

Cheadle Unite

Response to the Planning Inspectors post hearing advice EL6.004 and comments relating to the Housing Implementation Strategy and supporting documents (EL7.001 – EL7.009).

Committee absence and illness has restricted our response in such a tight 3-week timeframe and it has not been possible to reach out to various members of the committee and local residents with a full response.

Regarding The HIS EL7.001

Section 3 Objectively Assessed Needs

Cheadle Unite made a representation to the Planning Inspector In October 2018 (Inspection Documents EL2.030 and Appendices EL2.030A- EL2.030F) which included a case for overall provisions of Housing for Cheadle (and the Moorlands) to be reduced significantly. Highlighting SMDC have used a flawed 'Oxford economics' model from Lichfield Consultants, which heavily influences the overall provision and have failed to account for wider constraints such as road infrastructure and local opinion.

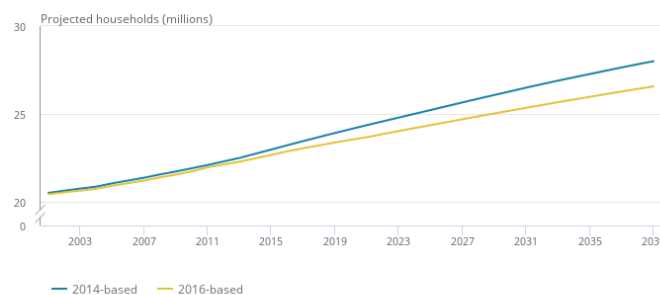
We believe the Lichfields report should only have been considered alongside a number of wider factors.

By example, the model clearly argues for a significant housing uplift for 7,697 new migrants to secure a marginal increase of only 85 Jobs over the planning period. An unsustainable policy. With no control over the age demographic of new occupants, likely to be elderly, the strategy would in fact exacerbate the claimed argument for the higher housing provision. Increasing the working population is dependant on work prospects and suitable infrastructure, not least roads, which are clear challenges for Cheadle.

The above work was commissioned after the 2012 ONS population Figures and the subsequent 2015 DCLG Housing Projections suggested a significant leveling off of the Housing Projection needs. Residents see this as nothing more than an attempt to justify an entrenched position.

The latest 2016 UK housing projections (published Sept 2018, graph below) show a further significant fall off in housing requirement.

Figure 1: Projected number of households, 2016-based and 2014-based projections
England, 2001 to 2039



Source: Office for National Statistics

A further revised version by Lichfields appears to argue for a further heavily weighted uplift due to 'Demographic led needs for affordable housing' locally to yet again retain high levels of housing provision.

The so claimed 'Short Technical Note' of 13 Pages, prepared on a short timescale and with no public accountability (suitable get-outs are also included in the document) referred to in the planning inspection and subsequently added to the evidence base (Planning Inspection Document EL5.001), is complex and we suspect out of scope for general

understanding. We are unclear on the Inspectors proficiency in interpreting this data, but would draw on the Secretary of State for housing and C&LG Sajid Javid MP who has on record stated in Sept 2017 that:

' The system simply isn't good enough, (Housing) assessments commissioned by individual authorities according to their own requirements carried out by expensive consultants using their own methodologies. The Result is an opaque mish-mash of different figures that are consistent only in their complexity. This piecemeal approach simply does not give an accurate picture of housing need across the country. Nor does it impress Local People who see their area taking on a huge number of new homes while a town on the other side of a local authority boundary barely expands at all'

Further at the Planning Inspection Cheadle Unite requested that the Lichfield Report be removed from the evidence base due to the adverse uplift created by the 'Oxford model'. The Inspector may recall that It is on record at the Planning Inspection that the Lichfield representative indicated that if the report was removed that SMDC will have no evidence base. SMDC made no comments on this statement regarding the objectively assessed needs for Housing.

Cheadle Unite subsequently clarified at the hearing a range of options that SMDC had at their disposal to make a more balanced and informed judgement:

- Local opinion as expressed in the vast majority of 16,000 representations to SMDC over 3 rounds of consultation (As detailed in the sizeable community response data held by SMDC), including petitions.
- Health issues including air pollution levels and a need to work on Emission reductions under UK and EU directives in line with basic Human Rights (detailed further below).
- Infrastructure constraints
- Environmental issues including loss of agricultural land, wildlife and green spaces including the habitats directive
- Economic realities
- Long term sustainability (not least in a post fossil fuel economy)
- Effective co-operation with our over-lapping City Councils as part of an effective Wider Strategy informed by National Policy.
- Draw a more rational interpretation of the raw 2012,2014 ONS population predictions
- Draw a more rational interpretation of the raw 2014,2016 DCLG Housing Projections

Commissioning so called 'experts' to produce reports or models to re-enforce a perspective does not make that perspective sound. The 'Black-Scholes' equation used by so called 'financial experts' as a method for assessing the value of an ongoing contract along with the 'Gaussian Copula Function' modeling of Complex risk, have clearly caused great financial damage in 2008, not least with a connection to sub-prime housing loans. Decisions that brought great hardship to many and implimented by a disconnected few.

