

1) Public consultation & taking account of local aspirations

- Karen Bradley MP and the 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:

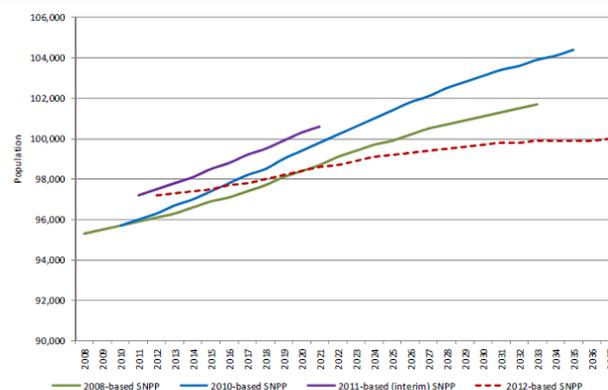
- I. **Written correspondence to the Planning Inspector, setting much lower housing provision figures and clear responses rejecting such levels (these could have been initiated anytime over the last 12 months sighting data SMDC already have).**
- II. **Details of any delays the Planning Inspector might 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 in to 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 Projections 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.

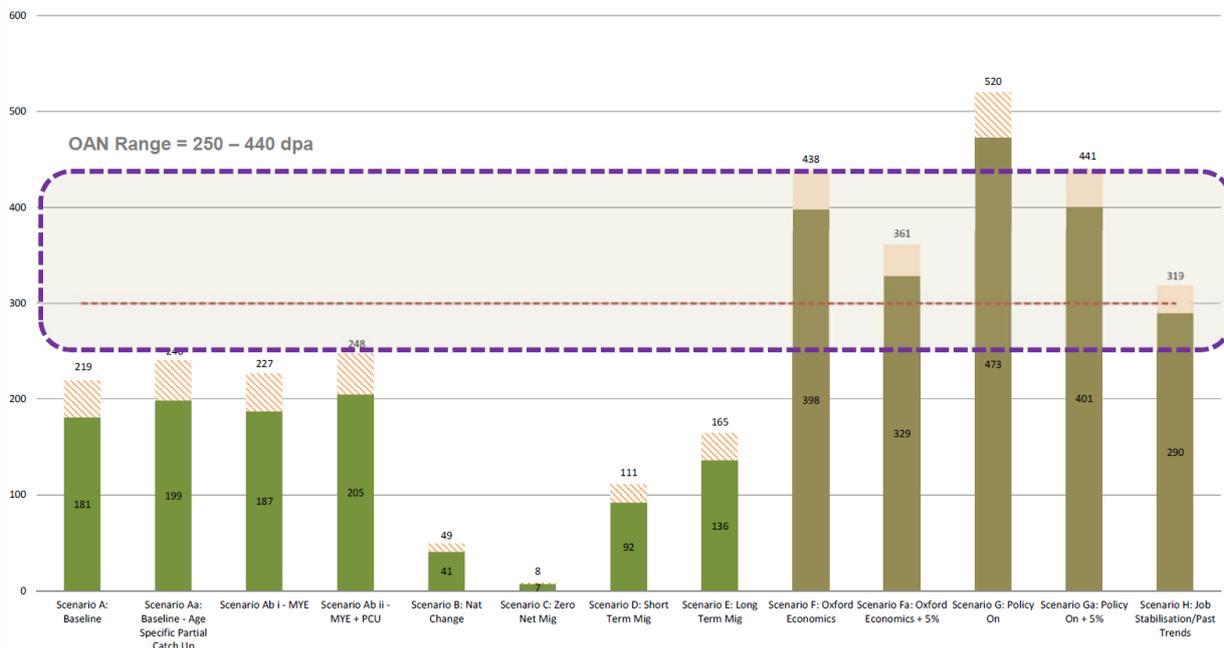
- Further, the Latest 2015 Department for Communities and Local Government Household predictions translate the above population levelling off into a much reduced housing requirement of only **2573 dwellings across the Moorlands**, this is far lower than the 6000+ figure. This information was also available 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.

Figure 5.1 Summary of Scenarios for Staffordshire Moorlands (dpa)



Source: NLP Analysis

This 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, 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.

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

- Cheadle Unite have for over 6 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 2nd March SMDC document).

However SMDC continues 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.

3) Ignoring reality and promoting a declining standard of living

• 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, longer working life and doesn't rely on drawing migrants from areas that would ultimately lose out on providing for their 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.

