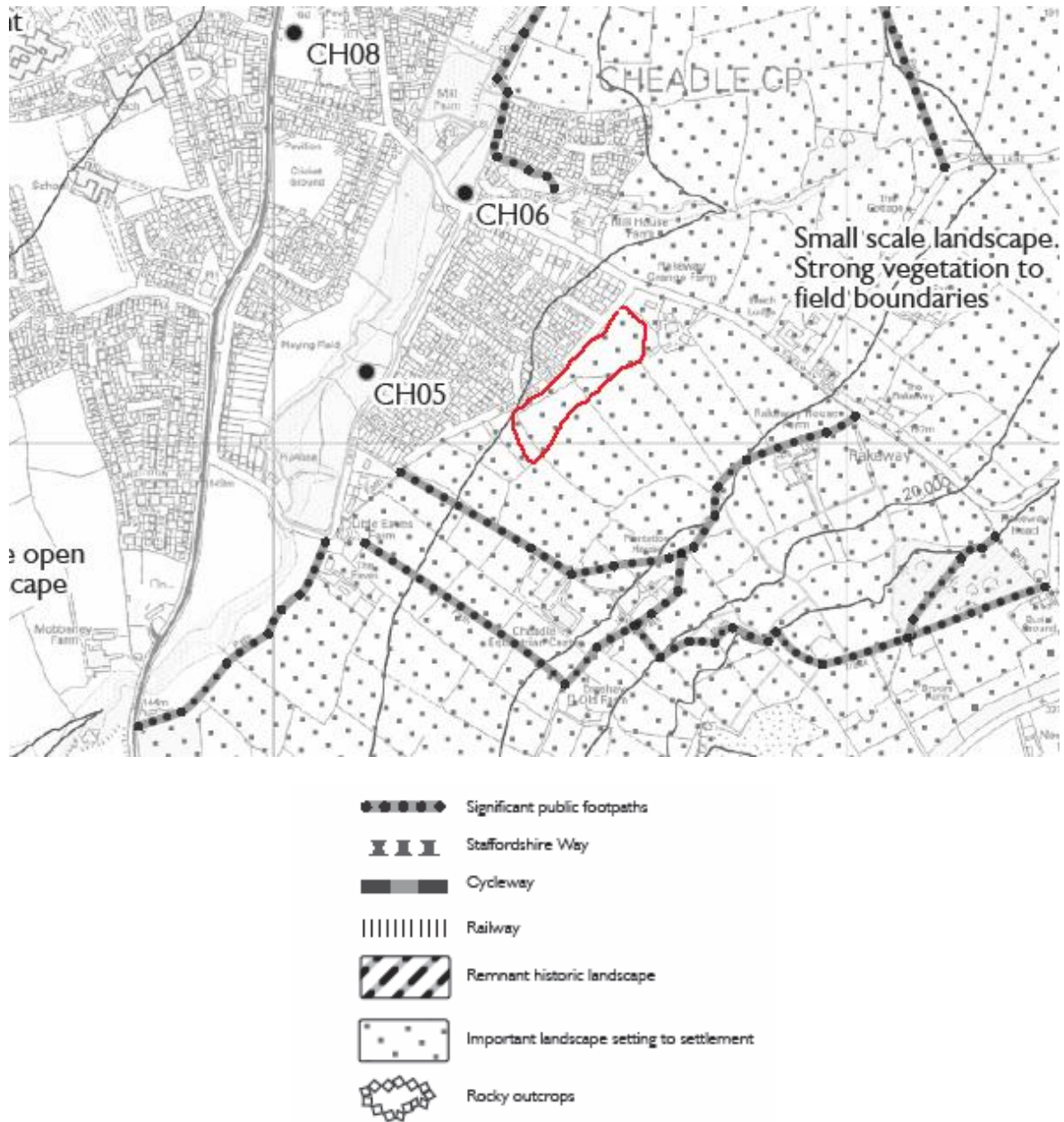


Reasons for Objection to SMD/2025/0243 Land East of Manifold Drive:

1) Landscape Visual Impact Assessment.

