. It is advised that such a policy should make reference to the Staffordshire Farmsteads Guidance. Alternatively, in order to make it explicit that policy LNPP1 and/or LNPP3 includes the historic farm buildings, reference to them and their contribution to the parish could be included within</p>	<p>Paragraph has been added to the interpretation for LNPP1 and LNPP3 to the effect that any Planning applications that relate to farmsteads will be considered by reference to the Staffordshire Farmsteads Guidance.</p>

				the Interpretation section(s) with reference to the Staffordshire Farmsteads Guidance.	
				The Heritage Assets reports make reference to the archaeology of the parish which, whilst currently poorly understood, has not been highlighted within the Neighbourhood Plan document. It is advised that consideration be given to include a planning policy within the Neighbourhood Plan to take account of the potential for the survival of above and below ground archaeology. Alternatively the plan could make reference to both the National Planning Policy Framework (Chapter 12), which identifies various aspects of the historic environment, including archaeology, as a material consideration within the planning system.	Reference to NPPF added and reference to archaeology.
				There are references within the Neighbourhood Plan to 'statutory protected' heritage assets, although a non-statutory protected heritage asset (the registered battlefield) is present within the parish (see specific comments below). To avoid misunderstanding and complications around these issues it may be appropriate to consider altering all the references to statutory protection to the all-encompassing 'designated heritage assets' in line with the terminology used by NPPF.	Wording has been amended to use "designated heritage assets".
				Section 3.1 History of the Parish of Loggerheads (page 9) - the archaeological evidence, mostly from stray finds, suggests human activity within the modern parish from the Neolithic-Bronze Age.	Sentence added to page 9.

				<p>Section 3.3.2 Historic Character (page 11) - in the list of designated sites the scheduled monuments should be split out from the 96 monuments to highlight their status as statutory protected (designated) heritage assets. It is advised that the text relating to the 96 monuments be amended to read '96 non-designated archaeological sites and monuments recorded by the Staffordshire Historic Environment Record, which is managed by Staffordshire County Council'. If the 96 monuments include the historic farmsteads and other historic buildings then it may be more appropriate to describe them as 'non-designated heritage assets'.</p> <p>Section 3.3.2 Historic Character (page 11) - in the list of assets Blore Heath battle site should be described as 'registered battlefield' to acknowledge its status as a non-statutory designated heritage asset (cf. Historic England website https://www.historicengland.org.uk/listing/what-is-designation/registered-battlefields/).</p> <p>Section 3.3.2 Historic Character (page 11) list of assets - the list does not identify the individual assets or describe where these assets are located. Consequently it is advised that cross-references be made to where this information can be found as appropriate (for example within the Heritage Asset reports and/or the relevant figures (notably Map 4) within the Neighbourhood Plan).</p>	<p>Text at p11 amended.</p>
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			Section 3.3.6 The Importance of Open Countryside for the Parish (page 16) – as highlighted in the general comment (above) the contribution of the historic farmsteads could be considered for inclusion within this section	Reference to historic farmsteads has been added to Historic Character
			Chapter 6.3 Place & Heritage; Section 6.3.2 (page 44) - NPPF themes final bullet point should read 'conserving and enhancing the historic environment'	Bullet amended
			Section 6.3.2 (page 45, paragraph 1) - A review of what defines a heritage asset may be useful at this point (cf. NPPF Glossary). At present the description is very much weighted towards the historic built environment and landscape character, but it is advised that archaeology be included within this description as making a positive contribution to the history and character of the parish. It is also noted that NPPF extends the protection of setting to all designated heritage assets in addition to listed buildings and Conservation Areas. In the context of Loggerheads this will include the registered battlefield and the scheduled monuments.	Definition amended
			Section 6.3.2 (page 45, paragraph 3) - The area contains a range of statutory and <i>non-statutory</i> protected heritage assets (see general comments above). The registered battlefield is a non-statutory protected heritage asset (see comment above and link to Historic England webpage). The conservation and enhancement of non-statutory protected assets are given great weight within NPPF alongside the statutory protected heritage	Text amended and cross references added