The level of housing provision proposed by SMDC is excessive, with Cheadle looking at a significant swell of over 20% of the population over around 15 years. Cheadle Unite have seen no evidence that the voice of those likely to be affected has had any impact to reduce the numbers as a balanced approach, despite reasoned arguments and the fact that we are the thousands that will suffer, as the infrastructre buckles, air pollution rises and quality of life is reduced.

The HIS document Sections 3 clearly reflects the continued use of the Lichfields Report in terms of a 10% uplift for affordable housing, plus a 10% unsubstantiated lift for 'Market Signals'. It also talks of enabling a higher level of inward migration from neighbouring areas. Cheadle Unite presented a case to the Inspector that SMDC had not worked effectively on a 'Duty to co-operate', with FOI requests detailing no significant co-operation over nearly a decade up to submission of the Local Plan between SMDC and Stoke City and the Potteries. This draw of inward migration will not help address the much needed regeneration of Stoke-on-Trent and the Potteries with their available sites for genuinely affordable housing, where there is proven infrastructure (existing road, rail Buses etc.).The SMDC plan for the proposed level of housing fails to identify the true costs needed in making adequate

infrastructure improvements to roads, doctors and hospital provision (to name a few) and address an increasing commuter base and the impacts to health and the environment. The objectively assessed needs do not appropriately factor in Traffic congestion, health and environmental issues.

Cheadle Traffic Congestion

At the Planning Inspection hearings regarding Cheadle, during discussions on Infrastructure and Traffic issues a representative of Staffordshire County Council referenced a Transport document. The Staffordshire Moorlands District Integrated Transport Strategy (Oct 2018) has subsequently been added to the Planning Inspection documentation (EL5.003).

The document states that the *'network generally operates within capacity'* reflected by the Officer from Stafford County, however what was not made clear was that Section 2.12 and 2.13 clearly states:

' during the PM peak hour there is currently queuing traffic southbound along the A522 Leek Road and Tape Street and westbound along Queen Street. The proposed development sites in Cheadle will exacerbate this problem, with queuing in future years likely along these corridors in both the AM and PM peak hours, with additional queuing northbound on Tape street at the junction with Ashbourne Road.

Use of an 'averaging' process to infer 'general operation within capacity' is a seriously flawed approach (not least for Nitrous Dioxide emissions detailed below, when increased congestion occurs where our children walk to and from school). By inference the comment clearly infers there may be areas that are not within capacity. The reality is that the road traffic survey clearly will be impacted by developments in and around Cheadle. The Transport Study Report 2015 (COSTCDT6573/Rep 003 FINAL) held by SMDC contains a number of illustrations. Including the one detailed below:

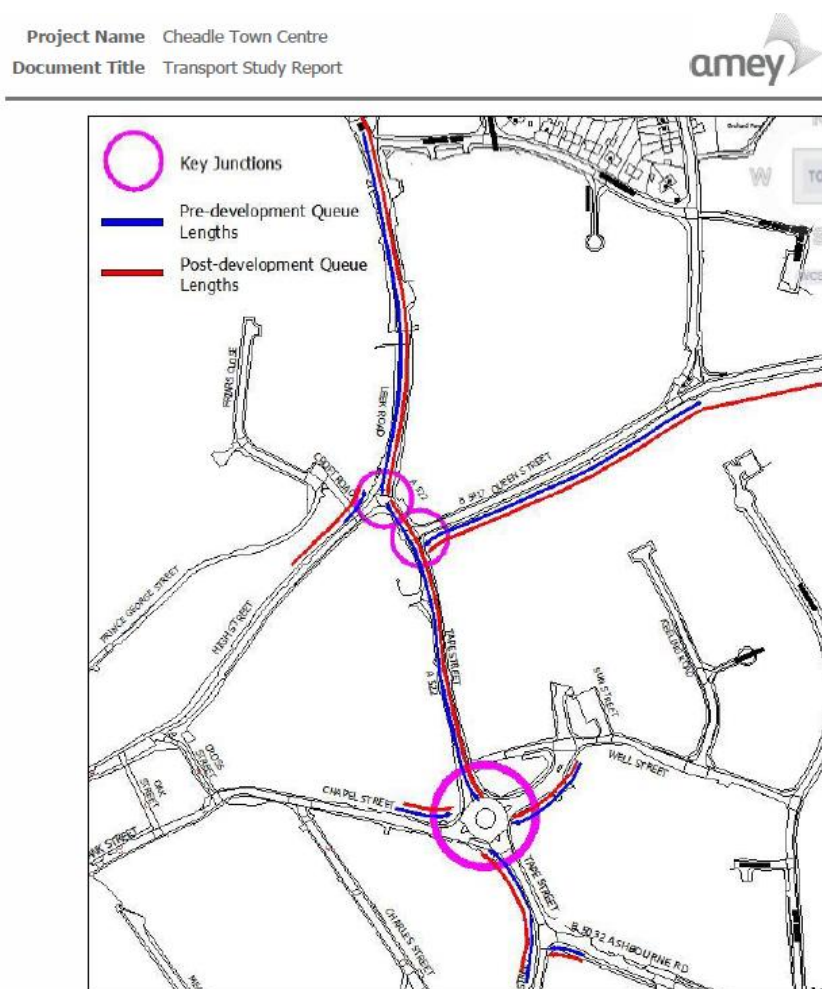
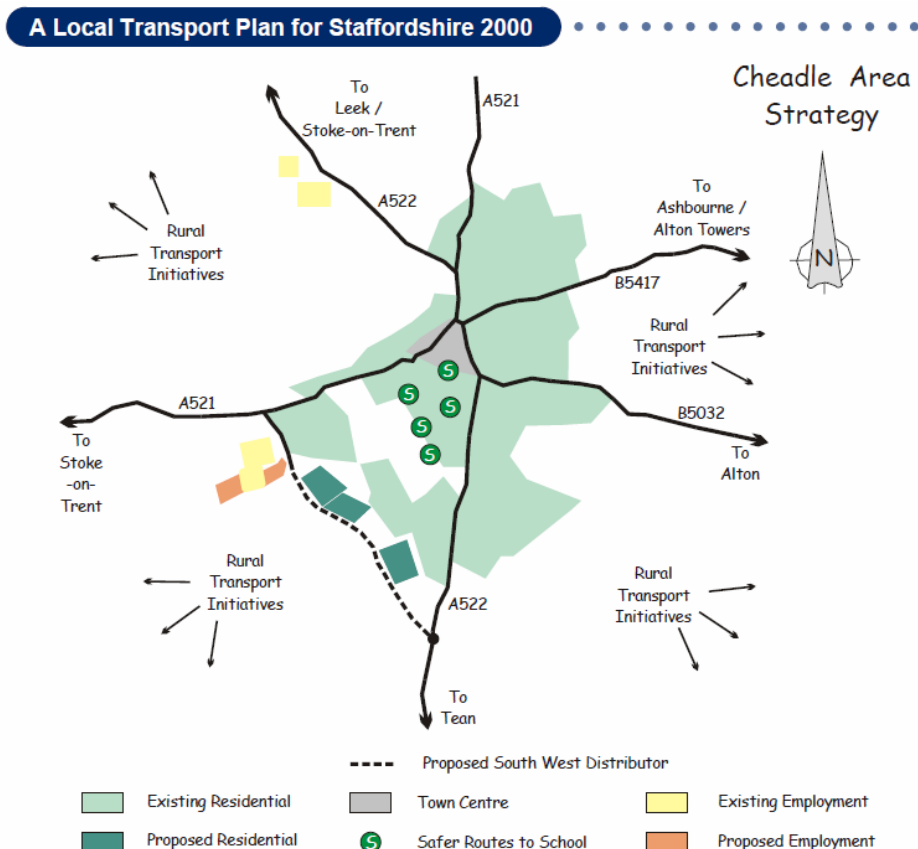


Figure 5-2 PM Peak Average Queue Length Increases

The red lines (running off the map) clearly indicate the predicted tailback of traffic post development. It is clearly a significant increase. Cheadle only has the A521 and A522 arterial roads.

It has been established for many decades that Cheadle has a road infrastructure constraint. We believe the matter dates back to the Mid 1930's as detailed by local councillors. The Transport Plan for Staffordshire 2000 highlighted a South West distributor (detailed below) and to further address traffic issues that 'The reliability, frequency and quality of public transport will be improved'. Neither has been delivered.



With the current state of our roads with countless long term pot holes in desperate need of repair, there is no rational outlook for significant investment in road improvements.

Subsequent to the 2015 Road traffic Survey there has already been additional significant building at the JCB site North of Cheadle that adds to Cheadle traffic. SMDC clearly are aware of the traffic constraints around Cheadle and have even explored a North-West link road option with JCB. The costs were understandably prohibitive. Yet the housing plans have not been reduced to account for practicalities not least to form a long term strategy to constrain and reduce Nitrous Dioxide Emissions.

Environmental Pollution, Quality of Life and Human Rights.

