

11.09.18

Mark Dakeyne BA(Hons) MRTPI
Planning Inspectorate

Dear Sir

May I refer to some of the factors addressed in the document 'Matters, issues and questions for the examination and hearing sessions'.

Matter 1

1.1. Is there evidence that the Council has not complied with the Statement of Community Involvement (SCI)?

I have been engaged in the Council's plans for the Staffordshire Moorlands since 2011 so I am informed to some degree and able to make representations on planning matters. On 30.03.12 I was given in writing a Respondent Number in respect of Staffordshire Moorlands LDF – Revised Submission Core Strategy. This was part of preparation for the Examination of the Core Strategy (CS) by Inspector Patrick Whitehead which took place early in 2013. At a later date I was given an ID number in relation to the Churnet Valley Masterplan (CVMp).

Hence I was a party to planning matters at Staffordshire Moorlands District Council (SMDC) from an early date and able to contribute to public consultation. This is sadly not the case for the wider population of the Staffordshire Moorlands. It is not the case for those residents who moved house into the Staffordshire Moorlands during the last 4 or 5 years. They are excluded. Recently a group of concerned locals including Parish Councillors called a meeting in a locality close to where I live. A show of hands revealed that members of the public had no knowledge of the Draft Local Plan (LP), had no knowledge of the deadline date for registration to comment and no knowledge of the dates when the Examination of the LP will take place. Even some local Parish and District Councillors are not sufficiently well informed to advise local residents. Hence residents are excluded from community involvement and the opportunity to express their views. There have been no flyers to residents, grossly insufficient, if any, public notices posted in towns and villages or published in the local press and the data available in some local libraries is a disorderly shambles which fails to inform the public and encourage participation. An 18"x15"x15" box randomly crammed with paper is a totally unsatisfactory means of engaging members of the Community. Those residents who do not have Internet access, and there are many in the Staffordshire Moorlands are completely out of the loop. This collection of failures and poor practice in Community Involvement surely make the LP unsound.

2.1. Is there evidence that the Council has cooperated effectively with adjoining authorities?

There is no evidence that SMDC have shown any desire to approach the authorities of Stoke on Trent and Newcastle under Lyme or any other neighbouring authorities to discuss future housing provision – a blatant neglect of sustainability.

2.5. Is there evidence that the Council has cooperated with Staffordshire County Council (SCC) and other infrastructure providers?

SMDC have not informed residents of preparation and consultation with SCC and other infrastructure providers regarding highways, education, sewerage, flood risk, health provision, minerals etc. A further example of disregard for sustainability.

Matter 3

1.1. *Does the evidence base support the requirement for housing of 320 dpa or 6080 dwellings for the LP period*?

In 2012 The Office for National Statistics (ONS) published Sub-National Populations Predictions which predicted a much reduced and levelling off of the population in the Staffordshire Moorlands. The 2015 Department for Communities and Local Government (DCLG) household requirement prediction calculated that this population trend would reduce housing requirement to 2573 in the Staffordshire Moorlands.

It should also be noted that there are greater than 1000 unoccupied properties in the Staffordshire Moorlands. Surely SMDC could offer incentives to potential landlords to bring these into use or promote the sale of these properties.

SMDC have persisted with a target in excess of 6000 houses. Of course the £1000 per house 'gift' from Central Government is a motivation to the local authority. It is not a benefit to local residents who place great value on the conservation of the local countryside and it is not sustainable in the long term. This disregard for statistics from ONS and the DCLG is not good enough. It fails to respond to the best interests of residents, smacks of short termism and disposal of the Crown Jewels, shows complete neglect for the Council's role as custodians of our precious landscape and is not sound planning.

The assertion that an increase in population of some 7000 residents is required to service local employment is nonsense. There are only three large scale employers – Lafarge, JCB and Alton Towers and the last mentioned's employment opportunities are seasonal.

Matter 8

5. Allocation at Anzio Camp, Blackshaw Moor and Bolton Copperworks, Froghall.

5.1. *Do the policies for the two sites meet the test of soundness?*

With regard to Bolton Copperworks (BCW) the dominant policy of which I am aware is the CVMp. This document advises that there should be a maximum of around 50 houses on the BCW site and that this severely contaminated site (cyanide, arsenic and cadmium) should undergo thorough and effective decontamination before the commencement of housing construction.