				assets (e.g. listed buildings and scheduled monuments). The area also contains a wealth of non-designated heritage assets including archaeology and historic buildings (including farm buildings) which all contribute to the heritage of the parish and consequently it may be useful to include reference to these assets in this paragraph with a cross-reference to the relevant Heritage Assets reports where they are considered in greater detail.	
				Section 6.3.2 (page 45, paragraph Map 4) – to avoid ambiguity and inconsistency it is advised that ‘ancient monuments’ be changed to ‘scheduled monuments’ within the paragraph and in the title of Map 4 on page 46.	Text amended
				Map 4 – it is advised that the Listed Buildings and the registered battlefield be included. It should be noted that there may be future additions and amendments to these designated assets and consequently the map only shows those which are currently protected or the current extent of the protected areas and that there could be changes to the map during the life of the plan.	Reference to heritage book where maps are located added to text.
				Policies (p.48) - as noted in the general comment above consideration should be given to the inclusion of further policies for historic farmsteads and archaeology.	References to NPPF and variety of designated heritage assets, general policy covers these.

				<p>References to <i>Planning for Landscape Change</i> are welcomed, however there are some key characteristic features that it would be beneficial to mention in addition, and further evidence that could be used to support and reinforce the desire to protect and enhance the setting of the villages and the character of the surrounding countryside.</p> <p><i>Planning for Landscape Change</i> identifies two Landscape Character Types within the Plan area Sandstone hills and Heath (farmland and Estatelands variants) and Sandstone Estatelands. The Sandstone hills and Heaths types occupy higher, often strongly undulating ground to the south of the area, with characteristic intimate steep sided wooded valleys; small woodlands and copses; and ancient narrow sunken lanes with sandstone banks. The more open Sandstone Estatelands lies in the west of the Plan area, and is an area of more intensive arable farming, again with woodland cover but where hedges are in decline and being lost and where there are more open views. <i>Planning for Landscape Change</i> assigned policy objectives, derived from the assessment of factors such as representation and condition of characteristic landscape features, time depth, and the occurrence of semi- natural habitat. Much of the Plan area falls within policy objectives of Landscape Maintenance and Active Landscape Conservation, indicating strong representation of characteristic features in good condition. In addition much of the Plan area to the south and</p>	<p>Additional information on landscape has been added to page 13 & 14</p>
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				<p>west of Loggerheads and around and to the east of Ashley were identified of highest sensitivity to change. This supports objectives of landscape protection and enhancement. Further information and a User's Guide can be found at https://www.staffordshire.gov.uk/environment/eLand/planners-developers/landscape/NaturalEnvironmentLandscapeCharacterTypes.aspx . Further detail of the spatial distribution of character types, policy objectives and sensitivity can be found at https://apps2.staffordshire.gov.uk/WEB/OnTheMap/NatureandWildlife</p>	
				<p>Policy LNPP1 is supported, particularly regarding retaining trees and hedgerows and providing high quality planting and landscape design. In the case of development on the edge of villages policy wording that seeks creation of a strong Green Infrastructure buffer on the interface between urban and rural to buffer the surrounding landscape from development would be welcomed.</p>	<p>This has been added into LNPP1</p>
				<p>It is acknowledged that the changes to the Village Envelope are in many respects a result of planning consents already granted and therefore to bring these areas into the village. However, one of the areas identified as a settlement extension includes ancient woodland at Burntwood. When read alongside Policy LNPG1 it could be taken that development in the ancient woodland may be acceptable as it's is now within the Village</p>	<p>Village envelope boundary has been redrawn to exclude this woodland.</p>