The Landscaping and Settlement Character Assessment for Cheadle (ST10553-2b) shows with the dotted land that the proposed site (marked over in red) clearly sits within land designated 'Important landscaping to the settlement' as shown below:



The Document states: *'The area to the south east of Cheadle is a small scale landscape with strong vegetation along field boundaries it is an area of important landscape setting for the settlement.'*

The developers have commissioned a Landscape & Visual Impact Assessment by Tyler Grange on the proposed site. The document is clearly biased in my opinion towards creating an argument to allow development. This is evident right at the beginning of the document in section S1 where instead of starting by referencing the above, the commissioned LVIA asserts:

'The Site is not subject to any landscape designation at national or local level, although local non site-specific policies relating to landscape character and green infra structure are applicable.'

The underlined statement above in the LVIA document clearly attempts to separate off the proposed land from any designation even though it clearly sits within the area designated as 'Important landscaping to the settlement' in the Landscaping and Settlement Character Assessment document for Cheadle.

The developers Planning Statement then summarises the commissioned LVIA report in 7.44 with the statement (leaving out the rest of the above sentence):

'The LVIA concludes that there are no statutory or non-statutory qualitative landscape designations covering the site, and the site is not currently subject to any other designations indicating that development should be restricted as set out in national planning policy (the Framework footnote 9 listed designations).'

I believe this is a misleading statement that indicates contempt with the reality of the site and the value it holds to the local community. The lengthy commissioned LVIA argues a lesser impact from various view points. I feel this is a smoke and mirror strategy. We have already had significant housing developments that have had negative impacts when turned into reality, despite claims to the contrary.

The LVIA draws on tree and hedgerow cover surrounding the site (for example to the north) the retention of such screening to hide the development are outside the control of the developer including private land and unprotected trees. Even if the impact were considered reasonable it would surely require all hedgerows around and on the site be protected and similarly the trees given TPO protection status including those outside the development site. It would also require the heights of new buildings to be relatively low, not least given the elevated position. I requested an outline cross section elevation showing how the potential new builds would sit in height and distance scaled in relation to existing properties on the Rakeway estate which, whilst not compulsory for an outline planning application, this would provide a valuable insight into the visual impact given the 'important landscaping setting to the settlement' status of the site. No such drawings have been produced, instead referring to the LVIA which gives no such relevant information to inform the community and planning committee.

There is clearly visual impact when the document talks about the reduction after a 15 year period. The loss of this land and its amenity is not justified given the damage to the landscape and the visual impact.

2 Historical Environment

Moorlands Historical Environmental Character Assessment (2010) (details in Appendix 4 1.1 CHECZ 1 - East of Cheadle – Marked out on the Map by the HECZ boundary). Considers the area to be an area of greatest sensitivity where the **'evidential, historical, aesthetic and community values are all rated as being high'**. The proposed site is marked over in red on the map below. The explanation for the status is given in the following table extracts:

1.1.2 Heritage values:

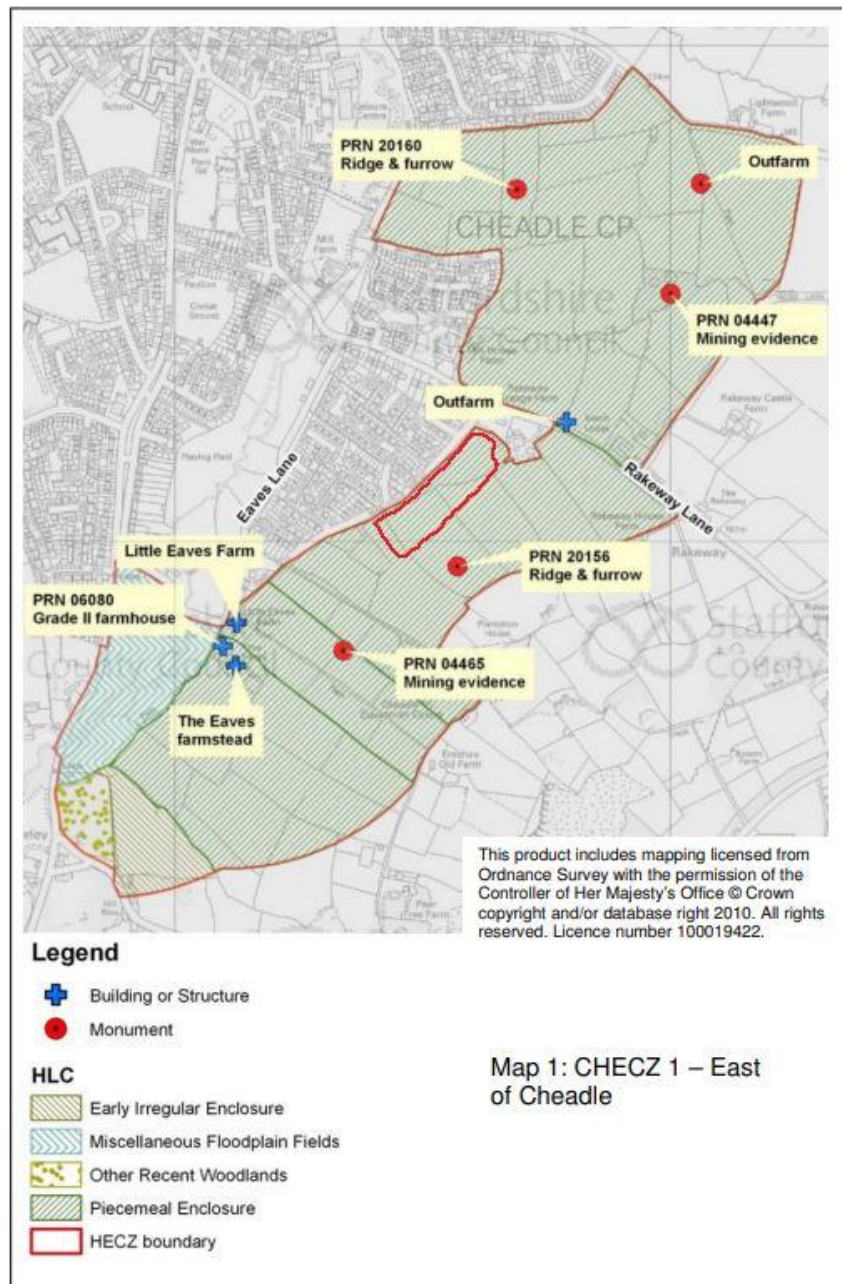
Evidential value: The heritage assets, particularly the survival of the ridge and furrow earthworks and the piecemeal enclosure, form a basis for understanding the economic development of the landscape which is closely associated with the history of Cheadle. The extant historic farmsteads could also retain information which would contribute to the economic history, not only of the landscape of the zone, but of the wider Cheadle area. Further research into the potential for archaeological evidence to survive relating to post medieval or later mining activity would also contribute significantly to the economic history of this area. There also remains the potential for unknown archaeological deposits to survive.	High
Historical value: The well preserved post medieval field system with its mature hedgerows dominates the historic character of the zone. The origins of this landscape are closely associated with the development of Cheadle as a market town from at least the medieval period. The story of landscape and economic change is legible from the surviving ridge and furrow earthworks, indicating its arable origins, to the enclosure pattern and historic farmsteads (particularly The Eaves) which highlight the shift towards stock keeping and dairying within the zone from the post medieval period onwards. The brick built farmhouse at The Eaves has been identified as being of national historical importance in its designation as a Grade II Listed Building. The red brick farmstead of Little Eaves Farm is also indicative of the local vernacular of the wider area.	High

