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Application Reference No. : SMD/2021/0610 Site Address: Land East Of Froghall Road Cheadle Staffordshire
Comments by: Mark JohnsonMoorlands Climate Action

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Submission: Objection
Comments: SMD/2021/0610 Land East Of Froghall Road, Cheadle, Staffordshire,

Addressing Climate Change in Major Applications before SMDC

We note that in June 2019 declared a Climate Emergency and has made a pledge to make the District Net Zero in terms of Greenhouse Gas Emissions by 2030.

We note the unmistakable turn towards action on climate change through the mechanisms already, or potentially available in the planning regime.

We note that in July 2021, Eddie Hughes MP (Parliamentary Under Secretary for the Ministry of Housing Communities and Local Government) recognised ‘the vital work of councils to mobilise their efforts to combat climate change and meet our ambitious net zero targets’ our Planning for the Future white paper is clear that environmental concerns and our transition to net zero should be embedded in the planning system’. Some of this lies in the future, of course, and the current application will be dealt with in line with current guidance.

In the meantime, we note the continuing local debate as to how the net zero this should be achieved through the planning

regime at SMDC. Moorlands Climate Action is a member of the SMDC Climate Change Working Group and was present at the August 5th presentation to that group by the SMDC Head of Development Services. At the meeting the head of SMDC planning services outlined continuing uncertainty at a national level about how policy on climate change (clearly expressed and recently strengthened in the National Planning Policy Framework) will be reflected in future planning legislation and building regulations.

We point, however, to the clearly expressed opinion of the head of Planning Services on August 5th that SMDC already possessed substantial powers in respect to action on climate, via the planning system.

(We note also the surprise October 14th announcement by the cabinet member for climate and biodiversity Cllr Joe Porter at the Climate Matters conference in Stoke to the effect that SMDC will be shortly bringing forward a ‘best practice document’ for developers on climate considerations. We do not know what this may contain, but it must be taken as evidence that SMDC is now responding to widespread pressure (including from its own Housing Climate Working Group) to further express national policy on climate change through legitimate means in the planning process.)

We note that the SMDC Local Plan, despite being adopted in September 2020 (and therefore not fully able to reflect the latest developments in national policy on climate and planning) nevertheless does set out unequivocal planning policies on sustainability that are applicable to this application.

This is expressed first in general, but unmistakable terms on Page 28 of the Local Plan. ‘Planning has a key role to play in mitigating the causes and effects of climate change through the location and nature of development and by helping to shape places which have lower carbon emissions and are resilient to climate change. The District should aim to contribute to the wider Government objective of achieving a low carbon future. Energy efficiency in the design, construction and use of buildings will be vital to reducing the impact of development on climate change and on Page 73 (Sustainable Use of Resources) The need to respond pro-actively to the issue of climate change has been identified as a major challenge for the District and planning has a key role to play in ensuring that development minimises its impact on the environment, helps to mitigate and adapt to the adverse effects of climate change and makes efficient use of resources.’

This general intention is translated into Policies SD1 and SD3 of the Local Plan which state that: ‘The Council will require all development to make sustainable use of resources and adapt to climate change. This will be achieved by: (4) Supporting development that is located and designed to minimise energy needs and to take advantage of maximised orientation (subject to design and landscape policies) to achieve energy savings in line with Policy SD 3 (5). The Council will require applicants for all major-scale planning applications (10 or more residential units or 1,000+ square metres floor area) to demonstrate that they have considered the energy efficiency, water conservation, sourcing of construction materials, and site orientation aspects of the scheme, and where possible the feasibility of integrating micro-renewables. The degree of detail expected will depend on the scale/complexity of the proposal. (6). The Council will encourage developers to investigate the potential for re-using construction or construction waste materials, especially those sourced locally (which can include those minerals available on site, as appropriate) and integrates where possible on-site waste management facilities.

This is reinforced in the SMDC Design Guide Supplementary Document Page 26, from which we highlight: the following principles: ‘Design first to reduce demand for energy and increase energy efficiency’ and ‘Choose materials with low embodied energy.’

We note that the Planning Statement accompanying the current application for the site goes to considerable lengths to argue that the application meets all relevant requirements of the NPPF as well as the Local Plan (and where it doesn't meet the Local Plan, ingeniously explains why it doesn't need to).

It's efforts to address the council's climate imperative (as expressed in the Local Plan and the NPPF) are by contrast, perfunctory. They consist of two brief paragraphs in the Planning Statement:

6.35 The application site is sustainably located, benefitting from being near local bus stops and within walking distance of a range of services and amenities, reducing dependence on private vehicle use.

6.36 The proposed development would also contribute to reducing CO2 emissions through the installation of ultra-low emissions boilers to deliver sustainable family homes in accordance with Local Plan Policy SD1. This can be controlled by a suitably worded condition.

(We note that the question of the many additional car journeys that would be generated by this edge-of-town development will be fully addressed by other submissions. We note the attempt of the applicant to inject a note of humour into a long and detailed document by describing the development as 'sustainably located'; we doubt that sense of levity will be shared by existing residents of Cheadle and around.

We note also the macabre spectacle of a developer such as Bloor Homes using 'a lack of affordable housing supply' as an argument for undermining the Local Plan. Bloor Homes and the industry as a whole have regularly used Viability Statements as a mechanism for scaling back freely made undertakings on affordable housing, so helping create the very problem they claim to address in this application.)

We suggest that the commitment on renewable energy under 6.36 is ludicrously thin, depending solely on one phrase, 'the installation of ultra-low emissions boilers'. This phrase is commonly understood to mean boilers that perform better on NOx emissions (primarily a particulate issue and not a question of CO2); boilers that meet these standards are, in any event required under building regulations.

The Planning Statement therefore amounts to no more than a commitment to meet current building regulations and can in no way be described as satisfactory on emissions.

We note that domestic gas boilers will be banned from new builds from 2025. To allow such a major development to proceed in this manner at this time will allow the building of houses that will be obsolete in energy terms by the time that are put up. This will at some time in the foreseeable future, require substantial investment by both the purchasers and, very likely, public funds in the form of grants. The developers will be long gone.

The application states that such matters 'can be dealt with in conditions'. We respectfully suggest they cannot and should not be dealt with in this manner, particularly as the applicant has shown no meaningful commitment to either the council's requirements under the Local Plan, the changing landscape of the NPPF with regard to energy and planning, or national government policy.

The Applicant lacks neither the time nor resources to deal seriously with this issue at this stage (as demonstrated by the efforts it has dedicated to overwhelming the spatial objectives of the Local Plan).

Moorlands Climate Action therefore urges the council to reject this application as 1) it makes no real attempt to address the question of energy (as detailed above) and 2) it represents a sophisticated effort at undermining the Local Plan.

At the very least, were the application to proceed in principle, we urge SMDC to a) require detailed submissions from the developers in regard to Local Plan Policies SD1 and SD3 and to b) regard the fulfilment of the objectives expressed through these policies as central to the decision on the application.

We suggest that this step might best be achieved by requiring a detailed Energy and Sustainability Statement from the developer.

Mark Johnson

On Behalf Of

Moorlands Climate Action

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