				<p>Envelope. It is assumed that this is an unintended consequence of drawing the boundary around consented development but does therefore leave the Plan at odds with the National Planning Policy Framework and Policy CSP4 – Natural Assets in the Newcastle-under-Lyme and Stoke-on-Trent Core Spatial Strategy to allow development on an ancient woodland site. NPPF s. states:</p> <ul style="list-style-type: none">• if significant harm resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused; and• planning permission should be refused for development resulting in the loss or deterioration of irreplaceable habitats, including ancient woodland and the loss of aged or veteran trees found outside ancient woodland, unless the need for, and benefits of, the development in that location clearly outweigh the loss. As ancient woodland is of national importance it would be expected that only development of that status (e.g. HS2) where an alternative site could not be found would be permitted. The Newcastle-under-Lyme and Stoke-on-Trent Core Spatial Strategy states: The loss of irreplaceable natural assets will not be accepted.	
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				<p>It is suggested that the settlement expansion proposals are re-drawn to exclude the ancient woodland or policy added making clear that no development will be permitted that has an adverse effect on ancient woodland, including plantation on ancient woodland sites (PAWS). It should be noted that a buffer is required between new development and ancient woodland of between 15 and 50 metres to avoid impacts. It is recommended that Natural England/the Forestry Commission be consulted on the buffer required in this location. Guidance on ancient woodland is found in the Standing Advice https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences</p>	
				<p>The plan includes Sites of Special Scientific Interest (SSSIs) in a list of historic designations within section 3.3.2 Historic character. As SSSIs are designated for biodiversity value it would be more appropriate to either rename this section Historic and Natural Character or to include these in a separate Natural Character section with other natural environment assets. The SSSI is in fact single one - the Burntwood SSSI is comprised of several ancient woodland blocks within a wider area of ancient woodland. Ancient woodlands have been in situ since at least 1600 and are among the rarest and most diverse habitats in Britain and are considered irreplaceable. Loggerheads Parish boasts a significant group of these woodlands many of</p>	<p>SSI's have been deleted from historic character section and added to new section called Natural Character</p>

			<p>which are designated as Local Wildlife Sites and which complement SSSIs in protecting biodiversity. There is potential for enhancement of these woodlands, particularly where they have been planted with conifers, to be achieved through such means as the HS2 Woodland Fund. The Parish is within the wooded Quarter Ecosystem Area in the Staffordshire Biodiversity Action Plan where the priorities are to protect, expand and join up native woodland and wood pastures and parkland. Maintaining and enhancing the hedgerow network contributes to linking woodlands together and allowing rare and protected species to move through the landscape to feed and to breed.</p>	
			<p>Aim 1: Heritage & Place: To promote, protect and improve access to natural and built heritage is laudable but it is recommended that this should take account of heritage asset sensitivity. Rewording is recommended to state for example: To promote, protect and enhance natural and built heritage and improve access where this does not conflict with conservation of the assets.</p>	<p>The aim has been extended to include last part of sentence.</p>
			<p>The Neighbourhood Plan includes no policy for protection of wildlife and natural assets other than a reference in LNPP1: Urban Design and Environment to retaining trees and hedgerows. This means that National and Local Plan policies will apply with no opportunity to take account of local circumstances.</p> <p>.</p>	<p>National policy and Local Plan policies are considered to be sufficient to cover</p>