³ Lake 2009: 19

⁴ Staffordshire HER: PRN 0447 and PRN 04465

⁵ Hawkins & Rumble 1976: 1,57 and 11, 42

Aesthetic value: The maturity of the field boundaries are testimony to the antiquity of the enclosure pattern and consequently positively contribute to the aesthetics within the zone and to the views into this landscape. The integrity of the zone is well preserved, with few field boundaries having been removed, and the survival of the earthworks indicating its earlier arable land use. The historical importance of The Eaves to the sense of place is also highlighted by its Listed status and Little Eaves Farm also contributes to the local distinctiveness of the zone.	High
Communal value: The heritage assets and their contribution to the sense of place can be appreciated from the public rights of way which cross the zone. Further research into the associations between the heritage assets and the social and economic history of Cheadle would contribute to the community and public's appreciation of its importance to the history of the Moorlands and Staffordshire as a whole.	High

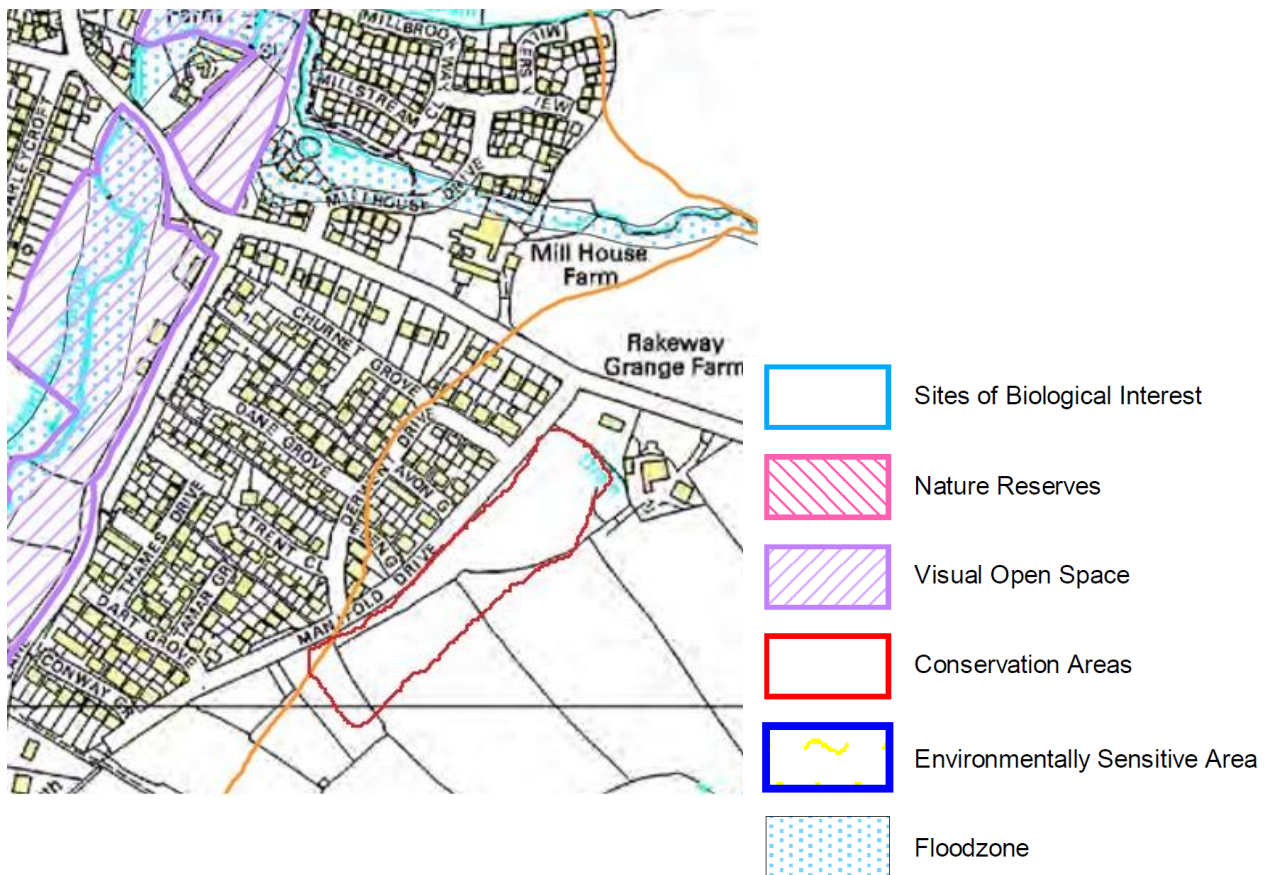


⁶ English Heritage 2010: 26 and 35

The loss of this historically significant land is not justified.

