

## GREATER MANCHESTER SPATIAL FRAMEWORK

### RESPONSE ON BEHALF OF WOODFORD NEIGHBOURHOOD FORUM

#### 1. Introduction

Woodford Neighbourhood Forum arose as a result of an initiative by Woodford Community Council and was approved by Stockport Metropolitan Borough Council in 2013. The basic purpose of the Forum is to promote and improve the social, economic and environmental well-being of the Neighbourhood Area. The preparation of a Neighbourhood Plan is a key part of fulfilling this purpose and volunteers on the Management Committee have expended considerable amounts of time and energy working towards this goal. As a result of professional and volunteer studies and ongoing consultation with residents, we have a significant library of information and evidence about the history, heritage, landscape, environment, housing needs, roads, footpaths and businesses of Woodford and about residents' aspirations for the future of the village.

The residents' vision for the future of Woodford is:

"To manage and support beneficial change whilst retaining and enhancing Woodford's rural identity, character, quality of life and sense of community."

In the context of GMSF, it is important to note that key objectives requested by residents include:

Environment: "To protect the area's Green Belt, preserve the open, rural character and protect the landscape and important views."

Housing and Development: "To provide variety and mix that meets local needs and manage limited infilling, including residential, employment and community uses."

Employment: "Seek to protect and support local employment."

Movement: "To create safer roads, streets and lanes and increase public access to countryside by foot, cycle and bridleway and to encourage sustainable transport."

Community: "To preserve and enhance recreational assets and open space to promote a healthy community."

Sustainability: "To encourage building and lifestyles in Woodford which minimise damage to the environment for current and future generations."

We have a mandate from residents to achieve these goals. GMSF is in stark contrast to the aspirations of local people in many respects and we make the following comments on GMSF on their behalf.



**Agricultural land with public right of way near Church Lane in Woodford, which is allocated for development in GMSF**



**Agricultural land with public right of way near Chester Road in Woodford, which is allocated for development in GMSF**

## 2. Summary

Woodford Neighbourhood Forum welcomes the preparation of a Local Plan and supports the aim of the Greater Manchester Combined Authority to enhance economic performance and improve the environment. However, the draft GMSF is not the right plan for the rate paying residents and is flawed in many respects as follows:

- GMSF aspires to growth which goes beyond meeting needs, with negative consequences which will affect the health, happiness and productivity of current and future generations. These consequences will be counter to its stated aims and the NPPF.
- In proposing release of Green Belt land to meet housing needs GMSF is counter to the NPPG, and all the more so because it goes above and beyond meeting needs. This does not constitute the required exceptional circumstances for Green Belt release.
- Councils' brownfield site registers are not up to date. Therefore, the quantity of brownfield sites available for development is unknown. They must be brought up to date and every effort should be made to utilise the sites before any Green Belt is released for development.
- GMSF should provide an opportunity to regenerate town centres, such as Stockport providing accommodation and employment in a sustainable location. By allowing Green Belt release and an easier route for developers, the GMSF fails to address this opportunity and is counter to its own policy GM1.
- GMSF fails in the duty to co-operate with neighbouring authorities.
- GMSF proposals rely on predictions of population and economic growth which are unsound.
- It has not been democratically prepared: residents and their elected representatives have been largely unaware of the proposals until very recently. There should be full council member consultation on the next version of the GMSF before it is made public.
- Developers, who have a strong vested financial interest in growth, appear to have been too influential in the early stages of plan preparation and in previous rounds of consultation. This conflict of interest should be taken into account during further plan development.
- The outcry of protest from many thousands of residents across the Greater Manchester region demonstrates that this is not the plan that the rate payers want.
- The proposals contradict the GMSF's own strategy in para 2.5 of minimising environmental impacts and reducing the need to travel.
- The draft GMSF is not sustainable because it would destroy green areas which absorb carbon from the atmosphere, provide habitats for wildlife and are part of our beautiful British countryside heritage, which we should pass on to future generations. It would encourage car travel, increasing traffic congestion and air pollution and is counter to its own policies GM15 and GM17.
- The plan is undeliverable because it will not be possible to mitigate in any reasonable timescale the increase in traffic due to the increase in population in locations where the road infrastructure is already congested and where there is no easy access to public transport.
- The draft GMSF is also unsustainable because the Woodford, Cheadle Hulme, Cheadle Heath and Bramhall areas currently have virtually full employment levels, so new residents would have to travel out of the area to work, adding to road congestion and pollution.
- With specific reference to Woodford OA20, Woodford Neighbourhood Forum has assembled a large library of information and evidence to support its emerging Neighbourhood Plan. This evidence supports the following points. The draft GMSF is:

