

## Woodford Neighbourhood Forum response to revised GMSF 18 March 2019

### Question 1

#### What type of respondent are you?

I am an agent responding on behalf of an individual, group or organisation

Honorary Secretary submitting on behalf of a Neighbourhood Forum

### Question 2

#### Contact Details

Please give us the contact details of the person completing this consultation response.

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### Question 3

#### Are you over the age of 13?

Data protection laws mean that we are not allowed to store and keep the details of anyone under the age of 13. Please confirm that you are aged over 13

Yes

### Question 4

#### If you're submitting a response on behalf of an organisation or group, please also give us their details

*Organisation / group name / address / postcode / E mail*

Woodford Neighbourhood Forum/ c/o Woodford Community Centre, Chester Road, Woodford SK7 1PS/ [woodfordneighbourhood@gmail.com](mailto:woodfordneighbourhood@gmail.com)

### Question 5

#### We would like to be able to publish responses after this consultation closes. Are you happy for us to do this?

Yes publish my response in full / Yes - publish my response but anonymise it / No

Yes publish my response in full.

### Question 6

#### Do you agree that we need a plan for jobs and homes in Greater Manchester?

Neither agree nor disagree

We support the concept of a spatial framework for a co-ordinated approach to development around Greater Manchester and the general aims in the revised GMSF, but do not believe that this plan will achieve its objectives.

### Question 7

#### Do you agree that to plan for jobs and homes, we need to make the most effective use of our land?

Agree

### Question 8

#### Do you agree that in planning for jobs and homes, we also need to protect green spaces that are valued by our communities?

Strongly Agree

However, ambitions for economic growth currently seem to trump all other considerations in the plan at the risk of failing to achieve the other aspirations for sustainability and quality life, which themselves also impinge on economic prosperity and happiness.

### Question 9

**Do you agree that to protect green spaces, we need to consider how all land in Greater Manchester is used?**

**Agree**

We agree that brownfield land should be identified and delivered before greenspace, greenfield or Green Belt sites.

### Question 10

**Is the approach that we have outlined in the plan reasonable?**

**Mostly disagree**

There are aspects which we support and other aspects which we do not support, as follows:

1. We support the concept of a spatial framework for a co-ordinated approach to development around Greater Manchester and the general aims in the revised GMSF, but do not believe that this plan will achieve its objectives.
2. Support: Improvements have been made since the 2016 draft and we welcome the efforts made to date to reduce Green Belt loss, but they need to go further to protect all the Green Belt, greenfield and countryside that is clearly so very important to residents.
3. Support: We support the focus on town centre regeneration and congratulate the GMCA team on the proposals for Stockport town centre.
4. Support: We support the redistribution of development around the region to reduce pressure on Stockport and allow increased development in other boroughs, provided that residents in those boroughs support it.
5. Objection: We object to development on Green Belt land and support a brownfield first policy.
6. Objection: The GMSF is not sound in proposing development on Green Belt, green fields and countryside, which are very important for the following reasons:
  - Farmland is part of the food production industry. Destruction of it for housing and commercial development increases reliance on imported food and destroys farming livelihoods. As we are leaving the EU, this is not a good time to increase our reliance on imported food by removing farmland.
  - Green spaces are vital to our environment and the network of plants and wildlife (biodiversity) that supports our own fragile niche on the planet. One key example of this is absorption of carbon dioxide and pollutants by green plants.
  - The mental and physical benefits of access to countryside and nature are well documented. The passionate protests about the threat of loss of countryside around the region are evidence of its importance to the residents.

We support the excellent ambitions in GMSF in this regard but protection of our ecological niche and food production should not be ranked below recreation in the order of priorities.

Solution: We ask GMCA to give all these factors the highest level of importance in planning, and adjust priorities so that protection of our ecological niche and food production are at the top.

7. Objection: The GMSF is not justified because it is based on these key factors which are driving towards use of Green Belt land for development:

- Over-inflated population predictions
- Inappropriate economic growth ambitions
- Shortage of deliverable brownfield land

Solution: We ask GMCA to address these issues in further revision of the plan. We believe that use of lower figures can be justified as outlined in point 10 below.

8. Objection: The GMSF is not effective due to absence of an effective, robust policy, either in the current GMSF or national policy, that can enforce brownfield first (or preference) because Green Belt land is released and loses its protection as soon as the plan is adopted. Developers prefer greenfield sites and could win at appeal if refused planning permission. However, we note that CPRE question the statement in paragraph 1.16 that the NPPF does not support an explicit 'brownfield first' approach.

Solution: We ask GMCA to consult Government for advice on whether the NPPF supports a brownfield first approach that could be upheld in a legal challenge. If it doesn't, then a policy that does is needed.