3 Site of Biological Interest

The proposed development sits directly over an area of biological interest with concerns about habitat. The land in the proposal is also current grazing land for cattle.



Apart from the biological value highlighted in documents to the council, this site provides valuable agricultural land and which has a rich bio-diverse wildlife for the benefit of the environment. The loss of this land and site of biological and agricultural value is not justified.

4 Road Traffic and Infra-structure

Traffic flows are a significant concern for residents for a number of reasons when brought together.

- a) The Amey Traffic report commissioned in 2017 (COSTCDT6573 / Rep 002 Final) identified that the Cheadle road traffic network had largely reached running capacity at key points.
The report shows (Appendix E.1) that 33% of the journeys are commutes to the Stoke on Trent Area.
Since that report was produced a net increase of 430 properties have already been built to 2024 since 2017 (ref SMDC annual monitoring report below).

Authority Monitoring Report 2023-24

Area	2014/ 15	2015/ 16	2016/ 17	2017/ 18	2018/ 19	2019/ 20	2020/ 21	2021/ 22	2022/ 23	2023/ 24	Total
Leek											
Allocations	2	1	0	1	0	3	10	2	0	0	511
Windfalls (large)	139	24	42	17	1	50	42	19	20	6	
Windfalls (small)	8	4	2	22	13	32	27	8	3	13	
Biddulph											
Allocations	0	0	0	0	0	0	0	0	0	0	235
Windfalls (large)	44	27	39	16	0	16	14	0	0	0	
Windfalls (small)	16	1	1	17	6	2	1	11	4	20	
Cheadle											
Allocations	0	0	0	0	0	0	0	11	83	60	488
Windfalls (large)	0	0	0	0	76	3	25	42	37	20	
Windfalls (small)	31	10	4	13	11	19	16	4	8	15	
Rural Area											
Allocations	0	0	0	0	7	0	33	41	60	47	633
Windfalls (large)	16	17	24	19	0	11	0	0	4	6	
Windfalls (small)	22	15	16	30	51	67	33	39	23	53	

Table 6.2 Details of residential completions (net) on allocated sites and windfall sites