- Unjustified and unsound because the Green Belt here fulfils the five main purposes outlined in NPPF para 80 and exceptional circumstances have not been met to justify release.
- Unsound because it proposes release of 34% of land in Woodford Neighbourhood Area from Green Belt, leaving a narrow strip of Green Belt around this area, which does not fulfil the purposes of Green Belt.
- Unsound because it goes way beyond meeting the predicted housing needs of the local area.
- Unsustainable because it would disrupt farm businesses which contribute to the economy.
- Unsustainable because it would disrupt and destroy wildlife habitats and corridors.
- Unsustainable because there is no easy access to public transport, forcing more traffic on to very congested roads.
- Undeliverable because much of the area is unsuitable for development due to geological features, flooding and tipping.
- Undeliverable because it would not be feasible to provide the necessary improvements in road infrastructure to support such a huge increase in the population in this location.

These points are explained in more detail below.

### **3. The overall vision is not justified**

The GMSF proposals represent aspirations for growth and go beyond meeting predicted needs. This is stated in the draft GMSF para 1.19: “[The vision builds on the Greater Manchester Strategy and sets out how Greater Manchester is planning to meet levels of growth well above baseline forecasts.](#)”

The paper on the Accelerated Growth Scenario by Oxford Economics notes that, compared with baseline forecasts, it will result in 53,100 more jobs, 59,700 increase in population growth and an increase in net-commuting into Greater Manchester, which is estimated to be higher by 1,000 per year by 2035.

The Objectively Assessed Housing Need Nov 2015 concludes that 217,350 new dwellings will be needed over the period 2014-2035. It notes that this is high and questions whether it is realistic or desirable. And yet the GMSF proposes even higher levels of 227,000.

We are not aware of any evidence that increasing urban scale increases productivity and economic performance.

The draft GMSF is counter to the NPPG, which states that housing need is unlikely to constitute exceptional circumstances for Green Belt release. Expansion over and above predicted need is even less justified, surely.

#### **4. The economic and population predictions are not accurate**

The Office of National Statistics and DCLG take great care to point out that predictions for population growth should be treated with caution and not be taken as fact. These not-necessarily-reliable numbers have been fed into POPgroup software, which also provides a warning that the predictions give a guide and are not to be taken as fact, compounding the level of inaccuracy. Thus, very unreliable predictions are now being used as facts. In the parliamentary debate on 14 December 2016, William Wragg MP noted that taking the three most recent forecasts from the ONS (from 2008, 2010 and 2012) there is a variance of almost 200,000 people between the highest and lowest estimated for the population of Greater Manchester by 2030. This means that the number predictions are two thirds within the margin of error of the ONS forecasts.

The ARUP scoping report, on page 23, states that population growth in Stockport from 2003 to 2013 was 1,532 (0.5%) in total, which equates to an average of 0.05% per annum. On page 24 of this report, it is predicted that population growth from 2013 to 2037 will be 30,000 (9.6%) in total, which equates to an average of 0.4% per annum. This predicted figure is many times higher than the actual figure for the previous ten years. Predictions for other boroughs in Greater Manchester do not show this enormous predicted increase the rate of population growth. In addition, the report notes that Stockport has the highest proportion of people who are 65 and above and the lowest proportion of 16 to 64 year olds, compared with any other borough in Greater Manchester. Therefore, this highly inflated population growth prediction for Stockport seems highly unlikely. One wonders whether an error has been introduced here.

The plan is not sound and release of Green Belt is not justified with such a variance in the predictions.

#### **5. Brownfield sites should be fully utilised before Green Belt is used**

It is imperative that all the Greater Manchester councils have up to date brownfield site registers which have been thoroughly reviewed for future development. We know, for example, that SMBC's is not up to date. How on earth can decisions be made to destroy swathes of countryside for ever by releasing Green Belt for development before every possible effort is made to accommodate the required development elsewhere?

These proposals must not go ahead until a detailed review of brownfield sites has been prepared by each Council.

Green Belt must only be released for development piecemeal, Council by Council, area by area, once all other avenues for development have been exhausted.

GMSF should provide an opportunity to regenerate town centres, such as Stockport (one of the purposes of Green Belt), providing accommodation in sustainable locations. By allowing Green Belt release and an easier route for developers, the GMSF fails to address this opportunity.

