

Background

Cheadle Unite submitted comments on the 'Main Modifications to the Staffordshire Moorlands Local Plan Submission Version 2018' (Detailed in EL10.001) to the Planning Inspector (29th October 2019). We made a written request that the inspector be given the full text (concerns have been raised by other action groups that the inspector is only presented with a summary). The 3 recommendations we made were:

To Make the Local Plan sound we stated in October 2019:

i) The planned level of housing should be significantly reduced (i.e. by over 50%). This reduction can be done on a proportional (pro-rata) basis without any further impact on the local plan.

ii) Any assessment of housing build against unrealistic targets should be removed. Unrealistic targets would be figures that don't tally with consistent national metrics (Office for National Statistics (ONS) figures), the local community and a sustainable environmental strategy.

iii) Genuine collaboration with Stoke on-Trent and the Potteries to work on a long term sustainable strategy for the reasons stated.

Comments here relate to questions raised by the inspection Session 2 on the HIS and housing trajectory and relates to Point ii made by Cheadle Unite above. The points made in this document are a condensed summary by Cheadle Unite and we again request that they are presented in full to the planning inspector and not summarised.

Outline

There is a massive disparity between the plan of 6080 dwellings to 2034 that are being planned based on a flawed 'Oxford economics model' and a more balanced perspective using a wider set of metrics that includes genuine ONS Population predictions, Department for Communities and Local Government (DCLG) housing predictions, environmental, health, sustainability and local aspirations (as detailed in our 29th October 2019 submission). The only way to address this disparity on such high figures is to extend the timeline or 'trajectory' of house build. Assessment using the Liverpool Method over the full 15 year plan period rather than over 5 years goes some way to address the discrepancy though in reality still allows for an end target build that sits well above genuine objectively assessed need using a balanced perspective.

Detail

Local Perspective and a balanced assessment

The DCLG housing requirements clearly do not convey a need for housing level of anything like 6080 dwellings to 2034. As far back as 2015 the DCLG figure was only 2573 dwellings a figure that looks to have dropped to a genuine requirement of only 650 dwellings if we look at the 2016 ONS population figures. The disparity is striking.

The excessive plan sits against the aspirations of residents which has been further illustrated with the new consultation on major modifications including sites in Biddulph (BDNew etc) and Cheddleton to name a few which adds to the many thousands of consultation responses already submitted across the Moorlands including Cheadle (which still stand) and contradicts a sustainable environmental policy which sets to increase Pollution and promotes declining health and long commuter journeys. A wide range of factors are likely to impact on supply and demand. Not least the local, national and global economy and other factors such as Brexit. A plan based purely on a fiscal policy carries significant risks if, for whatever reasons, it's aspirations may not be met and it is the principle king pin of the plan. Both apply with the local plan with an overriding 'Oxford Economics' Model. Amongst the 2839 pages of representations submitted to the planning inspector 'EL11.003 Individual responses', there are a handful of responses from developers. Their comments as individual corporate entities should carry no greater weight than any

other of the many thousands of representations that have been conveyed to both the District Council and the Planning Inspectorate over the last decade regarding the local plan. More so it is not the Developers (largely outside the district) that will have to live with the consequences of their developments (only their profits). It is the local community residents, environment and health and sustainability of future generations that will live with the impact. Surely our communities should have priority say over the profit motivated corporate targets of developers?

Looking at the Numbers

Despite the excessive targets for the Staffordshire Moorlands. SMDC have identified 5668 dwellings to the Year 2034 in the HIS (EL10.004), close to the highly leveraged target of 6080 and project a surplus of 192 houses by 2031/32 (12 Years from now) on their table page 11.

6080 dwellings sit massively above the ONS and DCLG required predictions that even on the 2015 DCLG Housing Projections (and 2012 ONS Sub National Population based figures) detailed only 2,573 dwellings. If we factor in the latest 2016 Figures the requirement is even lower by our calculation, a net population increase of 1491 to 2031 (and 1532 to 2036), would only require around 650 Dwellings based on the UK average of 2.4 occupants per household. It is more than reasonable to argue that monitoring against such inflated figures is not appropriate

Taking our home town of Cheadle Looking at the revised HIS July 2019 (10.004) Table Page 11

	HIS >	EL10.004
		2019 Jul
Allocations:	Cheadle North	320
	Cheadle: Cecilly Brook	106
	Cheadle: Froghall Rd	45
	Cheadle rear of Birches	51
	Cheadle Stoddards	32
	Cheadle The green	42
	Cheadle Mobberley	430
	Small Site Allowance 11x10	110
FPP:	Cheadle: Thorley Drive	60
OPP:	Tenford Lane	40
	Total	1236
	SMDC Sites Under Construction	294

EL10.004 Details 1236 dwellings alone for Cheadle (detailed above), the latest ONS figures across the Moorlands predict a genuine need of around 650 dwellings. With an allocation of 25% (excluding the inclusion of Blythe Vale which would lower the percentage) it is reasonable for Cheadle Residents to suggest the figure should be under 200 dwellings rather than 1,246. The same assessment can be applied to Leek, Biddulph and all the local villages hamlets and rural locations.