			<p>There is some mention within the plan regarding the public rights of way network within the Strategic Context (3.2), Landscape Uses (3.3.4) and The Importance of Open Countryside for the Parish (3.3.6) sections. The sections comment that the Public Rights of Way in the Parish are "abundant", "well used" and form a "good network" with a "range of circular walks". There are no further direct references however, in several of the Policies - 6.4 Transport & Movement, 6.5 Sport, Health & Community Facilities it is recognised that having safe and appropriate routes to walk are an aim of the Plan.</p> <p>We welcome the overall intention of the Neighbourhood Plan to seek the enhancement of the opportunities to walk/ cycle and ride within the Parish. We also welcome the recognition that public rights of way can form a key part in promoting health and wellbeing and the future sustainability of a community. There needs to be some recognition that this coincides with reduced funding for rights of way work and there will be an increased need for the local community and parish council to become more heavily involved in the maintenance of their local path network.</p> <p>We would comment that the parish council should, through the plan, encourage developers to enhance the existing path network where possible in line with Staffordshire County Council's Rights of Way Improvement Plan. This could include:</p> <ul style="list-style-type: none"> - the creation of public bridleways or the 	<p>Noted. The transport policy focuses on incorporating well-connected and permeable pedestrian networks; where not already in place, footways (pavements) are provided to link the site to the existing footway network rather than public rights of way which are considered to be well provisioned in the parish. The Parish Council has an active Footpaths Committee which does work with Market Drayton Ramblers to maintain public rights of way.</p>
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				<p>upgrading of public footpaths to bridleways to improve provision for horse riders and cyclists.</p> <ul style="list-style-type: none"> - the creation and promotion of short circular walks to promote the health benefits of walking - the replacement of stiles with gaps (where there are no stock) or gates (where there are) in line with Staffordshire County Council's Least Restrictive Principle for path furniture <p>The Rights of Way team would be happy to provide advice and work together on any schemes which benefit residents through improvements to the path network.</p>	
				<p>It is noted that the Plan makes reference to high speed broadband access. However, the situation is a little more complex than presented in the Plan. Government has recognised that improved connectivity is revolutionising our quality of life, from how we work and how our children learn, to how we spend our leisure time, how we do our weekly shop, and how we engage with public services. The Broadband Delivery UK programme of activity was set up to address historic market failure, addressing the areas that are not considered commercially. However, it does not cover new development sites. New sites should be planned so that these vital services are designed into the development from the outset, and should</p>	<p>Proposed policy wording adopted in plan.</p>

			<p>not require a public subsidy to make them commercially viable. Should new developments be completed without access to high speed broadband there are no guarantees that publically funded programmes would address this issue.</p> <p>The development of new sites should have access to high-speed (>30Mbps) broadband planned in from the outset. If the developers engage with the network operators at the start of the planning process, they will generally be amenable to supplying access to the required infrastructure at little or no cost to the developer. In fact they will generally supply the ducting and pay for the ducting to be installed at the same time as the other utilities. Both Openreach and Virgin Media have new sites development teams set up to facilitate these requests. Other network operators may have similar arrangements.</p> <p>The telecoms ducting needs to be installed at the same time as gas, water, electricity and waste utilities are laid in the ground. If network operators are approached after this work has been completed, then the additional cost of opening up new trenches in the footways and requirements for full width reinstatements can have a detrimental impact on the commercial viability of the provision of service. In addition the retro fit approach can be highly disruptive to the site, business and residents. We are aware of instances of this occurring across the country as it appears there is currently no other regulations/legislation</p>	
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				<p>to require new properties to have high speed broadband infrastructure provided during construction.</p> <p>In light of the above it is suggested that the Plan policy needs modifying to ensure new sites are constructed to be either pre-connected to high speed broadband or have suitable infrastructure provided/pre-installed during site construction to facilitate easy provision at a later date post occupation. The following policy wording is suggested for consideration:</p> <p><i>'Sites allocated for residential and commercial development in the Plan should be served by high speed broadband (>30mbps) unless it can be demonstrated through consultation with Next Generation Access Network providers that this would not be possible, practical or economically viable. In all circumstances during construction of the site sufficient and suitable ducting should be provided within the site and to the property to facilitate ease of installation at a future date.'</i></p>	
16	14 Dec	Newcastle under Lyme Borough Council	Claire Coombes	<p>1.4 pg 4 The duration of the plan is stated to be from the date of the referendum to the end of 2033.</p> <p>Paragraph 1.4 conflicts with the front cover of the plan, which suggests the plan period is 2013 –</p>	Change p4 to 2013