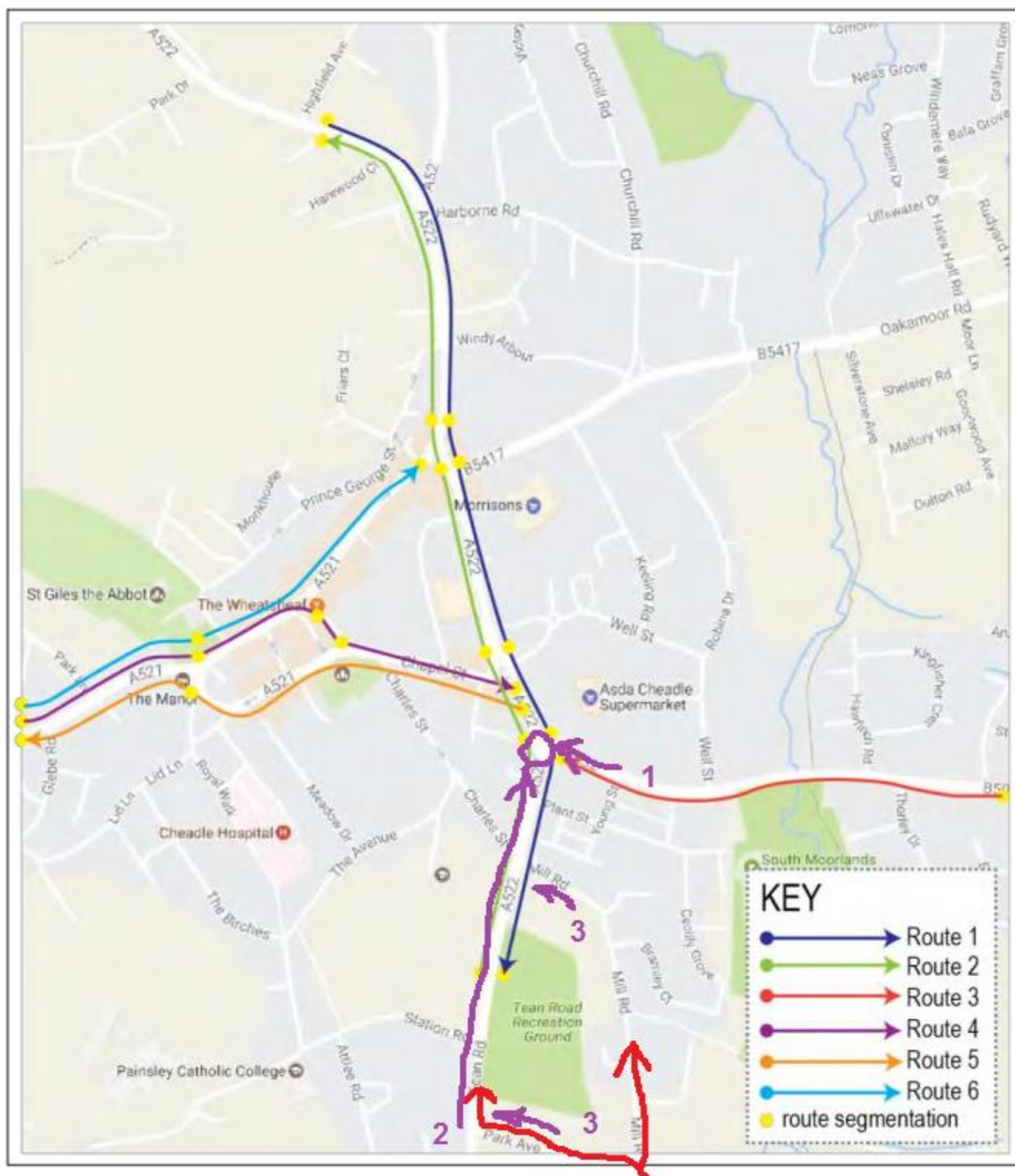
- b) The Standard Method of Objectively Assessed Housing Needs for the Staffordshire Moorlands that fed into the adopted local plan 2020 identified a requirement for 159 dwellings per annum (based on ONS population and affordability metrics). This figure was increased to 320 dwellings per annum on the argument that the area has an ageing working population and needs a net migration (despite nearly 6000 written objections to the level of proposed housing) apparently to meet the working needs of the area.

Taking the 2020 Local plan on face value with Cheadle presented as a service town alongside having identified that a very significant percentage of residents (33%) commute to Stoke-on-Trent and the Potteries for employment the road infra structure plays a very significant role in the viability of the town to fulfil the claimed objectives of the local plan and for transport mobility in and around Cheadle. The following map (taken from the Amey transport study) details the key flows through the very limited road infrastructure of Cheadle namely the A522, A521 and B5032. The overlaid red arrows marked at the bottom of the map have been added to detail the primary routes for residents from the existing Millbrook and Rakeway estates to travel through the town to the North (Stoke-on-Trent and the Potteries) and the West (Blythe Bridge and beyond). This will also be the primary route from the proposed development of 50 dwellings (potentially 50 to 100 additional vehicles).

Additional new builds off the B5032 Ashbourne road (Augustus Way & Mercian Way Development) have already increased westbound traffic onto the Tape Street Roundabout at busy times with a now regular build-up of traffic along Ashbourne Road (B5039) as marked below by the purple line 1.