The allocation of sites by SMDC that can meet 5668 dwellings to the year 2034 in the HIS (EL10.004) is, in our opinion, excessive and certainly should not be used as a trajectory target, but clearly demonstrates adequate provision over the plan period. Any review should be based on a Liverpool method (over the plan period of 15 years) rather than 5 as it is clear from the HIS that provision has been made for even these high 'Aspiration' figures.

Why it Matters - Consequences

From the above table Cheadle has provision for over 200 dwellings on Brownfield sites that can meet a more balanced proportionate ONS required level. With a much more relaxed build rate there may be further Brownfield sites that come forward over the plan period for future requirement (2034+ period). We feel the constant threat of additional site allocations encourages the Council to have to pass applications that may not be appropriate for the local community and they may in effect have to accept applications that are less than ideal given a threat that they have to release more land. This includes inappropriate access to Greenfields and spaces over regeneration sites. The following details the situation regarding Greenfields as conveyed by the Campaign to Protect Rural England as far back as 2015:



CPRE fights for a better future for England's unique, essential and precious countryside. From giving parish councils expert advice on planning issues to influencing national and European policies, we work to protect and enhance the countryside.

Our objectives

We campaign for a sustainable future for the English countryside, a vital but undervalued environmental, economic and social asset to the nation. We highlight threats and promote positive solutions. Our in-depth research supports active campaigning, and we seek to influence public opinion and decision-makers at every level.

Our values

- We believe that a beautiful, tranquil, diverse and productive countryside is fundamental to people's quality of life, wherever they live
- We believe the countryside should be valued for its own sake
- We believe the planning system should protect and enhance the countryside in the public interest



This report has been informed by independent research undertaken by Housing Vision and Tibbalds entitled *Smarter SHMAs: a review of Objectively Assessed Need in England* which can be accessed at: www.cpre.org.uk

The consequences of the council having to meet unrealistic targets include having to make significant compromises on a number of issues. Apart from the shortfalls of the 'Oxford model' already highlighted, where the demographic of new occupants cannot be determined to secure more jobs (most likely elderly), a target system that encourages unaffordable, non appropriate housing stores up serious long term problems for the community. Care in the community and social care are surely the second greatest challenge behind the environment. Further it draws developers away from more sustainable regeneration of Brownfield sites (locally and regionally) and encourages unnecessary Greenfield development. Developers committed to working within the local plan can argue further site allocations, undermine their viability and further leverage their position (to drop 106 commitments etc).

Prioritising a 'trajectory' review process against a plan that is so far out of kilter with ONS figures and relies solely on a fiscal model is likely to be seen by many as reckless. Developers repeatedly quote the government position and the Localism Act 2011 in pressing for approval of applications unless there are substantive reasons for objection. Substantive is a subjective term that makes it very difficult for a financially and resource strapped council to protect the interests of the local community, and extends to similar shortfalls in the finances of a resource strapped Highways Agency.

Our town Council in the last 9 months has seen a number of applications from developers to :

- Remove commitments to 106 funding intended to support our infrastructure (schools, playing fields etc)
- Abolish or reduce any affordability (setting a precedent)
- Argue that houses that do not meet National Defined Space Standards (NDSS) on 3rd and 4th bedrooms (intended to ensure a healthy living environment) are in fact 2 and 3 bedroom houses with a study.
- Are proposing significant development of dwellings that do not meet M4 Class 2 accessibility for '*older people and individuals with reduced mobility*'
- Develop on isolate sites that may normally be considered unsustainable (bus links, highways issues etc)

Additional land provision does not rectify the above, it simply allows developers to hold further 'Option agreements' on any new sites and further leverage the council on compromise. We feel our council must be empowered to stop further unreasonable concessions and ensure development best suits our future needs. For example, there is a growing need to assess and re-purpose parts of our high streets, an increase in town living accommodation (above retail units for example) could play a key part in that if developers feel they want to make further contribution to our housing provision.

Cheadle and the Moorlands have never been able to develop at the implied rates and therefore should recognise that the housing provision be assessed over the lifetime of the plan as per the Liverpool method (Link below).

<https://andrewlainton.wordpress.com/2017/02/21/javid-favours-liverpool-approach-in-planning-appeal/>

To make the plan sound:

1. Remove any Target assessment against an unrealistic 6080 dwelling target for all Staffordshire Moorlands
2. Translate that into a pro-rata target/trajectory reduction for Cheadle, Biddulph, Leek and all villages and other rural area.
3. Recognise that SMDCs local plan 'aspiration' housing build should sit over the full plan period (Liverpool Method).
4. Focus on delivering the right type and mix of houses as a priority over build rate.
5. Recognise that developers currently have a large element of control over build rate (land banking etc) and increasingly inappropriate mechanism to influence planning policy and that communities and District Council need to be empowered to make sure the right types of homes are built over developer profits and this needs reporting back to and addressing at national level.

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