			<p>2033. This timescale also matches the evidence base such as that set out in the Housing Needs Assessment and this is the baseline date that should be used.</p> <p>It is also relevant to note that subject to a successful examination, the plan will become a material consideration for planning applications before it reaches the referendum stage.</p>	
			<p>3.2 pg 9The plan refers to Loggerheads comprising 3.6% of the Borough’s population. This figure conflicts with the Housing Needs Assessment June 2017 v2 which refers to Loggerheads comprising 3.4% of the Borough’s population (para 2.5).</p> <p>It is recommended that the figures are reviewed to ensure a consistent figure is used.</p>	<p>NO – 3.4% is households and is correct at para 2.5. Population is 3.6%.</p>
			<p>3.3.2 pg 11The plan area contains locally listed buildings. Policy LNPP3: Local Heritage Considerations relates to non-statutory heritage considerations. Consideration could therefore be given in this section to identifying the non-statutory heritage assets in the plan area, for example the historic setting of settlements and locally important buildings.</p> <p>It is important to identify these because Policy LNPP3: Local Heritage Considerations references non-statutory heritage and conserving buildings and their settings. It would be helpful to understand what Policy LNPP3 is seeking to</p>	<p>LNPP2 and 3 integrated into one.</p>

				protect.	
				3.3.7 pg 17 See comments on Policy LNPP4: Local Green Space. where there is little information in the Plan about the location of the proposed areas, any description of them or how they meet the criteria found in national guidance.	Information added to plan.
				5.1 pg 31 The plan states that the planning strategy is to focus on 'well designed development to meet identified needs'. This includes housing within (our emphasis) the built up areas of Loggerheads village and Ashley. However, elsewhere the plan suggests that Ashley is not a suitable location for housing growth (for example pages 34-36). The supporting text, policies and proposals within the plan should be consistent within one another.	Ashley deleted from bottom of page 31, strategy focuses on Loggerheads village.
				6.1.1 pg 34 The housing growth strategy aims to enable the growth of settlements within (our emphasis) Loggerheads to meet local need. Furthermore paragraph 6.1.2 specifies that growth is essential to meet local need. However, the plan does not seem to address the other key issue identified that is that there is a mismatch between the housing that has been delivered and/ or permitted and the types of houses that are needed. The boundaries of the village envelopes could be challenged because there does not appear to be scope to address this	Existing outline permissions will be influenced by this policy and any infill. This sentence has been added

			<p>need within the village envelopes.</p> <p>It should be explained how this is consistent with the adopted development plan namely the CSS which identifies Loggerheads as a Rural Service Centre and a sustainable location for development.</p>	
			<p>6.1.2 pg 35 The rationale for changing the village envelopes for Loggerheads and Ashley doesn't appear to be sufficiently justified therefore it is suggested that the reason for changing the boundary is made clearer. The reason for changing the boundaries appears to be in order to reflect development that has been permitted.</p> <p>Note: there may be a discrepancy between the western boundary of the Market Drayton Road site (17/00067/DEEM4) and the proposed village envelope at this location and it is suggested that this should be checked.</p>	<p>Justification has been reviewed.</p> <p>No we include all BC owned land at this site, not just that included in application 17/00067</p>
			<p>The title of Map 3 pg 37 identifying a village envelope for Ashley is incorrect.</p>	<p>Amended</p>
			<p>6.1.2 pg 38 The plan suggests that there are highway pressure points within the area. It is unclear from the plan what evidence has been gathered in terms of highway considerations. Without this, it would be difficult to justify the transport infrastructure improvements funded by development as outlined in the Transport and Movement section at 6.4, page 56.</p>	<p>Evidence reviewed and added to website.</p>

