

Staffordshire Moorlands Local Plan – Submission Version

Representations Form

Guidance Notes

Please ensure that you have read the guidance notes for submitting representations before completing this form.

The Local Plan and related background documents can be viewed on the District Council's website, Council offices and local libraries.

Website:

www.staffsmoorlands.gov.uk/localplan

Council offices:

- Leek** Moorlands House, Stockwell Street, Leek, Staffordshire, ST13 6HQ (8.45am - 5.15pm Monday - Thursday and 8.45am - 4.45pm on Friday)
- Cheadle** Councils Connect, 15a-17 High Street, Cheadle, Staffordshire, ST10 1AA (9.00am - 12.30pm & 1.00pm - 5.00pm on Monday, Wednesday and Friday)
- Biddulph** Town Hall, High Street, Biddulph, Staffordshire, ST8 6AR (9.00am - 5.00pm Monday – Friday)

Please return this form by **5pm on Wednesday 11th April 2018** to the email or postal address given below:

Email: forward.plans@staffsmoorlands.gov.uk

Post: Freepost RRLJ-XCTC-JBZK, Forward Plans, Staffordshire Moorlands District Council, Regeneration Services, Moorlands House, Stockwell Street, Leek, ST13 6HQ

Please note

Representations must be attributable to named individuals or organisations. They will be available for public inspection and cannot be treated as confidential.

Part A – Personal details and notifications

	Personal details	Agent's details (if applicable)
Title	Mr	
First name	Greg	
Last name	Powell	
Job title (if applicable)	Secretary (Cheadle Unite)	
Organisation (if applicable)	Cheadle Unite	
Address line 1	62 Rakeway Road	
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Notifications and Consent

- Please specify whether you wish to be notified of any of the following stages in the Local Plan process **and give consent for use of your personal data** (please tick relevant box/s)

Submission of the Local Plan for independent examination	<input checked="" type="checkbox"/>
Publication of the recommendations of the Inspector appointed to carry out an examination	<input checked="" type="checkbox"/>
Adoption of the Local Plan	<input checked="" type="checkbox"/>
Please tick the box if you consent to storage and use of your personal data in order to contact you about arrangements for the examination and the stages above (if requested).*	<input checked="" type="checkbox"/>

***IMPORTANT. We need your consent to store and use your personal data to contact you about the Local Plan ONLY. Note this information will only be used by the District Council and Planning Inspectorate and will only be used to contact you about the examination process. It will also be used by the Council to let you know about Submission of the Local Plan for independent examination, Publication of the recommendations of the Inspector appointed to carry out an examination and adoption of the Local Plan if you have asked to be notified about these stages by ticking the boxes on this representations form. If you choose not to consent, we will not be able to use your information, including your representations.**

Part B - Representations

Please use a separate Part B Form for each representation and ensure that one copy of Part A (Personal details) is attached.

1. To which part of the Local Plan does this representation relate?

	Insert paragraph, policy or map number
Paragraph	Local Plan - Cheadle
Policy	SS 7 Cheadle Area
Policies map	Appendix 3 – Cheadle Maps

2. In relation to the policy, paragraph or map that you have identified, do you consider that the Local Plan is (please tick relevant box/s) :

	Yes	No
Legally compliant	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Sound	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Complies with the Duty to co-operate	<input type="checkbox"/>	<input checked="" type="checkbox"/>

3. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

In May 2016 residents were invited (yet again) to respond to the local plan proposals for housing around Cheadle and the Staffordshire Moorlands. Cheadle Unite submitted a response to SMDC (June 2016) following feedback from the community. In September 2017 we again made a Consultation Response highlighting what we believe are excessive levels of housing for Cheadle. Our Comments below reflect that view in consideration of the Local Plan.

Summary:

In 2016 SMDC chose to ignore the official 2012 Office for National Statistics Sub-National Population Predictions projecting a much reduced and levelling off of the population across the Moorlands and also avoided accommodating the latest 2015 Department for Communities and Local Government Household prediction, which translate this reduced population into a much reduced housing requirement of only 2573 dwellings across the Moorlands, Instead choosing to stick with the original 6000+ housing requirement.

