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**Cheadle Unite Objection to:
SMD/2021/0610 '228 New Dwellings at Broad Hayes Farm, Hammersley Hayes, Cheadle**

The SMDC Local Plan was adopted little over a year ago and yet already steps are being made to ignore it.

Cheadle Unite commented on adoption of the Plan in October 2020 including the urgent need to address Climate Change and reduce our Carbon Footprint. We submit those further comments (attached pages) as grounds for objecting to any further build outside the Local Plan. This includes application SMD/2021/0610 '228 New Dwellings at Broad Hayes Farm, Hammersley Hayes, Cheadle' a development which proposes to build on green fields which we believe should clearly not be acceptable.

The Local Plan should in fact be pulled back to occur over a longer time frame with no penalties for failing to reach unrealistic and unsustainable targets, as it is clear that we need to act now for the benefit of our environment and for our younger generations. Developers, including Bloor Homes, continue to argue about SMDC's failure to meet those unrealistic and unsustainable targets, using them against the council as leverage for development. They present a 'so claimed' solution which includes affordable housing. In reality, if they are ever given outline planning permission, they then produce viability statements claiming they have to charge more for the properties, making them unaffordable to the local community. There is a clear evidence base that this happens time and time again.

Boris Johnson has already indicated there should be no more building on green fields. Focus must be on renovation and reuse of brown field sites. Our Major cities and towns face a clear challenge to address declining footfall not least due to the declining use of retail spaces. Developments must only take place on Brownfield sites around existing infra-structure (Rail, Road and Canals). This must be a priority.

Cheadle is a town of limited road infrastructure that cannot be improved (without major environmental road infrastructure that cannot be justified both in terms of environmental impact and in financial cost). Further development on green fields and agricultural land goes against the wishes of the community expressed for over a decade and as recently as this year (2021) in the 'Big Cheadle Questionnaire' (over 500 respondents). Again the vast majority are against more houses. The Local plan promotes Cheadle as a commuter town with easy access to HS2, this is no longer acceptable (not least when in fact we are not near to and cannot sustainably access/use HS2).

To date SMDC have failed to make an effective commitment to our environment. The Moorlands is well placed to make a net negative carbon footprint contribution by preventing green field developments and can help the rest of the country by encouraging tree planting and re-forestation across the Moorlands and Peak District. Something that is unlikely to be repeatable in many areas of England.

It is not acceptable to expect communities to adopt expensive heat pumps and greener practices to save the environment when a plan to grow the community by 25% in 13 years, along with all the development carbon footprint and suggested commuting via HS2, is clearly going to more than wipe

out any costly and life changing benefits individuals can make for the environment. We need to see a change in strategy regarding the environment from SMDC that leads by example.

To date no effective action has been taken. SMDC continue to externalise environmental issues and do not take ownership to protect and lead on our environment. This has been made clear by the 'Moorlands Climate Action' group who staged a recent demonstration in Leek (attended by Members of Cheadle Unite). Continuous inaction will be seen as clear negligence by future generations.

Further Comments (Extract from Oct 2020):

The Local Plan 2018-2033 adopted in Sept 2020 sets out significant developments for the Staffordshire Moorlands that go well above natural demand and a strategy in tune with the urgent needs to address Climate Change.

The plan draws from the assertion of National Planning Policy (NPP) to sit strongly in favour of 'Sustainable Development', two words that clearly sit at odds with each other and the urgent need to cut back on our carbon footprint on the planet. Environmentalists at the Intergovernmental panel on climate change (IPCC), including Professor Zoe Robinson NTF PFHEA of Keele University who made a number of presentations to SMDC in Feb 2020 year, point out that that we have barely 10-15 years to drastically cut our emissions and live in harmony with the planet [1], the timeframe of our local plan, and yet over that period the local plan draws on and promotes the aspirations for growth and of our (apparently near) commuter links of HS2 via the A50!

It takes many decades (80+ years) for any reductions in our carbon footprint to feed through the system and for our future generations to see a benefit. If we don't act now within 10 years the global average temperature is set to rise above 1.5 Degrees a point at which the environmental impacts become very damaging.

The NPP policy draws on the need for housing provision with the (wave anything through) Localism Act 2011, whilst failing to address the obvious huge levels of stockpiled land, largely Brownfield sites that now sit in private hands and that could provide adequate housing provision in a far more sustainable way around existing infrastructure (roads, rail, canals, schools, doctors etc). Instead it promotes easy development on agricultural and green field sites remote from infrastructure and a sustainable future as outlined by the Campaign to Protect Rural England [2].

How can the promotion of HS2 and our links to its easy access be a way forward? The implication is that a significant amount of commuter travel is a core deliverable of the local plan. It has been long established that the earth has limited resources and 'peak oil' output sits within the next decade (if it hasn't already happened) [3] and we should look beyond it, not least to protect what we have left but also to ensure what remains isn't squandered to destroy the planet.