#### **6. Duty to Co-operate has not been effectively implemented**

We do not believe that there has been effective implementation of the Duty to Co-operate between the Association of Greater Manchester Authorities (AGMA), Cheshire East Council (CEC)

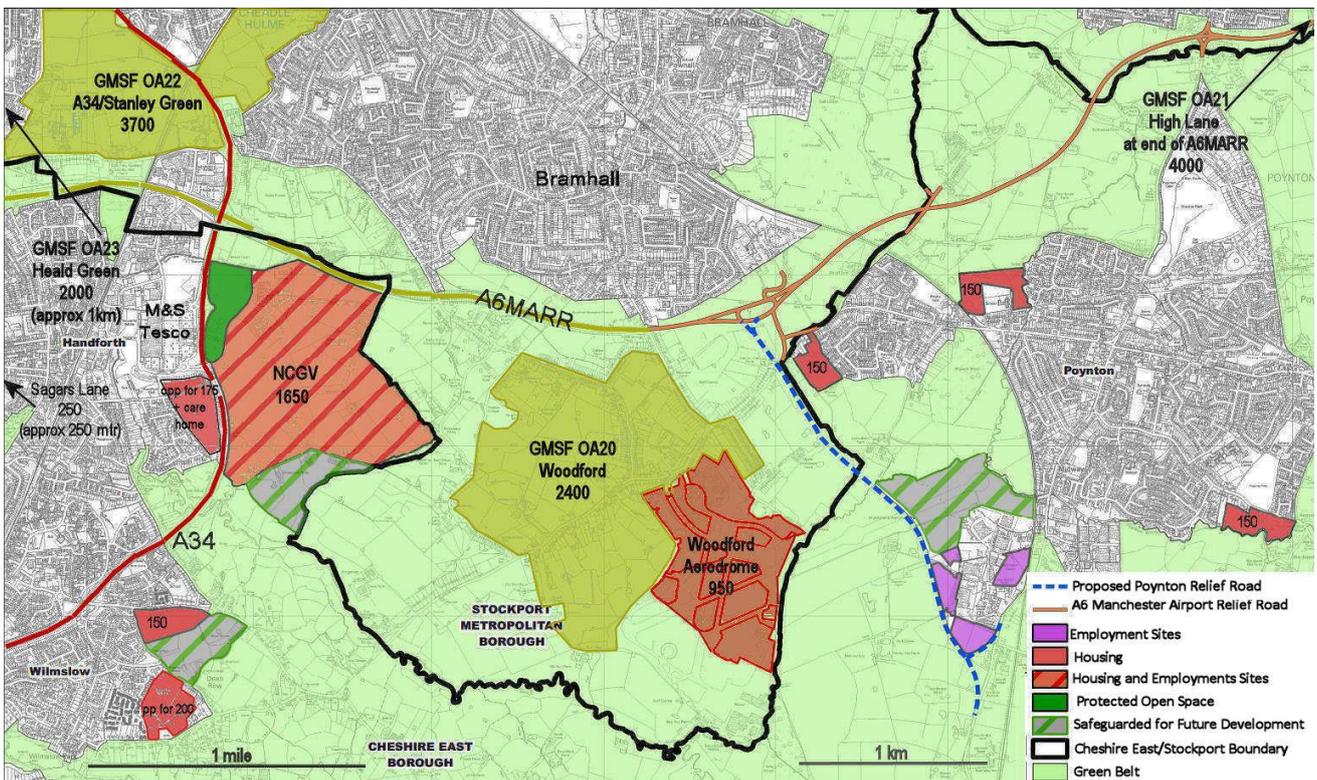
and other neighbouring authorities in the preparation of the GMSF proposals, with particular regard to joint monitoring of housing markets, the cumulative loss of Green Belt land and the delivery of the required road infrastructure to support new development proposals. This is illustrated by the cumulative effects in points 7 and 8 below.

It is of paramount importance that Councils work closely and openly with each other throughout this process, particularly as these proposals have such a huge effect on the whole of the area, as required by the NPPF in paragraphs 54, 178 and 182.

**7. Removal of land from Green Belt by both Greater Manchester and Cheshire East Councils**

The cumulative impact of Green Belt loss in Cheshire East and Greater Manchester, which would be the result of the proposals in the CEC Local Plan and GMSF, will have a dramatic effect on the Green Belt in South Manchester. This is illustrated by the cumulative impact map below.

**Cumulative impact of GMSF proposals in addition to developments proposed in Cheshire East Local Plan, plus developments in Stockport.**



The CEC Local Plan, which is proceeding to final report following a public examination before the inspector gives his final verdict, proposes substantial Green Belt release, including 105 ha immediately adjacent to Woodford for the development of 1,650 new houses plus commercial premises in the North Cheshire Growth Village (site ref. CS30). The site currently performs the highest levels of the function of Green Belt as outlined in the NPPF paras 79-81 (ref. ARUP Green Belt Assessment on behalf of CEC).

The CEC Local Plan proposes removal of a further two sites from Green Belt in close proximity to Woodford, for development of 150 dwellings on 4 ha of land south of Chester Road in Poynton (site ref CS59) and for 150 dwellings on land at Heathfield Farm Dean Row, Wilmslow (site ref CS62).

In addition, the CEC Local Plan proposes the safeguarding of Green Belt land for future development, including 14 ha adjacent to the NCGV in Handforth (site ref CS34), plus 9 ha at Heathfield Farm Wilmslow (CS63), plus 22 ha at Woodford Aerodrome (site ref. CS65).