With what justification?

While not disseminating the above figures, SMDC commissioned 'additional work' produced by Nathaniel Lichfield Partners (Jan 2016). This report acts as a mechanism for SMDC to argue for retention of high levels of housing using an Oxford Economics model.

An SMDC document titled '5._local_plan_development_requirements' dated March 2016 contains the NLP report.

It draws the assertion that due to an aging population, in order to see a net gain of just 85 Jobs through to 2031 it is necessary to secure a net migration of 7,697 people into the area. (section 7.27). The document contains a graph in Figure 5.1 that highlights how the Oxford Economics model data pushes the OAN range well above the level that would exist due to ONS natural local population growth and the housing needs from the 2015 DCLG Housing level predictions.

Despite the very significant voice of the community through numerous consultations and thousands of responses, SMDC continues to pursue the same agenda. In fact Cheadle now faces an additional 150 houses taken from smaller villages.

Cheadle residents recognise our duty to provide a level of housing especially to meet local demand and for our younger generation. However we believe the level of housing proposed in the Local Plan is against the wishes of the majority of the Cheadle community.

Details:

- Karen Bradley MP and the previous housing minister Brandon Lewis MP have made it clear on local radio and in writing respectively, that it is for the local community to decide the level of housing that they require. The SMDC Leader of the council Sybil Ralphs after consultation with Executive has stated to the Community and to councillors (2nd March 2016 Council Assembly) that the Planning Inspector effectively sets the level. Sybil Ralphs claims that while SMDC can set a lower figure the Planning officer will simply reject it.

SMDC have clear evidence that consultations in 2009, 2010, 2012, 2014 a petition of over 1000 signatures to parliament and over 5500, responses in 2015 from the local community are against the excessive housing levels proposed.

SMDC have failed to detail any attempt at reducing our allocation to the community.

Suitable evidence would include:

- I. Written correspondence to the Planning Inspector, setting much lower housing provision figures and clear responses rejecting such levels (these could have been initiated anytime over the last 12 months citing data SMDC already have).
- II. Details of any delays the Planning Inspector might invoke leaving us exposed to inappropriate development (if applicable).

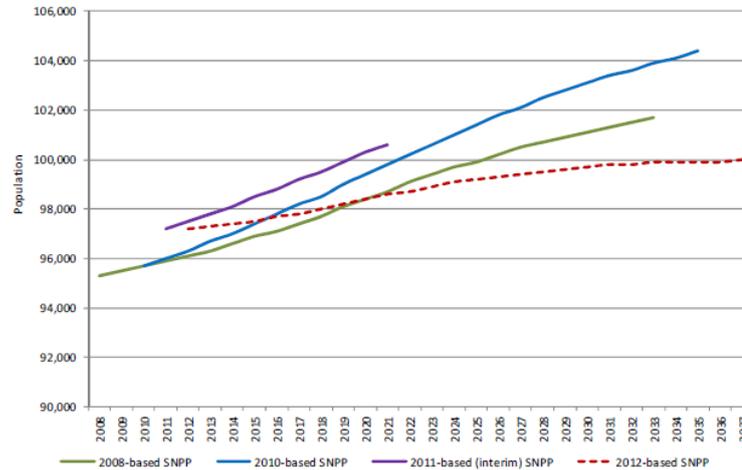
SMDC have therefore effectively decided for us that our preference is to retain high housing levels. This does not tally with all the above including 5500+ responses that SMDC received in 2015. It does not take into account genuine quality of life issues including road traffic congestion, long term sustainability, the environment, damage to agriculture and access to doctors and dentists and the wider area to name a few.

- The 2012 Office for National Statistics Sub-National Population Predictions project a much reduced levelling off of the population across the Moorlands (detailed in the graph below). These figures came out after the initial 6000+ housing targets were set. SMDC have not seized on these figures to justify a reduction in our housing provision in line with local aspiration feedback of at least 6 years. In fact SMDC failed to disseminate this ONS information at last year's consultation despite being aware of it well in advance.