Consequently traffic is now regularly building along the A522 (Teian Road) marked below by the purple line 2 as it has to give way to an increased traffic flow from the B5032. I can state from personal experience that whereby free flow access onto the A522 could historically be achieved from Mill Road going northbound it is now regularly only

possible to do so by joining the A522 via Park Avenue. Traffic is now starting to back up on the A522 beyond that junction especially at commute times making it increasingly difficult to Join from Park Avenue. The addition of up to 50 to 100 new vehicles using this primary route is likely to introduce very significant delays because vehicles are going to start backing up along Park Avenue and Mill Road (marked as 3). The queue backing up along the A522 (Tea road, purple line 2) is already significant (adding minutes extra per journey) , just 1 or 2 cars in front of you on Park Avenue can add a very significant delay trying to join the traffic queue on the A522.



The road infrastructure is in my opinion not capable of taking additional traffic without unacceptable travel time delays and works against the very arguments for increased housing provision detailed in the local plan.

Highways issues have already been flagged by residents regarding SMD/2020/0502 and the Augustus Way development (feeding into purple line 1 marked on the map). In commenting on that application;

The highways agency highlighted that the developer lead traffic assessment only detailed incremental traffic impacts and did not cover the impact on the existing road system.

It was highlighted by residents that any development that has significant potential impact:

'stands against Section 110 d) of the National Planning Policy Framework 2021 V3 because it is necessary in considering development proposals to "ensure that: d) any significant impacts from the development on the transport network (in terms of capacity and congestion, or on highway safety can be cost effectively mitigated to an acceptable degree."

Section 106 funding was secured to improve the A522(Tape Street) mini-roundabout traffic with a flow lane but as was highlighted at the time improvement options were not likely viable. The only change made was minimal repainting of the road at the time and which made no improvement to the rising road traffic congestion issues.

A Transport Statement made by SCP on behalf of the new proposed Manifold Drive development (and which in effect holds practically no responsibility), references a study based on a Froghall development which is sited north of Cheadle and hence, does not include the significant delays to and from Cheadle especially when travelling to the main neighbouring employment area of the Potteries. It also draws from information produced in July 2022 on the tail end of the return to work post Covid.

The national government "all motor vehicles" traffic index details a 5% base increase in traffic since June 2022.

Section 5.17 of the SCP Transport Statement details no significant impact turning right onto Tean Road from Park Avenue. This is increasingly not the case at busy AM and PM periods. The SCP report asserts a low figure of 18 vehicles will departure from the proposed development at peak times. (section 5.2) . Even 2 cars that cannot turn onto congested Tean Road can add a significant delay with traffic backing up on Park Avenue.

Further referring to traffic congestion on the roundabout (marked as the purple ring above) in **a prediction to 2033**, SCP clearly state on page 22:

'5.25 With the additional traffic generated by the proposed development, the RFC values and queue lengths are predicted to increase only marginally.

This comment is clearly a repeat of the minimal incremental impact argument made by previous developers (already highlighted in bold above). However the developer commissioned report does include a statement over predictions for the A522 (Tape Street) mini-roundabout:

'5.24 The above table demonstrates that the A522 / Ashbourne Road priority mini-roundabout is forecast to operate over capacity in both the AM and PM peak hours even without the development in place.'

Ignoring the Covid period and gradual return to work, the roundabout already reaches AM and PM capacity in 2025 not 2033 as is blatantly apparent to residents of Cheadle. The implicit statement that the additional housing won't make a significant difference because it is already congested is abhorrent.

Further the SCP Transport Statement end paragraph of 5.25 states:

'It should also be noted that when a junction is already forecast at capacity, any increase in traffic results in an exponential increase in queues.'