			<p>Policy LNPG1 pg 39 The Policy suggests that new housing development 'will be considered for approval within the village envelopes'. The wording of the policy may be clearer if it reflected the sentiment of the growth strategy which appears to be that new housing development will be primarily directed to the village envelope of Loggerheads village where it can support sustainable patterns of development.</p> <p>This approach broadly complies with Policy ASP6 of the CSS which identifies Loggerheads as a key rural service centre where development will be allowed within the village envelope.</p> <p>The scope for growth within the village envelope is not clearly explained in the growth strategy and without this it appears to be an omission that the option of amending the village envelope to accommodate new growth has not been considered. Provision for reviewing village envelopes is set out in paragraph 5.203 in the CSS. If it is the case that the Parish Council consider that extant planning permissions already meet the local housing need then this could be more explicit in the main document. Without it being clear that there is scope for new development within the village envelope, it is difficult to see how the objective of encouraging mixed use development as set out in the supporting text is likely to be achieved.</p> <p>It is noted that in the Policy, that outside of the</p>	<p>The policy has been amended to refer to just Loggerheads</p> <p>Wording re Extant permissions and growth clarified.</p> <p>Policy re infill checked and some words amended but curtilage not added.</p> <p>Scale added</p>
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			<p>village envelopes, infill housing will considered positively, unless it will lead to the loss of garden space, amongst other criteria. To support infill within the village envelopes, consideration could be given to a policy that supports the development of dwellings within the curtilage of existing dwellings subject to criteria. Outside of the defined village envelopes, the policy could set out the range of circumstances in which housing development will be permitted. For example, limited infilling in an otherwise built up frontage, replacement dwellings, conversions of existing buildings, affordable housing etc.</p> <p>The policy states that infill will be considered for approval outside of the village envelopes. Neither the policy or text provides an explanation of what scale of housing would be considered appropriate as infill. Is it a small gap in an otherwise built up frontage for a couple of dwellings or would larger sites be considered appropriate? When making decisions on proposed infill development, it would be helpful if the policy or supporting text provided more information.</p> <p>In order to 'future proof' the plan, consideration could be given to clarifying that development will be directed to the village envelope of Loggerheads or any extended village envelope boundary that may be established by a Local Plan.</p> <p>It may not be necessary to include criteria in this policy to set out that development should not</p>	<p>Plan will be reviewed when Local Plan adopted.</p> <p>Wording clarified.</p>
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				<p>harm residential amenity/ be designed to complement existing housing as these requirements could be covered in the Urban Design and Environment Policy LNPP1 and/or found in existing development plan policies.</p>	
				<p>Policy LNPG 2 pg 43 In order to redress the imbalance of the current housing stock and to ensure a full mix of housing in the Parish, the policy seeks to ensure that a third of new homes on sites of 10 or more dwellings are one or two bedroom properties. Constraining supply by only allowing infill outside a village envelope is unlikely to deliver this mix. Other Neighbourhood Plans have included policies which allow for some small scale housing development adjacent to village envelopes on the condition that it provides housing of a mix that reflects the area’s need for smaller dwellings.</p> <p>It is important that the policy recognises that there may be instances where this mix cannot be achieved. Therefore it is suggested that the policy recognises that viability and/ or other material considerations may justify a different mix.</p> <p>It is understood why the policy seeks to ensure affordable housing is always provided on site rather than via a financial contribution but in practice, viability and/ or other material considerations may justify a different approach.</p> <p>It is not clear from the policy or text whether the requirement for a third of new dwellings to be smaller units would be an additional requirement</p>	<p>Have not added as do not wish to cause uncertainty.</p> <p>This could happen anyway if “material considerations indicate otherwise”. Not a good idea to weaken the policy.</p> <p>Sentence added to page 43 to clarify.</p>

				on top of any affordable housing requirements under CSS Policy CSP6: Affordable Housing.	
				<p>Policy LNPP1 pg 47 While the policy contains a number of sound urban design principles, they appear to be generic in their approach. The text at page 45 states that there is a good understanding of the distinctive character of the villages in the Parish and that evidence of this can be found in the Character Area Assessment. It is not clear from the design policy how this evidence has informed the policy or how the criteria will deliver development that promotes local distinctiveness.</p>	<p>The design policy is about good urban design, but is then augmented by the following character policy, which is more specifically local in nature.</p>
				<p>Policy LNPP2 pg 49 This is a good attempt to protect and enhance the character of the built environment, however the policy could be open to interpretation.</p> <p>It appears that a much more flexible approach is proposed to the design of development in Loggerheads village compared to other settlements. If this isn't the intention, it may be necessary to reconsider the wording of the policy.</p> <p>In Mucklestone, the policy states that development should incorporate stone (not reconstituted) into the palette of materials. However many of the buildings within Mucklestone are constructed of brick. Is it particular features, for example stone walls or window details that the policy is seeking to encourage?</p>	<p>Yes a more flexible approach for Loggerheads.</p> <p>LNPP2 and 3 integrated and conservation areas removed as protected by other policies.</p>