All this is on top of planning permission granted by SMBC for 145 dwellings in Phase 1 and outline planning permission for a further 775 dwellings plus a care home and commercial premises at the Woodford Aerodrome site, which is previously developed land in Green Belt.

And now GMSF proposes releasing further Green Belt land in the same locality including:

- 238 ha at Woodford (ref. 0A20) to accommodate a further 2,400 homes
- Land at Cheadle Hulme to accommodate 3,700 dwellings (ref. 0A22 land off A34)
- Land at Heald Green to make room for 2,000 dwellings (ref. 0A23)

The cumulative impact of these developments would be the removal of Green Belt between settlements in Stockport and settlements in Cheshire East and the sprawling of the conurbation of Greater Manchester into Cheshire, as can be clearly seen on the map above. This would be contrary to the NPPF and GMSF's own policy aims in GM13. It indicates a lack of co-operation and co-ordination between adjoining planning authorities.

The Inspector, Stephen Pratt, who conducted the examination of the CEC Local Plan, noted in his interim comments in 2014 that there were concerns about the principle of releasing Green Belt at Handforth East and about the cross-boundary implications and infrastructure requirements of this development.

### **8. Delivery of road infrastructure**

The SEMMMS A6 – Manchester Airport Relief Road (A6MARR) has not been designed to accommodate the impact of the proposals in the Cheshire East Local Plan, or the GMSF proposals. Either of these plans alone would rapidly remove the intended “relief” to current traffic congestion. Together they present significant challenges, proposing a total of 16,000 extra dwellings plus additional commercial premises within 2 miles of A6MARR.

Similar problems would arise for the A34 bypass, which is already highly congested at peak times.

Representations made by SMBC to CEC point out the traffic problems that the CEC Local Plan (particularly with respect to the North Cheshire Growth Village) would create for road infrastructure. In a similar vein, representations made by CEC to AGMA point out the traffic problems that the GMSF proposals would create for road infrastructure. Unless these concerns are comprehensively addressed and plans put forward to alleviate the situation the GMSF proposals should not go ahead. Hoping to create plans once approval has been given is illogical and a recipe for disaster.

## 9. The process has not been democratic

We have seen no evidence that the majority of residents of Great Manchester wish to see growth over and above baseline needs at the expense of Green Belt and with all the other negative impacts associated with higher population density. The process so far has been counter to NPPF para 69 : “local planning authorities should aim to involve all sections of the community in the development of Local Plans and in planning decisions.”

Furthermore, the out-pouring of protest in regions where proposed allocations would take large areas of land out of Green Belt, including Heald Green, High Lane, and Woodford in Stockport and groups in Wigan, Salford, Rochdale, Oldham and Tameside, provide strong evidence that large numbers of residents object strongly to these proposals.

We believe that developers, who have a strong vested financial interest in growth, have been too influential in the early stages of plan preparation and in previous rounds of consultation. For example, for the options consultation in the autumn of 2015, three options were prepared. Option 1 prepared for the lowest growth, option 2 prepared for a higher level. Option 3, which included a very high level of housing (over 300,000), was put forward by the Housing the Powerhouse group of developers. In the consultation, the question asked which option do you **favour**? The results reveal a very low response rate. Out of a population of 2.7 million in Greater Manchester only 60 responses were received and only 51 of these expressed a preference. Of these, 33 (65%) were developers or their agents, all of whom chose growth options 2 or 3. Just 3 (6%) were residents who all chose option 1. This is misreported in the current GMSF documents as: “the vast majority of responses were **against** option 1”.

We can safely say that the vast majority of the population of Greater Manchester have not been involved in these proposals which will have the most dramatic effect on the area experienced in the last 50 years. Indeed the elected councillors were not aware of the detail until the proposals were published in October. That cannot be democratic!

## 10. The proposals conflict with GMSF’s own strategy

Woodford Neighbourhood Forum supports some aspects of the strategy and many of the policies outlined in GMSF, but finds that the proposed allocations contradict some of these laudable aims. Some of these are noted under the appropriate sections. As an example of one of these contradictions, paragraph 2.5 of the GMSF Vision and Strategy states: "There will be a very strong emphasis on directing new development towards locations that support urban regeneration, minimise environmental impacts, reduce the need to travel, and are/or can be made most accessible by public transport, cycling and walking. Development will be managed to ensure that it is both functional and architecturally inspiring and makes a positive contribution to the quality of places and the wellbeing of people securing the reuse of brownfield land, protecting open spaces within the urban area, and delivering genuinely sustainable neighbourhoods with supporting facilities and services."

