

Town Council - Comments Re Planning Inspection Feb 2020

Following Cheadle Town Council's comments on the 'Main Modifications to the Staffordshire Moorlands Local Plan Submission Version 2018' (Detailed in EL10.001) sent to the Planning Inspector (23rd October 2019) by our clerk, we wish to make the following additional comments on the Matters issues and Questions (MIQs) raised by the inspector Dec 2019 (Doc Ref EL11.001), in relation to: Session 2 - Matter 2 'Housing Land Supply Update'.

The Question raised by the inspector relates to Housing Land Supply and Housing build trajectory.

The District Council have updated the Housing Implementation Strategy (HIS) (Doc ref EL10.004) following comments from the Inspector. The HIS includes a table on Page 11 detailing the SMDC housing build projections up to 2033. Despite the excessively high target of 6080 dwellings, the table shows a projected potential build of 5809 dwellings to 2033 across the Moorlands with around 1236 dwellings for Cheadle. This is very close to the 6080 (albeit unrealistic), target. In conjunction with a Liverpool method of assessment of delivery (over the full plan period rather than over 5 years), there is no justifiable reason for an assessment of trajectory on the grounds of inadequacy, especially given these are inflated figures, by 2031 the HIS still shows a surplus provision of 192 dwellings. Further, in our submission on the 23rd Oct 2019 we highlighted how apart from sitting well above a balance level, 6080 dwellings sits massively above the 2015 DCLG Housing Projections (and 2012 ONS Sub National Population based figures) predictions which detailed only 2,573 dwellings were required, this figure drops even further when we factor in the latest 2016 ONS Figures with a net population increase of only 1534 to 2036 which based on an average of 2.4 occupants per household would require only around 650 dwellings. A figure of 6080 approaches 10x the genuine natural requirement. It is more than reasonable to argue that monitoring trajectories against such inflated figures is not appropriate.

Further, there are numerous reasons for concern in planning for 6080 dwellings when the ONS and DCLG figures are much lower and in tasking the District Council to deliver on those unrealistic levels. Apart from failing to deliver on all the wider metrics that we have highlighted (environmental, health, pollution etc), It provides developers with the opportunity to argue for release of more Greenfield land, reduced or no 106 contributions, produce houses with inadequate M4 Category 2 (aged mobility) access and bedrooms that do not meet NDSS recommendations. By way of example the following example from the Campaign to Protect Rural England details how it impacts on Greenfields over Brownfield sites:



CPRE fights for a better future for England's unique, essential and precious countryside. From giving parish councils expert advice on planning issues to influencing national and European policies, we work to protect and enhance the countryside.

Our objectives
We campaign for a sustainable future for the English countryside, a vital but undervalued environmental, economic and social asset to the nation. We highlight threats and promote positive solutions. Our in-depth research supports active campaigning, and we seek to influence public opinion and decision-makers at every level.

Our values

- We believe that a beautiful, tranquil, diverse and productive countryside is fundamental to people's quality of life, wherever they live
- We believe the countryside should be valued for its own sake
- We believe the planning system should protect and enhance the countryside in the public interest



This report has been informed by independent research undertaken by Housing Vision and Tibbalds entitled *Smarter SHMAs: a review of Objectively Assessed Need in England* which can be accessed at: www.cpre.org.uk

Cheadle Town Council therefore asserts that to make the plan viable in the interests of its community: 1 SMDC are not assessed against delivery of unrealistic stated 'aspiration' targets.

I.e. There should be no targets that do not tally with genuine ONS and DCLG figures and local aspirations, not least as they do not sit within a balanced strategy.