2.9

Figure 2.2 presents a similar picture for Staffordshire Moorlands, albeit the 2012 starting point is considerably higher than for the 2008-based SNPP and 2010-based SNPP equivalents. However, whilst these historic projections increase by 5,200 and 7,100 respectively between 2012 and 2031, Table 2.2 indicates that the latest 2012-based SNPP increase by only 2,600 over that time period.

Figure 2.2 Comparison ONS 2008/2010/2011/2012 based SNPPs for Staffordshire Moorlands District



Source: NLP Analysis / ONS 2008/2010/2011/2012-based sub-national population projections

Figure 2.2 above shows in dotted red how the 2012 population is naturally levelling off compared to the previous 2010 figures in blue.

- Further, the Latest 2015 Department for Communities and Local Government Household predictions translate the above population levelling off into a much reduced housing requirement of only 2573 dwellings across the Moorlands, this is far lower than the 6000+ figure. This information was also available months before the summer 2015 consultation took place. But SMDC again chose not to take any account of it or disseminate these lower figures to residents in the July 2015 'Site Consultation Booklet' as part of a balanced debate. What should have been a very significant aspect in informing the community on housing level was, in this 129 page document, reduced to the following statement:

However, the CLG 2012 - based household projections were published on 27 February 2015 and replaced the previous projections. As a result the Council has commissioned some additional work which will assess the impact of these projections on the objectively assessed needs for the district.

- The ‘additional work’ that SMDC have (under Government direction) commissioned was produced by Nathaniel Lichfield Partners (Jan 2016). SMDC effectively justifies retention of high levels of housing using an Oxford Economics model. An SMDC document titled ‘5.local_plan_development_requirements’ dated March 2016 contains the NLP report (as usual, poorly titled and lengthy in content and words to ‘spin’ an angle).

It draws the assertion that due to an aging population, to see a net gain of just 85 Jobs through to 2031 it is necessary to secure a net migration of 7,697 people into the area. (section 7.27)

The document contains a graph in Figure 5.1 (below) that highlights in brown how the Oxford Economics model pushes the OAN range well above the level that would exist due to ONS natural local population growth and the housing needs from the 2015 DCLG Housing level predictions (As shown by the red arrow).

Figure 5.1 Summary of Scenarios for Staffordshire Moorlands (dpa)



Source: NLP Analysis

The March 2016 SMDC document has never been disseminated to residents or action groups for comments, it has never been debated within the Moorlands local community. It has only been produced as an evidence base to serve the strategy of SMDC executive and some members of the Council to justify retention of high housing figures. As on previous occasions, key information was available to SMDC and yet they did not engage with the local community and disseminate it, although it was on this occasion, the working assumptions for retaining such high levels of housing provision during the May/June 2016 consultation. Residents of Cheadle attended the short 3 hour workshop on the 17th May 2016. SMDC did not share the above information.

When Challenged and presented with the views of both Karen Bradley and the housing minister Brandon Lewis, regarding locals having their say and the Oxford Economics Model, staff responded by indicating they had to abide by over-riding National Policy, effectively making a mockery of any local opinion.

1) Failure to co-operate and promote an effective strategy for the region

- Cheadle Unite have for over 7 years been asking SMDC to work closely with our Local City 'Stoke-on-Trent' on regeneration of Brownfield sites where infrastructure has been proven to exist (road, rail, drainage etc) and where affordable housing can be built for our younger generation. Uncertainty of development is one of the greatest barriers that work against regeneration and development in the Potteries. SMDC can play a key role in making sure regeneration happens for the benefit of our City and the wider region, where we all prosper by collaborating and setting an overall housing figure with S-o-T and the Potteries that reduces our allocation in win-win collaboration. S-o-T have already acknowledged in writing that development opportunities outside the regeneration areas draws developers away (and creates uncertainty that discourages occupancy). Cheadle Residents have made it clear we want our allocation reduced. Provision for this can clearly exist under a duty to co-operate (this is fleetingly referenced in 7.41 of the 2/3/16 SMDC document). However SMDC continued last year to evade grasping this issue as is stated in section 7.43:

Stoke-on-Trent City Council is in the early stages of preparing a joint Local Plan with Newcastle-under-Lyme Borough Council. At this stage, the evidence to support the plan, including the capacity to meet housing needs has yet to be established.