However, the SMBC Green Belt allocation does not support this strategy. It does not support urban regeneration, does not minimise environmental impacts and does not reduce the need to travel, in fact

it encourages it. It does not provide a positive contribution to the quality of places and the wellbeing of people, or secure the reuse of brownfield land, protect open spaces or deliver a genuinely sustainable neighbourhood. In fact, all of the strategic allocations identify a portfolio of high quality housing sites that are outside the existing urban area, thereby going against the stated strategy.

### **11. The draft GMSF is not sustainable**

The draft GMSF para 1.19 states that: “The GMSF supports long term prosperity as well as meeting short term needs and seeks to ensure that all places and all residents share in the benefits of growth at the same time as building a resilient Greater Manchester, improving our green infrastructure network, reducing carbon emissions, addressing air quality and reducing flood risk.”

Contrary to this laudable aim, the plan seeks to replace large areas of Green Belt with urban development. Green Belt performs an important function as the green lungs (green plants maintain an environment suitable for human life by absorbing carbon dioxide and producing oxygen), it improves human physical and mental health and contributes to the economy via agricultural and horticulture. The benefits of the English countryside should be passed on to future generations. By allocating sites in rural locations, with low job opportunities, which are inaccessible to public transport, the plan contributes to traffic congestion, air pollution (already above recommended levels in some areas), and greenhouse gas emissions. This is not sustainable development and is counter to GMSF para 2.9.

In aiming to meet the OAN for Stockport by the use of Green Belt, the GMSF would be undertaking unsustainable development and be in contravention of NPPF para 84.

GMSF policy GM5 begins to suggest a more appropriate solution, exploring opportunities to increase density close to local centres and public transport stops, with density tailored to relative accessibility of the site by walking, cycling and public transport, enabling more people to live in the most accessible locations

### **12. The draft GMSF is not deliverable**

The infrastructure required to support such a massive growth programme could not be provided in a reasonable timescale in order to avoid negative impacts. In the case of road infrastructure it seems unlikely that the required mitigation and relief could be provided at all in already built up areas without large scale demolition programmes and destruction of further tracts of countryside.

Points specific to deliverability of Woodford OA20 are covered in the section below.

### **13. Points specific to Woodford OA20**

Woodford Neighbourhood Forum has assembled a large library of information and evidence to support its emerging Neighbourhood Plan. This evidence supports the following points. The allocation of Woodford OA20 in the draft GMSF is:

### 13.1 Unjustified and unsound

- The Green Belt here fulfils the five main purposes outlined in NPPG para 80 and exceptional circumstances have not been met to justify its release. It prevents urban sprawl and coalescence of neighbouring towns, including Bramhall, Cheadle Hulme, Poynton, Wilmslow, and Handforth, protecting the character of these historic settlements. The proposals are counter to GMSF's own policies, including GM13.
- GMSF proposes release of 34% of Green Belt land in Woodford Neighbourhood Area from Green Belt. It proposes leaving a narrow strip of Green Belt around this area, which is only 240 metres wide where Woodford adjoins the proposed North Cheshire Growth Village in the CEC Local Plan and only 160 metres wide at the North Eastern end where Woodford adjoins housing in Bramhall. Such a narrow band does not fulfil the purposes of Green Belt and the resulting island of development in the middle of Woodford would be an anomaly.  
(Note: this calculation based on the area of 153 ha for Woodford OA20 quoted in Flood Risk and Water Management Evidence Paper, not 238 ha incorrectly quoted in the draft GMSF. Woodford Neighbourhood Area is 458 ha).
- Most importantly, the Green Belt is a very precious resource for the wider community. People from far and wide come here to walk, jog, cycle and ride horses. With uninterrupted views over the Pennines from the lanes and footpaths and seasonal floods attracting rare birds, it is a favourite spot for photographers and birdwatchers. There is a lot of evidence now for the physical and mental benefits of exercise in green places. It should be retained for the benefit of the wider community.
- Woodford is not listed in GMSF supporting documents as an historic settlement, although a settlement here dates back to the 13<sup>th</sup> Century and it is marked on the Ordnance Survey map dated 1897. Several cottages and listed buildings in Woodford date back several hundred years, including Old Hall Farm which was known to be here in 1370.
- GMSF goes way beyond meeting the predicted housing needs of the local area. A housing needs assessment by AECOM commissioned by the Neighbourhood Forum to provide information for the Neighbourhood Plan concluded that the housing needs for Woodford up to 2026 is 20-25 dwellings, which could be provided by the development on the aerodrome site. The report can be found on our website: <http://woodfordnf.co.uk/wp-content/uploads/2015/10/AECOM-Woodford-Housing-Policy-Advice-2015.pdf>
- In responses to a questionnaire in 2014, residents emphasised their wish to preserve the Green Belt, views, open spaces and rural feel of Woodford. Over 90% of respondents cited the rural location as one of the good things about Woodford and over 60% said it was their reason for choosing to live here. With regard to new housing, nearly 70% of respondents opted for no more than 50 dwellings (the lowest option presented) and narrative responses indicated that residents considered that the Aerodrome development was more than sufficient new dwellings in the plan period, though lacking in smaller, inexpensive options. We have a responsibility to