London sits unique as the only area of the UK that is allowed to reduce its housing provision. The vision of the rest of England feeding that metropolis is surely something of science fiction that should be left in history, and yet that is the plan. No justifiable case was or has been made for HS2, it is but a hobby horse and fictional drive to reward large scale developers linked to central government. The reality on the ground is that our local bus services and infrastructure need the

investment that is going into HS2. Many city centres, retail parks and commercial properties lie increasingly empty. It is here that housing provision fit for the future should be built.

One of the few positives of the Covid-19 outbreak is that it highlights that we can, to some extent, reduce our dependence on travel. Historically we lived near to where we worked and that is a model we must aspire too when we cannot work online, not one of long distance commuting and the idea of cities simply being high value commercial property, owned and managed by the elite to run corporate structures. These areas need reclaiming for society.

There is a staggering disparity between the constant push for onwards and upwards against a backdrop where quality of life implications are rapidly set to decline. We have gone through the industrial revolution, the technical revolution and are well advanced on the predicted consolidation phase a process that was known to lie ahead by the Department for Trade and Industry (when it existed years ago before being dismantled in 2006).

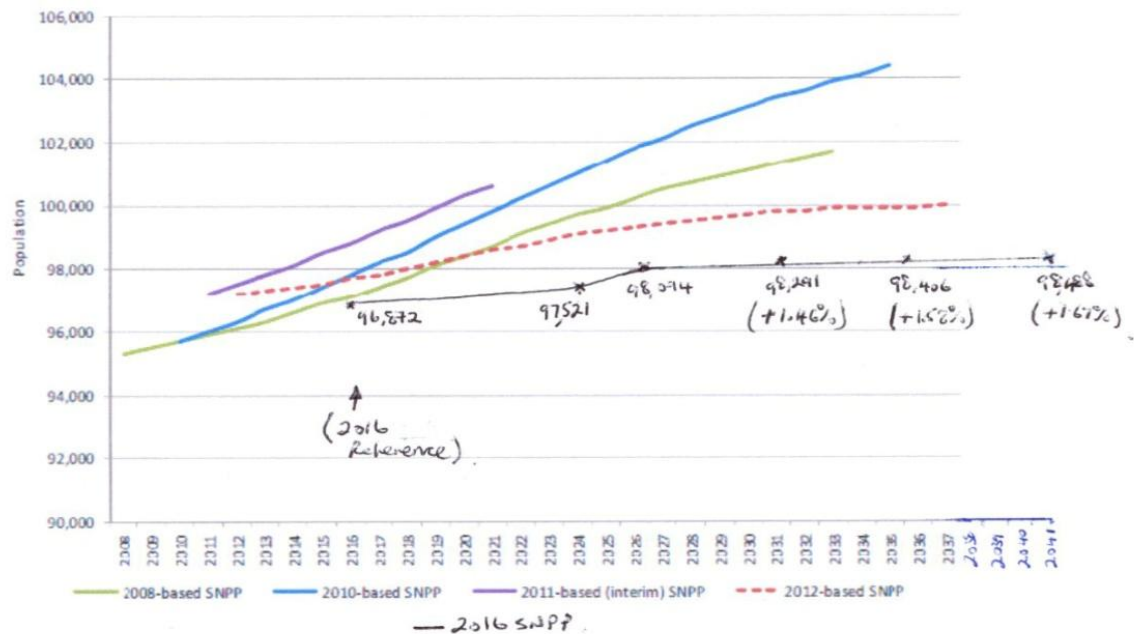
In the local plan, Cheadle is set for 1236 Houses to 2033 with an average occupancy of 2.4 per household, that relates to a population increase of 2,966 on our current population of 12,000 a Population increase of just under 25% in just 13 years.

How does that tally with national and local demand and aspiration?

The Office for National Statistics tracks and predicts natural demand. The following graph shows the historic trend with newer figures added.

Figure 2.2 presents a similar picture for Staffordshire Moorlands, albeit the 2012 starting point is considerably higher than for the 2008-based SNPP and 2010-based SNPP equivalents. However, whilst these historic projections increase by 5,200 and 7,100 respectively between 2012 and 2031, Table 2.2 indicates that the latest 2012-based SNPP increase by only 2,600 over that time period.

Figure 2.2 Comparison ONS 2008/2010/2011/2012 based SNPPs for Staffordshire Moorlands District



Source: NLP Analysis / ONS 2008/2010/2011/2012-based sub-national population projections

Back in 2010 when the local plan was first muted the ONS prediction was a population growth of 7,100 to 2031 (the difference between net births and deaths). This prediction was reduced to 2,600 in 2012 and then to 1,534 in 2016. The Preliminary national figures for 2018 Show a UK wide population drop of 400,000 by 2028 and 900,00 by 2043. That ½ a million drop over the local plan period would suggest a significantly lower natural demand figure than 1,534, a figure that should significantly ease climate pressures housing demand and provide a path to a sustainable future.

