Submission to the HMG Planning Inspector in respect of SMDC 's Local Plan

Dear Mr Daykene,

As a member of the public with an interest specifically in the future plans for my village of Oakamoor, I am submitting this summary of my concerns regarding the soundness and legality of the proposed Local Plan on two specific issues; the lack of proper public consultation and the inaccuracy and /or lack of clarity of maps used in the documents with regard to the proposed removal of the settlement boundaries.

I understand that according to the following objectives in section 2.6 of Statement of Community Involvement 2016, the Council has vouchsafed inter alia

To clearly inform members of the public and all other interested parties how they will be notified about our planning policy consultations and how they can give their views on planning applications;

To ensure the process of making comments is as straightforward as possible both electronically and on paper;

To make our consultation material as clear as possible so that people understand the issues when replying to our consultations;

To plan consultation carefully to ensure that the opportunity is given for all interested parties to participate in the process whilst at the same time making the most effective use of Council resources.

Since belatedly becoming aware myself of the proposed adoption of the local plan, I have inquired of local residents in my village and my parish council but have yet to encounter anyone who has either heard of the details of the proposal, or has any deep knowledge of its contents and relevance to their local environment, and upon that evidence would call into question the Council's claim of providing sufficiently planned consultation and the opportunity for people to involve themselves in a well versed and constructive manner that such an important local matter as this plan should require.

In contrast to the amount of advanced publicity, leaflets and draft documents that were presented or mailed to households informing them of the consultation opportunities of the SPD's such as with the Churnet Valley Masterplan, the details of which were well publicised in the form of options, proposed drafts ,public meetings or village conversations in 2011, then redrafts with options upon which to comment further and then full adoption in 2014, there has been a distinct lack of information forthcoming.

Residents get their poll tax and election information sent directly to their homes. It should have been an easy enough method therefore to have alerted individual households to the situation and to make them aware of the opportunity to voice their opinion in a local plan that is now under scrutiny.

By not providing information it is no wonder that such little informed public comment has been made.

Added to this dearth of advanced notice of public consultation and the shortage of detail in the public domain that would have been an incentive to grab people's attention to any significant changes in the proposals and stimulated their interest in taking part in a community consultation, I have also discovered that paper copies of essential documents that should be openly available for easy inspection and understanding of what is in many aspects important and complex matters that will affect the future lives of local communities, have been difficult to access or obtain and in several cases have been unavailable to view despite SMDC claims to the contrary.

Such absence of vital information by accident or intent does not appear to me to be a true vindication that the Council has met its legal obligations as far as clarity and comprehension of its objectives and proposals in its Local Plan are concerned.

How can anyone take full participation in a meaningful way if elements of basic information has been withheld or unavailable?

My second point of contention is the concern or confusion over the settlement boundaries and the proposal to remove them. This again involves serious flaws in the consultative procedures principally stemming from the inconsistent use of maps in the documents being presented which offer alternative information depending upon which is being referred to, as well as containing glaring errors in their cartographic accuracy.

So once more the ability of members of the public to grasp the correct information is misleading and throws into question the veracity of the consultation process.

If what limited information that has been in the public domain is untrustworthy or plain wrong, how can the responses to it be considered justifiably fair and reflective of the truth of what is planned?

From my perspective I can and will produce before the inquiry clear evidence of such errors using the maps of my village of Oakamoor where there are two different maps being referred to the documentation which carry historical errors the background to which I will elaborate upon below, as well a lack of any reference to the Conservation Area boundary which was established in 2016 and which omission accounts for further confusion as to which village boundary is to be removed or retained.

We appear to have a village boundary, a conservation boundary and an infill boundary and a lack of clarity as to which one is the actual one to be removed or retained and, as you may well appreciate, local public opinion, if held at all because of the overall lack of awareness of the situation, is divided as to which is the relevant one to be considered in the proposal to have the boundary removed.

This of course precludes the question of whether the public are able to consider the merits of any boundary being removed and from my point of view the negative effect that will have upon controlling future development with in the village.

There does not appear to be a balanced view of the arguments for and against such a proposal within the documentation that either explains the motive behind it, or why it is now envisaged as a possibility having only a few years earlier initiated such boundaries and what has changed to make this new directive imperative.

Again, this lack of basic information impedes the public notion of whether it is a good idea or poor idea and without that knowledge restricts its involvement in the process. Before developing the argument further let me explain the background to the glaring deficiencies in the maps being used as this in itself demonstrates the Council's failure to take account of public response even in a more considerate and consultative process which happened in the past and as alluded to earlier.

When the Churnet Valley Masterplan was presented for public consultation between 2011-13, we had what was termed "a village conversation" at Oakamoor. Public questioning of the actual planning officers in attendance was restricted and members of the public were only able to make written comments within groups sitting around the table. These comments and opinions were to be collated by a representative from a consultative agency contractor who, being from outside the area, had no real geographical knowledge of the area, or the maps with which they had been furnished.

It was politely pointed out at that meeting that the maps we were discussing were deficient and inaccurate and the specific errors were drawn to their attention.

Excluding all the other outcomes of this process which were also ignored at the time when the masterplan alternatives or options were put forward for the public to make their preferences, it now appears from the map details being used once more in these 2016-18 consultation documents, that the very same inaccuracies are being reiterated.

It says very little about the importance of the public viewpoint in these consultative matters and a lot about the inefficiency of the instigators of this new proposal.

Accordingly, I submit that the grounds for accepting this plan as it stands are not sound or legal, and would urge you to investigate further.

David Walters,