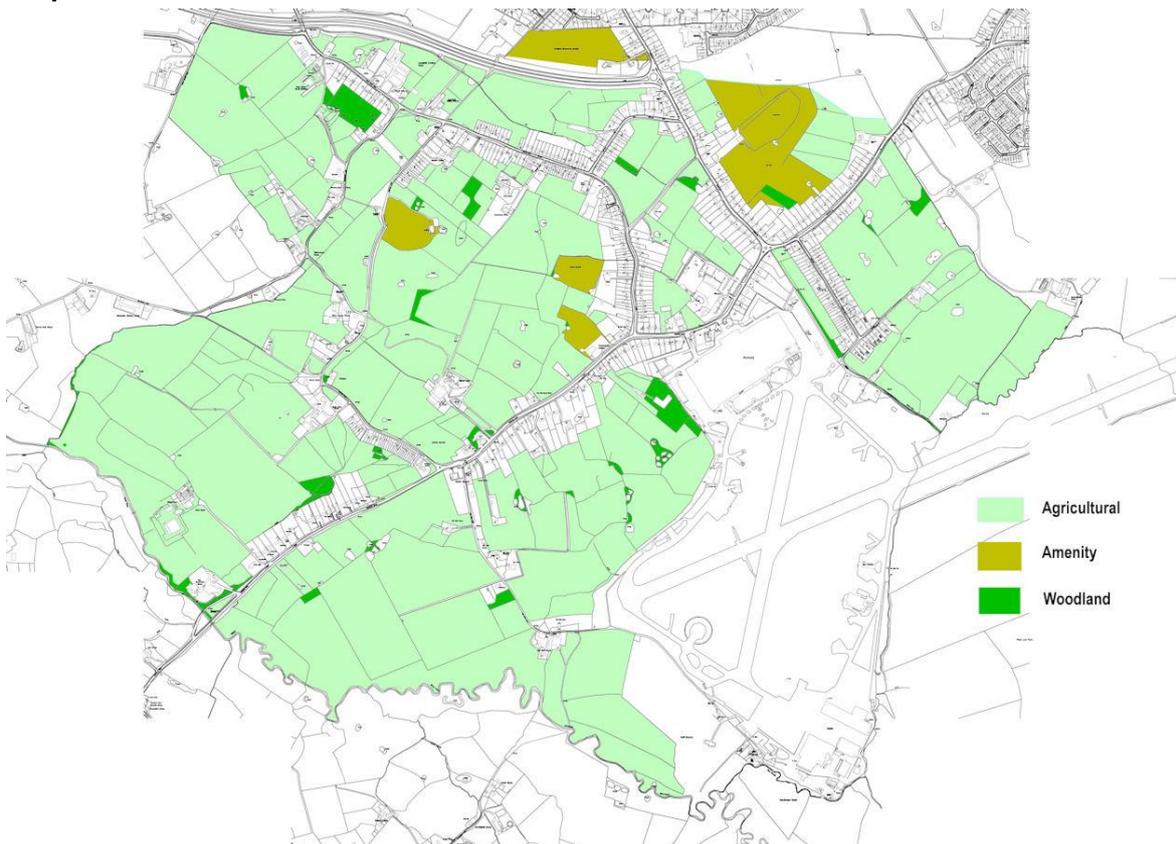
argue the case on behalf of residents who chose to live here because of those features and responses.

- A Heritage and Character Assessment of Woodford carried out by AECOM in August 2016 on behalf of Woodford Neighbourhood Forum concludes that unsympathetic development could result in reduction in openness, and loss of historic features or mature vegetation. In the appendix, it includes maps showing special features to be protected, including views and countryside gaps. It can be viewed on our website: <http://woodfordnf.co.uk/wp-content/uploads/2016/08/NP-Woodford-HCA-FINAL-LR-160815.pdf>

### 13.2 Unsustainable

- It would disrupt farmland which contributes to the economy. Woodford is 78% open green fields (very largely farmland with a small amount of amenity land) and 22% built environment (buildings and roads). Agriculture, horticulture and equestrian businesses are important parts of the life style in Woodford, contributing to the food supply and providing employment.