Local opinion has been expressed through at least 5,500 responses to the local plan and the vast majority were against the excessive housing development provision and building and development on green fields, agricultural land and destruction of our rural heritage an opinion that sits in line with the ONS predictions and the climate perspective.

But they have been ignored in order to continue the same path. When the ONS figures came out in 2016 instead of changing the local plan to recognise environmental change and looking to managing a natural flattening growth curve i.e. true sustainability, the 'Sustainable Growth' rhetoric was retained. Consultants (Lichfields) were engaging by SMDC and a new 'Oxford Model' element added to the plan in order to trump local, ONS and climate aspirations with a claim that we needed 7,697 migrants in the Moorlands to retain the working population (up by only 85 working to 2031). Whether that is true or not, it is not a sustainable model. Apart from having no control on who enters the Moorlands, if for example they are of working age, it ignores any chance for our community to naturally adapt, for example by working to an older age if we wish or by entering

professions earlier rather than possibly choosing University. Further it is not sustainable and short sighted. What for the next period post 2033 to 2048 another 10,000 migrants? It is by definition unsustainable.

Cheadle Unite promoted a far lower level of housing for the Moorlands for Cheadle, Leek and Biddulph and protection of all areas down to the rural villages and hamlets. The reality is that 640 houses (nearly a 1/10th the actual figure of 6200) would accommodate the natural demand of less than 1,534 population increase and while over provision of sites could be seen as forward planning, it generates real issues when those figures are set as targets (detailed later). We also pushed for SMDC to work with our Local City Stoke-on-Trent and the much needed regeneration of demolition sites across the city after the collapse of the 'Renew' Project and for a co-ordinated Strategy on Bus routes and provision.

Before the Localism Act 2011 there was a much maligned Regional Spatial Strategy that was intended to provide a cohesive policy to address regional issues (regeneration and integrated transport strategies), the right idea that failed due to political barriers between councils and a fight for investment.

The Localism Act which replaced it creates a much more competitive environment between SMDC and our local city, still competing for funds (such as the new homes bonus), but now disconnected from any effective strategy for the environment, climate and a social policy that works for example on bus routes and infrastructure. Despite its name, in reality it prevents local residents from protecting their local environment unless they are prepared to go to the High court to demonstrate how it has a direct impact on them and their children's future.

On line shopping and out of town shopping has decimated our local town and city centre retail spaces. The promotion of increased housing as a fix is disingenuous. An increase of commuter property owners further out of town is not likely to rejuvenate our high street. Their plight has been used as a marketing tool to push for a swell in housing provision. As a community we need to value their presence and solve this problem from within with increased local usage and tax incentives to help them survive. As fuel costs rise and transport becomes more costly we do believe the high street will become even more important again but that is likely a decade away from now.

Why it matters.

The adopted local plan details a target of over 6000 properties across the Moorlands. Setting such a high figure (nearly 10x natural demand) creates genuine planning challenges.

- It miss-sells the aspirations of the town, angering residents and presenting a constant unknown on the future of their town and home and if they will be affected
- It sets the level so high that we can't protect green fields over Brownfield sites (when in reality there are enough Brownfield sites to meet natural demand).
- Over sells the infrastructure capacity in terms of Doctors, Schools, Roads, Library, Police, Leisure facilities etc
- Fundamentally fails to address the problems created by climate change and provide a cohesive strategy to reduce our carbon footprint

- Instead of appealing to local developers and traders it aspires to larger scale developers less likely to employ locals, drawing from rather than adding to our economy
- Undermines the local community's ability to have say on the type and number of houses (for example houses that meet national standards on bedrooms sizes, Suitability for aging population i.e. accessibility requirements, car parking spaces, garden space, no or few bungalows)
- Allows developers to get the upper hand in getting what they want (price optimisation against a backdrop of land banking, increasingly unaffordable for local residents).
- A failure to recognise and address any underlying challenges such as local funding or lifestyle changes that should be happening

If the objective of such a high number was to make over provision to force a competitive market it has failed and continues to fail. Whenever land is made available, developers simply sign option agreements with the land owners for minimum outlay and then retain effective control and development rights over that land. Rather like a card game where you keep handing out cards to the developers until they have a guaranteed winning hand. They then simply end up with the entire deck in a no lose arrangement, playing their hand when they can secure the highest profit margins.

What needs to happen

The Target figures set by SMDC of over 6000 properties should be seen purely as aspirational based on a 10 year old plan that has only just been approved and one that is behind the need for change based on the climate. It should not be seen as a failing by SMDC or Central Government if those figures are not met and they clearly should not be set as measurable targets, against which changes to promote further development should be instigated. Further focus should now be on reducing our Carbon footprint not increasing it.

Cheadle Unite.

[1] <https://www.bbc.co.uk/news/science-environment-45775309>

[2] <https://www.cpre.org.uk/resources/set-up-to-fail-why-housing-targets-based-on-flawed-numbers-threaten-our-countryside/>

[3] https://en.wikipedia.org/wiki/Peak_oil