

**From:**  
**To:** [Programme Officer](#)  
**Cc:** Dear Ms Weate  
**Subject:** 24 September 2018 11:13:00  
**Date:**

---

#### Matter 1

##### Issue 1

The consultation/participation is deeply flawed, how can it be necessary to carry out so many phases, this fourth consultation, the Submission Version, has only generated 559 representations from 200 individuals. The number of responses at each phase is instructive:

-in 2015 there were over 5500; in 2016 there were over 8600; and in 2017 only just over 2600.

The moorlands population are clearly suffering from consultation fatigue and a sense that the Council will continue until it gets what it wants regardless of what the residents say. This response level to this final consultation falls short of being representative and therefore fails to be compliant. Any argument that the changes made at each phase of consultation are in response to the public response is demonstrably false.

##### Issue 2

2.1/2 The DfC should not be regarded as a "tick box" exercise. If Staffordshire Moorlands DC (SMDC) was serious about preserving the Green Belt, containing development in relationship to infrastructure in our three towns and preserving the rural state of our large and small villages they would have come to an agreement with Stoke on Trent City Council to transfer housing allocation to the many easily developed brownfield sites available in the conurbation. The housing allocation appears to be driven more by the financial aspects of the "new homes bounty" and the eventual Council Tax generation than by any real need. The SMDC's forward budgets only balance if these sums are included.

#### Matter 2

##### Issue 3

The removal of village boundaries is unsound and has no legal basis and is therefore non compliant. These boundaries have been a cornerstone of creating a definition of the village, not just for planning purposes but for the sense of ownership and community. I can speak for the villages in my parish of Kingsley where the villages of Whiston and Kingsley Holt are threatened by this manoeuvre (Kingsley itself has the particular protection of being surrounded by the Stoke on Trent Green Belt). The residents are happy to accept sympathetic infill and indeed the Parish Council has suggested where this could be in previous consultations. Without the concept of a village boundary the residents sense the threat of the whole shape and integrity of a village being changed purely by the desire of developers to maximise their profits. In this version of the plan 25% of the total housing is being allocated to the rural areas. The plan gives only general guidance but no certainty as to how this will be achieved in practice, further adding to the concern relating to the removal of the village boundary.

There is a lack of sound plans to tackle the requirement for sustainable development in rural areas. Public transport in the form of bus services is either non existent or the current meagre schedules are either already diminishing or under threat of reduction. Although the plan is full of fine words about the reduction of emissions and pollution the reality is that were it to go ahead there would be a worsening of the current situation of the Staffordshire Moorlands which already sits above the national average for Carbon Dioxide. Whilst it is pleasing to note the Council's support for re-opening the rail links in the District it is clear that there is no possibility of any viable commercial service within the lifetime of this plan.

The Churnet Valley Strategy remains unsound as it contains an incontestable contradiction. It seeks to promote tourism with short and long stay visitor accommodation by the expansion of existing and the provision of new tourist attractions and facilities. But the strategy has no actual measures to limit the impact of private vehicle use or indeed offer any actual evidence as to how it will practically improve road access or support alternative means of transport.

#### Matter 3

##### Issue 1

No confidence can be ascribed to the choice made on the housing numbers required because:

-at a National level it would now appear that the housing need predictions are significantly overstated. The

office for National al Statistics in a report released on 20th September 2018 has revised its 2014 estimate of 210,000 new households formed per year down to 159,000. This is a 24% reduction.

-each iteration of the plan has generated different figures, this does not, in my opinion, indicate a refinement and improvement of the numbers but rather that there is in fact no sound basis for determining a correct number

-the track record of the Council in actually achieving development is poor in terms of total numbers of houses built and even worse for “affordable” housing. There is no evidence of how to deal with this issue which shows that the plan basis is unsound.

-the plan is also unsound in that it does not demonstrate how the Council will prevent Developers stockpiling land in order to generate increased profitability based on appreciating land values. This works directly against the concept of affordable housing.

-the Council, again apparently driven by self interest, continue to collude with developers in seeking to permit large “greenfield” sites which maximise their profits.

Further inputs to the housing plan are the provisions for employment growth and land allocation which do not appear to add up. Looking at Table 7.4 the completions over 5 years amount to 2.39ha which is a rate of 0.48ha/year. There is no apparently sound basis for the predicted requirement of 1.76ha/year over the remaining 14 years of the plan duration.

#### Matter6

The three town area strategies are all insufficient in that they fail to recognise the looming changes in retail business. The high street experience is under threat from on line purchasing but the response of SMDC is to increase business rates and charge ever more for parking.

#### Matter 8

The Cheadle Area Strategy is unsound as the only features which the Council can practically achieve using its own powers are the granting of planning permission for the two major housing developments. All the rest is just a wish list largely beyond its ability to promote. The traffic congestion which systematically paralyses the town needs to be addressed by actual road building, not safeguarding of potential routes. The situation in Cheadle demands infrastructure improvement before any additional housing or significant commercial build.

This document prepared on 24th September 2018

Sent from my iPad