4) Withholding the full picture

- The preferred site options detailed on maps during the may/June 2016 consultation do not reflect the level of development proposed through to 2031. Of the claimed remaining requirement of 1029 dwellings, nearly half are not as yet identified, including 445 described as small urban extensions. Given CH001 represents 240 dwellings, these clearly cannot be accommodates within the town boundary marked on the map. Further housing proposals have already been considered and approved for sizable developments e.g. Thorley Drive - 60 properties that are not considered as part of the preferred housing allocation.

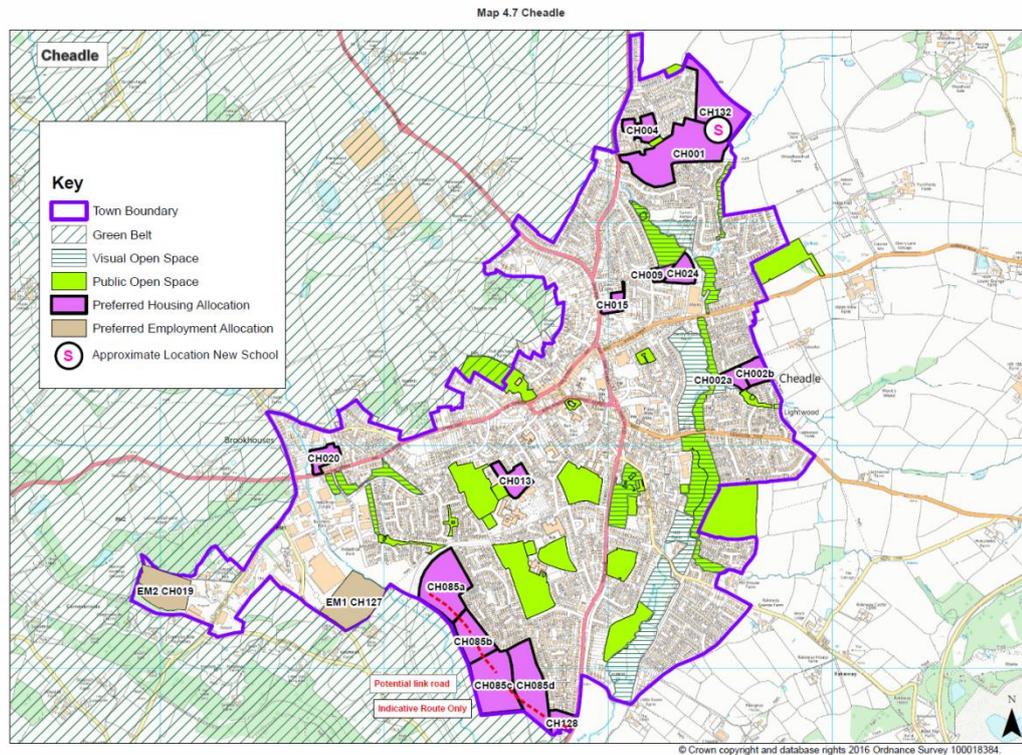


Table 4.11 Cheadle residual housing requirements

Housing provision	Dwellings
Total requirement	1029
A) New allocations - within the urban area	298
Core Strategy Broad Area 1 - CH001	240
B) New allocations - urban extensions	445
Small sites allowance	150
TOTAL POTENTIAL PROVISION	1133
Slippage allowance	-103
TOTAL ACTUAL PROVISION	1030

SMDC are clearly not presenting the local community with a clear picture of the full likely impact on the town and landscape of Cheadle over the planning period. This is development by stealth, as is borne out by recent attempts to pass plans using delegated powers (a process where minor developments such as loft conversions and extensions are considered and approved) without the involvement of our elected Planning Applications Committee. Not appropriate for a planning application of 60 dwellings off Thorley Drive or 29 dwellings in Biddulph.

5) 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 now fresh concerns regarding a recent 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 who the 6 years matched council tax funding is spent (tax payer funded via the Government). As they are 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.

Summary

SMDC are currently proposing inflated housing targets based on an Oxford Economics model that requires a net migration of 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 around the Potteries, local aspirations including tourism and quality of life. It does not recognise a more measured deliverable figure for the Moorlands that accounts for road infrastructure limits, protects of our environment and agricultural land. The Strategy attacks our community by stealth, fails to discuss true targets and undermines democracy and the opinions of our local community.

Cheadle Unite.

Part of the Moorlands United Planning Action Group (MUPAG)

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