In responding to our request to work with the Potteries and given that Emma Bridgewater (President of the Campaign to Protect Rural England) has strong ties with Stoke-on-Trent and the Potteries and is driving an initiative to regenerate brown-field sites around the potteries and protect rural England (Nov 2016), residents are looking forward to details of progress made in working collaboratively with the City of Stoke-on-Trent and Emma Bridgewater's Initiative. **We have seen nothing to reflect co-operation to date.**

2) Ignoring reality and promoting a declining standard of living

- **Housing Proposals for Cheadle.**

Looking at the potential number of housing being currently considered for Cheadle, we have the following Figures.

	Passed	Potential
Thorley Drive	60	197
Wells St App run out	20	
Hurst Yard (Bank Street)	38	
Royal Oak (Flats)	10	
Birches (Back of High School)		45
Brookhouses	33	
Council Offices	10	
Turners Pasture (Bungalows off Ness Grove)	36	
Ayr road & Cheltenham Road (Off Ness Grove with school)		325
JCB Queen Street (Cecilly Brook)	121	
Small developments (The Green etc, Mobberley)	10	
Tean Road/ Forsbrook Road (Nr Brookhouses)		430
Plus 2017 consultation (Stokesy, Brookhouse road, etc)		260
Total	338	1257
Cheadle Total (Passed + Potential)		1595
Plus impact from Teanford + land adjacent to the Anchor Pub		116
Grand Total In and around Cheadle		1711

This level of housing cannot be accommodated in Cheadle without severely impacting on the infrastructure including road congestion and consequential declining health through air pollution.

- **Public Health**

Cheadle Unite have as far back as January 2010 highlighted to SMDC that 'the extensive green-field agricultural site development remote from the potteries where Brownfield sites and traffic infrastructure exist is not acceptable and SMDC were and are not, compliant with the National UK low Carbon transition plan and European commitments and strategy to reducing environmental impact and carbon emissions within the period to 2026'. Further health implications have been raised in our consultation response.

In 2013 we highlighted health concerns with the Planning Inspector.

In 2014 Cheadle Unite Wrote to SMDC highlighting the increased toxic fumes from vehicles and catalytic converters (especially in the first 15 minutes of use as residents leave Cheadle), posed a significant health risk to residents and our children as they walk to school. Along with increased stress and increased traffic congestion.

In 2015 Cheadle Unite highlighted how increased development would increase the traffic at the county primary school. Health and Safety Concerns with Diesel Fumes emissions in a gridlocked town were also raised.

On the 22nd of March 2017 the Guardian highlighted that UK air pollution causes 50,000 early deaths per year.

The 6 month investigation by the environment audit committee details that minute sooty particles emitted largely from the burning of diesel and other fuels and inhaled deeply into the lungs shortens lives by 7-8 months. In pollution hot spots it could be cutting lives short by as much as 9 years.

<https://www.theguardian.com/environment/2010/mar/22/air-pollution-deaths>

On 30th October 2017 the BBC highlighted a record surge in CO2 (50% higher than the average over the last 10 years).

We are now seeing CO2 Levels not seen for 800,000 years.

<http://www.bbc.co.uk/news/science-environment-41778089>

In August 2017 We raised many of the points detailed here in our consultation response

As of Nov 2017 SMDC have presented no mitigating evidence to residents that it is working to reduce it's CO2 that currently sits at the highest band (in the National atmospheric Emissions Inventory). Examples would include a strategic partnership with Stoke-on-trent City council focusing on re-use of Brownfield sites where proven road infrastructure and community transport (bus routes, rail) and local employment already exist.