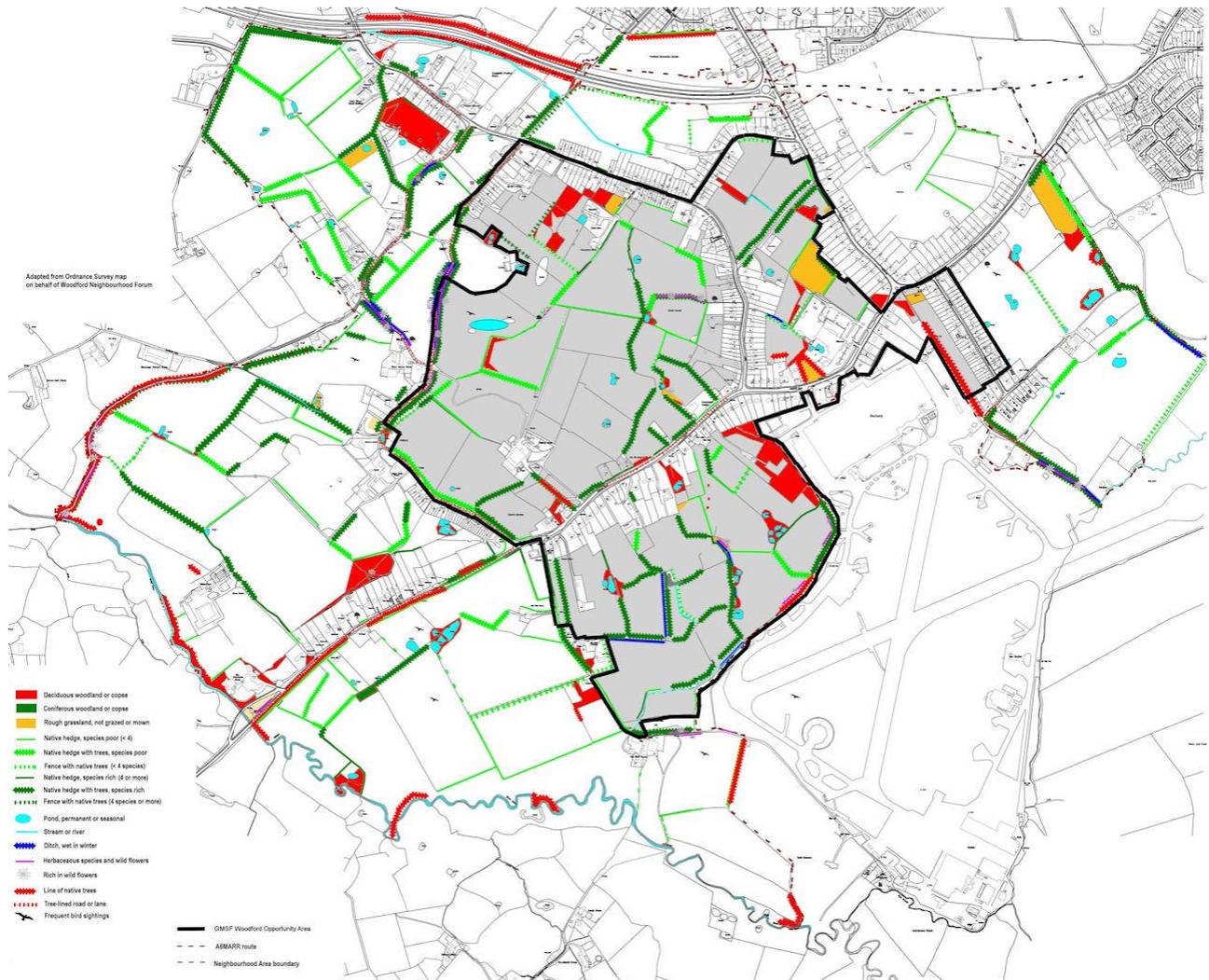
#### Map of land use in Woodford



- It would disrupt and destroy wildlife habitats and corridors (see map below) and is counter to GMSF’s own policies GM7 and GM8. Woodford Neighbourhood Forum has undertaken extensive and detailed surveys of the landscape, environment and habitats for wildlife here. The area was once part of the royal hunting forest and was later cleared for agriculture. Evidence of this history can be seen in the large number of mature native trees, particularly oaks, and species rich hedgerows, many of which will be in the age range 200-400 years old. Woodford is flat, low lying and wet with a large number of ponds and ditches. All these natural

features provided excellent habitats and corridors for wildlife. The volunteer studies will be supplemented by a report by Cheshire Wildlife Trust which is due to be completed early in 2017. The results can be viewed on our website: <http://woodfordnf.co.uk/neighbourhood-plan/landscape-and-environment/>

**Key natural features in Woodford with area which would be affected by GMSF shown in grey**



A higher resolution version of the natural features map is on our website:

<http://woodfordnf.co.uk/wp-content/uploads/2016/11/Woodford-NA-natural-features-26-Oct-2016.pdf>

- Woodford area OA20 fails the requirements detailed in paras 14.15, 14.24 and 14.29 in the Strategic Options Background Paper 3 – Objectively Assessed Housing Need. There is no easy access to public transport, forcing more traffic on to very congested roads. The nearest railway stations are in Bramhall and Poynton which are 1 -3 miles away from locations in Woodford. Many locations in Woodford are more than half a mile from a bus stop. The TfGM 2040 strategy does not propose any development or improvement anywhere close to Woodford. This is counter to GMSF’s own policies GM15 and GM17.