			<p>The policy does not describe natural features or the setting of settlements or any views that may be important.</p> <p>Tyrley is the canal conservation area and it would be useful to specify this. The map seems to just show a section of it and it is a linear Conservation Area. It may be the scale of the map or that the policy is focusing on the group of buildings at Tyrley Locks? This could be made clearer. The character of this area is protected significantly by the fact that all the buildings and canal structures are listed buildings – the canal setting is a fundamental and distinct part of its character, history and why they are there.</p>	
			<p>Map 5 pg 51 A clearer map showing the extent of each character area should be included within the plan. It could be difficult for an applicant or a decision taker in applying the policy to Identify whether a site is located within a character area using the plan that is provided.</p>	<p>Agreed, map to be enhanced.</p>
			<p>LNPP3 pg 52 The purpose of this policy, its justification and wording is unclear as drafted. Whilst it is appreciated that there is an intention to protect the ‘particularly sensitive character’ of the named villages, it is not explained what this is. Therefore the policy could be open to interpretation.</p> <p>It may help to consider the following questions. Is the policy intending to identify locally important, non statutory heritage assets? If so what are they?</p>	<p>Policy LNPP3 integrated with LNPP2</p>

				<p>Is it the whole of a village? There may be some areas within those villages that are more sensitive to change than others. Is the policy suggesting that all buildings within these areas should be conserved? As drafted this policy is unlikely to comply with national or local planning policy.</p>	
				<p>Policy LNPP4 pg 53 It is difficult to comment on this policy at present. This is because the plan provides no list of the proposed local green space designations or any written description about them. No evidence is presented to demonstrate how each area meets national planning policy in terms of the designation of local green space. Map 6 is not sufficiently clear to enable the physical boundaries of the local green spaces to be ascertained.</p> <p>This justification is necessary in order to be satisfied that the plan meets the basic condition of complying with national policy.</p>	<p>A designation section has been included.</p>
				<p>Policy LNPT1 pg 55 seeks to deliver improvements but it is very generic and it is not clear how the policy will address the issues identified in 6.4.</p>	<p>Wording reviewed and amended</p>
				<p>6.5 pg 57 Previous advice has been given as follows:</p> <p><i>The plan makes reference to the NPPF and open space policy guidance, referencing the 6 Acre standard produced by Fields in Trust which is not recognised by Sport England as relevant planning</i></p>	<p>The evidence has been reviewed and further explanation added to text.</p>

			<p><i>guidance. In order to provide the DLNP with the greatest amount of credibility, the starting point for strategic evidence of need should be the Council's adopted Playing Pitch Strategy which was adopted in 2015 and the recently adopted Open Space Strategy which is relevant guidance. If the DNLP intends to apply different standards to that set out in the Playing Pitch and Open Space Strategies for the area, then this will have to be justified.</i></p> <p><i>It is not possible to selective about the evidence used and there should be consistency where possible. At the moment the approach that has been adopted would create a potential conflict which needs to be resolved in order to meet the basic condition of conformity with the Joint Local Plan and its evidence base.</i></p> <p>It is considered that the approach to sport facilities is unlikely to meet the basic condition of complying with strategic policy because it is based on evidence from the Fields Trust and dismisses the Borough Council's latest evidence.</p> <p>Paragraph 6.5.2 states that the Burnt Wood football pitch cannot be developed as it does not meet FA league standards. This may be the case for adults but it could meet standards for under 16's and mini soccer pitches with some improvements.</p>	<p>The police response is clear that site is not suitable as not overlooked and unlit.</p>
			<p>Page 63 The draft plan states that the choice of sites LV1 and LV2 for community and sports</p>	