Any change to these conditions in the CVMp would be a severe threat to public health and would conflict with the CVMp and does not therefore stand the test of soundness.

Matter 2

3. Settlement Boundaries and the Countryside

3.1. *Is the approach to settlement boundaries for the larger and smaller villages justified (Policy SS2) particularly the removal of boundaries for the smaller villages?*

3.2. *Will the removal of settlement boundaries for the smaller villages lead to uncertainty and unsustainable patterns of development?*

Both 3.1 and 3.2 give cause for concern. Policy SS9, 7.60 and 7.61 proposes similar provision with regard to boundaries as Policy SS6, 8.1.65 and 8.1.66 of the CS. But in SS9 it goes on to say 'Boundaries are not defined for smaller villages, except where they have been excluded from the Green Belt. Limited Development, including infill will be supported subject to this Policy and Green Belt Policy set out in the National Planning Policy Framework.'

Undefined boundaries for smaller villages is a major concern in that the absence of a boundary in a smaller village means that its extent is unlimited so that development may take place on the perimeter edges of the village, until all villages join together. Villages lose their character and identity and we are left with the beginnings of a conurbation at the expense of the countryside. This policy is in conflict with the CS which on the subject of smaller villages states in SS6 8.1.66 that 'in order to guide development an Infill Development Boundary will be defined around those settlements within which appropriate development will be allowed.' And in 8.1.65 'Development on

a large scale would be unsustainable in these villages as it will generate a disproportionate number of additional journeys outside the village and may undermine the spatial strategy. However, it is recognised that there is a need to meet local needs in these settlements. This will be strictly controlled, both in terms of its scale and type in order to ensure that the character and life of the settlement is not undermined’ Whilst acknowledging the reference to the spatial strategy in 7.61 of the LP the assurances of 8.1.65 and 8.1.66 in the CS do not fit well with the removal of smaller village boundaries.

In Policy SS9, 7.60 states ‘a major issue for smaller villages is the loss of local population through lack of housing opportunities.’ Where is the evidence for this? 7.61 states ‘Development will be strictly controlled in order to ensure that the character and life of the settlement is not undermined.’ How will these controls be generated and to what degree will residents be included in community involvement?

Questions 3.1 and 3.2 of ‘Matters, issues and questions’ provide me with confusion and uncertainty in respect of Foxt where I live which is identified as a smaller village. Foxt was Open Country up to about 5 years ago. Then Foxt was provided with a Development Boundary drafted by two Parish Councillors, neither of whom were Foxt Parish Councillors and with no community consultation. The LP removes the Development Boundary – three changes in less than 5 years to the status of the Village is worrying. It is difficult to understand how the boundary in Foxt has undergone frequent recent redefinition when analysing the provisions in 8.1.65 and 8.1.66 of CS, Policy SS6.

During recent years SMDC set a target of 8 additional houses for Foxt. Already the Planning Applications Committee of SMDC has approved Planning Applications for more than 10 houses in the Village. I appreciate that 3 of these are properties that were formerly holiday accommodation which are now available for permanent occupation and I would ask that you confirm that the housing allocation for Foxt is now achieved and that the LP will not bring about changes to the CS in particular the referred to features of SS6. Any further development will not enhance Foxt which has no school, no shop, no post office and no bus service!

Matter 2

5. Green Belt

5.1. *Have exceptional circumstances been demonstrated to justify the alteration to Green Belt Boundaries?*

CS, SS6, 8.1.67 asserts that ‘The concept of sustainability argues in favour of concentrating most development in or adjoining existing built up areas.’ My assessment of 8.1.67 is that good care is applied to sustainability, providing of course that changes to the CS are not implemented as part of the LP. To preserve the concept of sustainability (in 8.1.67) SMDC should address strategies to incentivise the bringing into use of more than 1000 unoccupied properties and should take account of the needs of the residents of Cheadle, Leek and Biddulph whose lives are enhanced by close access to the wonderful Staffordshire Moorlands countryside. Provided of course that necessary measures are put into operation to conserve this valuable resource and this unique environment.

Yours faithfully

Peter Cowie