### 13.3 Undeliverable

- Much of the area is unsuitable for development due to geological features, flooding and tipping. Woodford lies on an aquifer consisting of ground water held in porous sandstones laid down 200 million years ago in the Triassic period, sand and marl (a crumbly mixture of clay and limestone). The area was covered with glacial sediments as the glaciers of the last Ice Age retreated, forming the Cheshire Plain. The soils of Woodford consist mostly of clay, with pockets of sand, including running sand. Drainage is poor and in many areas the ground becomes water-logged and prone to flooding in wet weather. This is supported by environmental studies conducted specifically on the former Woodford aerodrome site, which indicate that the site lies on an aquifer consisting of permeable, solid sandstone and pebble beds with high capacity for water storage. Above this, layers of sand and gravel hold some ground water, while extensive layers of clay are impermeable with very low capacity for water storage.
  
- Subsidence is a recognised feature of this type of ground because cohesive soils such as clay and silt vary in their ability to change their volume when wetted or dried. When wet they will expand (swell) and when dry they will shrink (ref <http://www.subsidence-support.co.uk/what-causes-subsidence.html>).
  
- In the past, water authorities have taken water from the aquifer under Woodford. Some water will be held in the rigid structure of porous sandstone. If there is also water here held in less rigid structures below ground, which seems quite likely, then excess water abstraction could cause subsidence. Ref <http://geochange.er.usgs.gov/sw/changes/anthropogenic/subside/> which states that: In many aquifers, ground water is pumped from pore spaces between grains of sand and gravel. If an aquifer has beds of clay or silt within or next to it the lowered water pressure in the sand and gravel causes slow drainage of water from the clay and silt beds. The reduced water pressure is a loss of support for the clay and silt beds. Because these beds are compressible, they compact (become thinner), and the effects are seen as a lowering of the land surface. The lowering of land surface elevation from this process is permanent. For example, if lowered ground-water levels caused land subsidence, recharging the aquifer until ground water returned to the original levels would not result in an appreciable recovery of the land-surface elevation.
  
- Subsidence and flooding have been observed during the lifetime of long-term residents in parts of Woodford OA20 to the south east and to the north west of Chester Road. Reports include:
  - New cracks in plaster in houses in Chester Road in OA20, one of which is over 300 years old.
  - Undulation, cracking and finally a hole appearing in Chester Road in OA20.
  - Ground level changes in OA20 to the south of Chester Road, such that field drains which used to lead water away downhill in the 1970s now fail to drain as they point uphill.
  - Rafts being needed to support buildings in flood prone areas e.g the Bird Estate near Woodford and a recent extension to a house in OA20 on Moor Lane.

- Reports from workers on the Redrow estate of the need to drive piles down to over 80 feet in order to reach a solid substrate in one area.
- Farmer and resident observations of changes in land level and flooding patterns in OA20 to south of Church Lane.
- Much of the farmland in Woodford is flat and low lying. Water does not drain away through areas of impermeable clay soil, creating seasonal ponds which are a familiar feature to locals and a favourite destination for migratory birds. SUDS would be a significant challenge! The allocation is counter to GM18.
- The central part of Hill Top Farm was used for tipping in 2008 and 2009. The ground level was significantly raised with an assortment of materials and will take time to settle.
- Finally, it is not deliverable because it would not be feasible to provide the very significant improvements in road infrastructure that would be needed to support the huge increase in population proposed here.

#### 14. Conclusions

A local plan is needed but the draft GMSF is not the right plan. Research is needed into more reliable methods of predicting growth. Revisions are needed to produce a plan which meets genuine housing needs, rather than developer-aspirations, which regenerates town centres, and encourages high-skilled employment, which protects Green Belt land and provides an imaginative and sustainable solution for future generations.

Residents have sent you a clear message that they do not want over-ambitious growth aspirations with all the resulting negative effects of high population density, spreading urbanisation, loss of precious countryside and Green Belt, traffic congestion, air pollution, and reduced health, happiness and productivity.

An organised, co-ordinated approach to harness local knowledge should be employed to revise the brownfield site register, Green Belt assessment, environmental and ecological assessments, historical and heritage assessments and local housing needs. The database of information gathered by Woodford Neighbourhood Forum should be used to inform the next draft of GMSF.

 - 6<sup>th</sup> January 2017

Evelyn Frearson, Honorary Secretary, Woodford Neighbourhood Forum  
on behalf of members of the Management Committee