Apart from highlighting how quickly the roads can in effect bottle neck and jam completely, it is clearly stated in a way that would be used as an argument to mitigate any responsibility claim should the development go ahead and it have any significant impact. I have highlighted one likely impact based on the reality of living in Cheadle and not based on a paper exercise. I understand numerous assessments have already been made for various road improvements for transport flow (bypasses etc) and believe they have all been considered unviable based on the cost to the public purse. In that context I believe it should considered unacceptable to allow the proposed development under national planning policy due to the impact on the Cheadle Road Infrastructure.

Further the SCP study identifies cycling as a viable transport method but does not take into account the lack of cycle lanes and significant heavy traffic that flows from the local JCB site which make general cycling unsafe along the A522. It talks about being well placed to encourage bus travel but does not address the lack of existing bus routes to viable employment options for example in the Potteries or Stafford. The 123 bus service goes no way to address this. The 60 minute accessibility commute times are not likely based on future predictions are based from froghall and are in effect continuously shrinking with no road improvements and significant housing building.

5 Flooding Issues

Residents on the Rakeway Estate have substantial video and photographic evidence of significant runoff water and flooding issues on the Rakeway estate. There is already significant concern that climate change has increased rainfall such that what were once one in a hundred year events are happening regularly across the UK.

The Flood Risk Assessment report 14911-FRA produced by Waterco for the developers identifies no such flooding history or risk which is of great concern, as is the validity period of the report of only 12 months. Flooding has already been highlighted via community feedback.

The flooding report assumes a limited discharge into the existing sewer drainage with a limited SuDS system to limit the peak rainfall demand. I am no expert but in layman's terms the report appears to make no reference to runoff water from higher ground surrounding the site. Further, I cannot see any document detailing the Manhole covers and drainage options detailed in the Flood Risk assessment to determine their function or flow path.

The proposed development site sits on land in front of a significant 70 metre rise (165m to 235m) in the land heading up towards Freehay (See image below). Residents with local experience are well aware that run-off water from the higher grounds is substantially absorbed by the proposed development site land when there is heavy rain. In effect residents I have spoke to, believe, the whole of that site works as part of a Sustainable Drainage system for the higher ground above the proposed development site, releasing rainfall water in all downward directions over time and providing some level of protection to the existing Rakeway estate. When it rains heavily there is significant water flow down Rakeway road and through the Rakeway Estate Roads (Churnet Grove, Dane Grove and Conway Grove etc).



Residents are not convinced that the SuDS scheme would handle both the runoff falling on the proposed houses and also the flow through from the higher ground or that it would in fact replace the current existing water retention capacity and runoff function that the land currently provides. We therefore question that the Waterco report satisfies a suitable strategy.

I cannot see any comments from SCC regarding the Flood Risk Assessment.

There are also concerns about SuDS schemes and it not being properly designed, effective and properly and regularly maintained (monthly) as is assumed in the flood risk document.

I believe the drainage scheme carries risks to the existing Rakeway estate and the proposed SuDS scheme may have significant short falls. Development on this site is not justified.

6 Not Justified

As has been detailed the Housing Targets of 320 dwellings per annum set in the current Local Plan 2020 which runs through to 2033, were an aspiration on the part of the Staffordshire Moorlands District Council to meet a projected shortfall in the working age population and as such are not a statutory (legal) requirement. The Statutory Requirement is the Baseline Objectively assessed housing needs (ONS population projections with an affordability adjustment), the point at which tilted balance arguments in favour of otherwise inappropriate developments might apply. This figure is 159 dwellings per annum for the Staffordshire Moorlands, a number which the area exceeds under the adopted Local Plan.

The latest 2024 Government target of a provision for 0.8% of existing housing stock which might apply in the absence of a local plan is likely to face challenge where such figures impose targets that are not clearly justified by genuine local housing demand not least as it will impact on communities the environment and sustainability.

It is not appropriate to use a leverage argument to tip a balance in favour of development for sites where there are clearly undesirable reasons for development especially when the argued figures sit above those of genuine local need (Baseline Objectively assessed housing need). Even when a tilt in balance applies it is still not justified for this application given the all the reasons stated above.

Greg Powell
62 Rakeway Road,
ST10 1QH.
16th June 2025