The Environment Act 1995 and subsequent Regulations require local authorities to review and assess air quality in their area from time to time to achieve air quality objectives. Further it a clear legal requirement that SMDC work to reduce locally and regionally in line with UK and EU law (EU 99/30/EC and the Air control Strategy 2000) the Level of Nitrogen Dioxide (NO₂)

Since 2010 a strategy is required to meet a maximum measured NO₂ level of:

- 40uG/m³ average per year
- The hourly average must not exceed 200uG/m³ more than 18 times in a year

Through a FOI request by Cheadle residents in 2017 figures show average levels are already close to target limits.

Request:

Under the Freedom of Information Act 2000, please provide copies of all NO_x (nitrogen oxide) readings taken in Cheadle Staffordshire for the past 6 years to date (28/10/2017) and any related Air Quality readings /comparisons.

Response:

NO_x data presented below. Results are expressed as an average annual mean, which is the average concentration of NO_x over a year. Results for 2017 have not yet been completed and so are not yet available. The Annual Mean Objective for NO_x is 40µg/m³

Results of NO₂ Diffusion Tubes, 2011 - 2016

Location:	Ref:	Annual Mean Nitrogen Dioxide (µg/m ³)					
		2011	2012	2013	2014	2015	2016
Cheadle (Leek Road Rbt_ North)	29	41.2	39.0	39.4	34.3	31.0	34.6
Cheadle (Leek Road Rbt_ Central) (mean)	7	41.0	38.4	38.5	39.8	37.0	39.1
Cheadle (Leek Road Rbt _South)	30	38.8	36.4	33.2	38.9	36.0	38.7
Cheadle Roundabout	45					29.0	37.0

It is clearly not acceptable and against basic Human Rights to plan increased congestion that will impact and raise NO₂ levels against a long term legal and ethical objective to lower NO₂ emissions. Not least when there are clear alternative solutions in regeneration of Brownfield sites in the City where public transport options can drastically reduce net NO₂ emissions.

The only way to make the local plan sound is to reduce the overall housing allocation based on an OAN that includes these wider issues.

Section 4 Affordable Housing

Affordable housing is a contentious issue not least in its presentation. Lack of affordability is a growing problem not least for our young and first time buyers looking to start a home. High levels of housing provision are retained based on the Lichfields report accommodating an up-lift on affordable housing. Despite a requirement for affordable housing historic data shows a very poor ability to deliver on affordable housing.

- 2014/15 19
- 2016/17 33
- 2017/18 5

The reasons for this are complex and are not only restricted to House builds. For example from the purchaser side, a typical young family are likely to require 2 vehicles to commute travel to employment (identified as outward commute migration in the traffic surveys) with all the associated on-costs of fuel etc (which aren't effectively included in true affordability) in addition to the mortgage cost and potential loss of income through any accumulated

student debt. From the community perspective significant infrastructure improvements are needed if any significant development is justified. The required costs of Roads, doctors and hospitals etc are not factored in to an excessive growth plan for example in Cheadle. Quality of life and health through excessive commute times are also not factored in a wider interpretation of 'Affordable Housing'.

The HIS has not set an annual target for Affordable Housing on the basis that the SMHA 2017 update indicates a required need above the level set by the OAN. Without effective Co-operation with Stoke City and the Potteries on a joint plan the HIS Section 4 clearly suggests all new builds need to be affordable. This clearly cannot be achieved especially in isolation and the context detailed above. Developers historically and continually seek amendments to lift affordable housing requirements after planning application have been granted reflected in the figures above. This process does not deliver affordable housing. It does further burden our struggling infrastructure.

Only by identifying affordable housing provision in our city on Brownfield sites where proven infrastructure exists (Roads, Rails buses, streets infrastructure drainage and lighting etc) can a practical affordable housing level for local need be determined with an effective cross council joint plan. Our City needs regeneration focus as do many high streets in the six potteries towns that need re-occupancy over shops and re-purposed mixed use high streets. Their need for certainty of development is far higher than in rural areas (something claimed as a barrier in SMDC's own plans in the Moorlands). Only when it is clear that derelict and waste ground will be rebuilt will Stoke and the Potteries be able to secure the very certainty for developers that they do genuinely need.

Section 5 Strategic Housing Market Assessment

The Plan makes some progress on identifying a need for smaller 1 and 2 bedroom properties for a growing age population. Cheadle Unite are aware of an increasing demand for suitable accommodation for an aging community. Providing bungalows and better care in the community provision has the potential to release 3 and 4 bedroom properties for our younger population. We believe this will be effective for local demand. However and in line with the above on affordable housing it can only be effective if development sits within realistic levels of development and the right type of housing is approved and built.

Accelerated Housing Delivery.

Cheadle Unite have been made aware of the 'Accelerated Housing Delivery Programme' including an SMDC report Dated 24th of April 2018. We believe there are a number of questions to the legality of the process and level of Councillor and community engagement in its creation and objectives not least in relation to the Local plan. We have not had time to interpret this information for comment but understand that it will be raised by other interested parties with whom we share concerns.

Cheadle Unite Committee.

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