Further SMDC are pro-actively promoting a development strategy against the majority wishes of the local community and in the full knowledge that the Limited 'B' road infrastructure around Cheadle is going to lead to extreme congestion and increased toxic gas emissions and health hazards to residents and local school children.

- **Road Issues**

Cheadle has serious road network issues that residents have raised as a very real barrier to further expansion of the town. Road traffic surveys have already found that roads are already running 'at capacity'. Sybil Ralphs has clearly stated 'not another brick' until our roads are improved. All SMDC have done is suggest a South West Bypass, but the reality is that no road improvements are mandatory before 'another brick' gets laid. We understand SMDC did look at a North West Link road to divert traffic, but the costs were prohibitive. Surely if no adequate road improvements can be made, development must go where existing infrastructure already exists (e.g. see above).

- **Sustainability**

The housing level provision now draws on the assertion **to see a net gain of just 85 Jobs through to 2031 it is necessary to secure a net migration of 7,697 people into the area.** This is clearly not a sustainable model.

In 2031 the population base will have increased by 7,697 people, who at some point, will form an aging population. What for 2031 – 2046 a net migration of 10,000? A sustainable approach accounts for increased assisted living, a longer working life and doesn't rely on drawing migrants from areas that would ultimately lose out on providing for their communities aging needs. Further, it is not currently possible to control who those migrants are, for example, if they are of working age. None of these factors are accounted for in the model as presented. It is clearly unsustainable and not a sound basis for sustainable planning.

3) Ethics and Conduct

Residents are frequently expressing concerns about the ethics and accountability of Executive at SMDC and a number of key councillors.

- I. The local press have clearly picked up on inappropriate activities surrounding the “damning “ report on a breach of conduct by Chairman of the SMDC planning Committee Mike Worthington and the Endon Riding school application, where after having voted to approve a planning application he stated ‘I hated doing that, but I was under instructions’. (Leek Post & Times 2nd March 2016)
- II. Revelations regarding another planning application just prior to an election where ‘We did scratch around to find a reason to refuse it’ (Leek Post & Times 27th Jan 2016).
- III. There are ongoing concerns regarding a planning application off Thorley Drive, proposed by a councillor who previously had declared an interest on the very same land.
- IV. Residents are highly concerned that SMDC clearly state that they do not require the New homes bonus in order to balance the budget, but who then (as part of Justification for high housing allocation) state as a consequence of any further delay:

‘Potential loss of the New Homes Bonus (currently worth £1M and Supports front line services)’. It is Cheadle Unite’s understanding is that it is in fact illegal to push for and approve planning applications on the basis of a financial gain.
- V. Residents are concerned that there are no restrictions on where, or on who the 6 years matched council tax funding (I.e. paid every year for 6 years) is spent (tax payer funded via the Government). They are, however, concerned at the excessive salaries paid out to senior executive at SMDC e.g. The Chief Exec of SMDC was paid £169,869 + £26,191 into his pension by tax payers in 2014.

- VI. The new homes bonus is our tax payer's money working against us. This arrangement is failing society, especially in our area given the above. The Campaign to protect rural England (CPRE) have a number of articles like 'Set up to fail' on www.cpre.org.uk that explain why.

Key facts as we see them:

1. The 'Oxford economic' model used clearly raises the justified level of housing provision for the Moorlands, but it is seriously flawed in failing to identify how it will ensure that the new houses will in fact be occupied by a working age population. We estimate that far from solving any contentious working population imbalance, it has a far greater potential to exacerbate the problem and increase demand on already over-stretched resources. It fails to identify any potential we already have to address any working population imbalance through, for example, the increase in the retirement age and increases in the age of our working younger generation before they leave home.
2. **There have been many housing developments in Cheadle Over the last 30 Years. None have delivered any significant infrastructure improvements, be it improved roads, schools doctors etc. All have, in effect, increased demand on our limited resources. There is absolutely no evidence that this will change when more houses are built especially in the current and likely future economic climate.**
3. **There are genuine public health concerns over increased housing provision in a town that has very limited road infrastructure with only 2 A roads (A521 and A522). Slow moving and stationary traffic will increase toxic fume intake for our families and children walking to school.**
4. Questions exist over money set aside for planning obligations (106 agreements) made between Developers and SMDC. Where is this money being spent?
5. The housing land supply schedule shows that despite 378 proposed developments for Cheadle dating back to 1998, only half have been completed (190)
6. There is growing evidence that SMDC is not effective in enforcing the highest standards when granting planning permission, be it ineffective drains, inappropriate or missing curbs and pavements or effective on-site safety checks during site construction. [2]

7. Cheadle Unite have repeatedly and for nearly a decade asked SMDC to work with our local City Stoke-on-Trent, to ensure development focus and regeneration takes precedent on Brownfield sites around the potteries, where affordable housing can be built around existing infrastructure and proven transport links. Not least, to protect rural England and our agricultural land. Our valued city has great potential to create wealth for the region, as does Cheadle to provide tourism for its beauty and local resources. SMDC continue to avoid working with Stoke-on-Trent, while East Cheshire takes a different view and collaborates.
8. SMDC's proposals equate to an annual house build of 300 houses per year, against a history of 80 houses per year. We don't believe this is reasonable and is likely to produce huge challenges for our infrastructure.
9. SMDC's Housing Strategy hopes to secure a 'New Homes Bonus' whereby Council Tax income from new houses is equally matched from central government funding for 6 years. There are no restrictions on how, or where, this money is spent.
10. The Chief Exec of SMDC was paid £169,869 + £26,191 into his pension by tax payers in 2014.

Conclusions

SMDC are continuing to propose inflated housing targets based on an Oxford Economics model that requires a net migration of by 7,697 people into the Moorlands to produce a net increase of 85 Jobs to 2031. The model is seriously flawed and is purely financially motivated. It does not reflect the wider area, need for affordable housing regeneration in our City, local aspirations, quality of life and a more measured deliverable figure for the Moorlands. One that accounts for road infrastructure limits, protection of our environment and agricultural land. It attacks our community by stealth, fails to discuss true targets and is an undermining of democracy and the aspirations of our local community. Further, there is still no evidence that SMDC are working collaboratively with Stoke-on-Trent City Council on regeneration of the Potteries and instead every indication is that efforts are directed at attracting developers around the Moorlands for financial gain, against the wishes of the vast majority of Cheadle and the Moorlands community. **Cheadle Unite Call again for collaboration with the Potteries, reduction of our housing numbers, protection of our open and green sites, focus on regeneration sites (especially around the Potteries) and to recognise the infrastructural limitations that we have as a community and to protect our health.**

(Continue on a separate sheet / expand box if necessary)

4. Please set out what modification(s) you consider necessary to make the Local Plan legally compliant or sound, having regard to the test you have identified in the question above where this relates to soundness. You will need to say why this modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Reduce the Level of Housing Proposed for the Moorlands and Cheadle, In line with the 2012 Office for National Statistics Sub-National Population Predictions which project a much reduced levelling off of the population and the subsequent 2015 Department for Communities and Local Government Household predictions which translate into a much reduced housing requirement of only 2573 dwellings across the Staffordshire Moorlands with a proportionate decrease for Cheadle. A move that is far more in line with the aspirations of the community. Also SMDC to work far more collaboratively with our local City of Stoke-on-Trent on regeneration of many of the brown-field sites around the Potteries where proven infrastructure exists and where rural green fields around the Moorlands can be protected for future generations.

(Continue on a separate sheet / expand box if necessary)

The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

7. Signature:

A rectangular box containing a handwritten signature in black ink. The signature appears to be 'Creybourn' followed by a period.

8. Date:

A rectangular box containing the date '11 April 2018' written in black text.