			<p>purposes was based on a number of factors, one of which is that the feasibility and needs assessment has indicated that new sports facilities are needed and would be viable.</p> <p>However this appears to contradict with the Urban Vision Proposed Feasibility Study May 2017 which is one of the documents referred to as forming part of the evidence base for the plan. Section 4 concludes that the Parish Council's preferred option would be unachievable for a number of reasons, including there being no guarantee that the land or funding will become available. The feasibility study considers a site area that differs from proposed allocations LV1 and LV2.</p> <p>If the policies and proposals are to be implemented as the community intended a neighbourhood plan needs to be deliverable.</p>	<p>We explain why site is different. Viability issue is addressed in the Basic Conditions Statement.</p>
			<p>Policy LNPS1 pg 64 This policy repeats national and local planning policies.</p> <p>It is unlikely that all new development such as infill, will provide infrastructure and it is unrealistic to expect a householder application for example, to specify whether existing community infrastructure is adequate or to be able to provide financial contributions towards new infrastructure. Therefore it is suggested that the scale of development to which the policy applies is clarified.</p>	<p>Scale of development added into policy.</p> <p>Noted, neighbourhood plan focuses on provision of community facilities, hence this policy.</p>

				<p>It appears very onerous to expect a developer to demonstrate that existing community infrastructure is inadequate as this is normally done by the Local Planning Authority through consultation with service providers. The amount of evidence required to demonstrate that the infrastructure is adequate is open to interpretation.</p>	
				<p>Policy LNPS2 pg 65 The policy is not supported by evidence which demonstrates that landscape character, visual impacts, environmental impacts, light pollution, proximity to wooded areas, traffic and access, residential amenity have been taken into account and the suitability of the sites have been thoroughly addressed.</p> <p>There is an absence of any mitigation in the policy other than reference to sustainable urban drainage and this increases the risk that the environment could be harmed. It could be argued that the proposal could contribute to urban sprawl because it extends into the open countryside beyond the built up limits of the village.</p> <p>However, it is acknowledged that this type of development is often found on the edge of a settlement because of limited capacity within the existing built up area.</p> <p>It is noted that proposed allocation LV1 appears to include a section of land that is included within the application site for residential development</p>	<p>The issues listed have been added to the rationale to the policy.</p> <p>No it is part that isn't in 17/00067.</p> <p>Will amend</p>

			<p>(17/00067/DEEM4). It is important to demonstrate that there is a good prospect the site will be delivered and there should be evidence that it is suitable, available and economically viable (see also comments re: page 63)</p> <p>Map 8 is not sufficiently clear in terms of the proposed boundaries of the two sites. It is suggested that a suitable OS base is used.</p>	
			<p>Policy LNPS3 pg 67 This policy repeats national policy</p>	<p>Agreed The purpose of the policy is to highlight the specific pitches in question.</p>
			<p>Policy LNPE2 pg 72 Suggest that the phrase 'will be considered for approval' is reworded to development will be supported or encouraged.</p> <p>It should be recognised that there are permitted development rights available which would enable changes of use of commercial buildings to residential uses, subject to criteria. The motives for seeking the retention of retail uses in Loggerheads village is understood but it will not always therefore be possible to ensure that a retail element is retained. The policy could be reworded to encourage development proposals to retain an element of retail use, where possible.</p>	<p>Noted, wording of policy reviewed but group support original wording to protect current provision.</p> <p>Permitted development rights added to the interpretation.</p>
			<p>Policy LNPE2 pg 72 The policy states that new development must (our emphasis) incorporate high speed internet connectivity. This is required to be active before development is occupied.</p> <p>It is important to consider that this policy appears</p>	<p>See SCC response which supports a stronger policy which has been adopted.</p>

				<p>to relate to all forms of new development (householder, minor developments etc.) and this is an onerous requirement. It may be also be outside of the developers control to provide this due to availability or cost.</p> <p>An alternative approach could be to request a 'connectivity' statement to be submitted with development proposals of a suitable scale to demonstrate the availability of broadband and a timetable for connection. If broadband is not available in that location at that time or in the foreseeable future, there is some flexibility built into the policy. Implementation of any 'approved statement' could then be subject to an appropriately worded planning condition.</p>	
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