We support CPRE's recommendation that 'subject to maintaining a five year supply, sites that best meet the brownfield and other strategic objectives of this plan shall be released for development first.' is added to Strategic Objective 2.

9. Objection: The GMSF is not justified because it is based on Government advice to use out-dated 2014 ONS population projections to predict housing need, rather than more recent lower figures, which is counter to standard good practice and produces over-inflated numbers.

We know that many economic experts have challenged the notion that there is a shortage of homes per se and that building more will bring prices down. Many experts have pointed out that it is very complex problem and such an over-simplification will not produce the right homes in the right places, reduce house prices, or provide homes for the homeless.  
<http://woodfordnf.co.uk/wp-content/uploads/2019/03/Is-there-a-housing-shortage.-What-the-Experts-are-Saying-6-Dec-2018.pdf>

This another reason which undermines the justification for decommissioning Green Belt to meet inflated housing targets.

10. Even if Government directive is to use the 2014 figures, we believe that GMCA could present a robust argument for using figures that are lower than the target, for the following reasons:

The Housing Minister, Kit Malthouse MP, stated in a Westminster debate on 22 February 2019 and reiterated in a letter to Jim McMahon MP that the housing need target is not mandatory and an inspector would accept a lower number if there are constraints such as Green Belt. <https://www.theyworkforyou.com/whall/?id=2019-02-21a.627.1>  
<http://woodfordnf.co.uk/wp-content/uploads/2019/03/Kit-Malthouse-to-Jim-McMahon-letter.pdf>

James Daly reported that, in a meeting on 13 March 2019 with Bury Folk and the Housing Minister, Kit Malthouse, it was confirmed that, when considering the level of new homes within a Plan, the Inspector must consider the impact on the existing green belt. When considering whether green belt status should be removed, Council's should consider whether the designation is still serving the same purpose for which it was originally put in

place. The need for housing does not automatically trump green belt status and protections for green belt land have been tightened in the NPPF.

The Inspector will look at three tests:

- 1) Does your area have a lack of brownfield sites?
- (2) Is the plan maximising densities on sites identified as suitable for development?
- (3) Are you co-operating with neighbouring authorities to share housing need, including areas outside of GM?

It was stated at the meeting, that in these circumstances if the only land left for development is green belt then this would be strong evidence to persuade a Planning Inspector to accept lower new home numbers than those prescribed by use of the 2014 figures

Solution: If all brownfield sites have been used, densities have been maximised, any potential for neighbouring authorities to take some of the housing need has been fully explored, and only Green Belt sites remain, then there are sound reasons for GMSF to use lower figures for housing need which will be accepted by an Inspector.

11. Objection: The GMSF is not justified because it is based on high economic growth predictions, which give rise to use of Green Belt land for commercial space, as well as housing. We refer you to the CPRE Economic Report which notes that:

- Adding 50% to the forecasts for commercial floor space for flexibility is extremely high.
- The calculations have not allowed for space that will become available during the plan period due to businesses relocating and are therefore too high.
- Much of the additional growth generated by the strategy is expected to attract more in migration into the conurbation. There is a risk that housing may be allocated to support employment that does not materialise.
- The overall quantum of employment sites required appears overly high. The total demand is high and may result in an over-allocation of sites, which could impact on the viability of the less favourable sites to come to the market.
- On a twenty year view it appears that there are too many sites and premises allocated, and the allocations do not pay enough attention to recognising new brownfield sites (in favourable locations) that will come forward as businesses turnover within Greater Manchester.
- We think it would be prudent that greenbelt sites are safeguarded until a threshold in takeup of other sites has been met.

WNF fully understands the good motives behind the push for economic growth, but the ambitions are too high and misplaced when the region already has significant problems with overcrowding, traffic congestion, air pollution and health, which would worsen.

Solution: Reduce the economic ambitions until transport, air quality and health provision have been improved. Until then the proposals will do more harm than good.

11. Objection: Given the uncertainties over the population and economic predictions it seems unwise to in this climate to produce a 20 year plan (now 19 year). This could do more harm than good by releasing Green Belt land unnecessarily. Cllr Kenny Blair on behalf of High Lane has note that, according to the numbers shown in the GMSF Housing Topic paper, there is more than enough brownfield land to satisfy the projected housing needs over that period without using Green Belt land. He has recommended a 15-year plan period.

Solution: We recommend a shorter plan period to avoid unnecessary Green Belt loss. There is sufficient land supply for a plan period up to 17 years without releasing any Green Belt land. The minimum time period for a spatial or local plan is 15 year, so this would still leave time for local plans to follow on the heels of GMSF.

12. Objection: The need for industrial space appears to have been over-estimated. We refer you to the CPRE Economic Report which notes that:

- GMSF fails to acknowledge that the overall requirement for industrial space has declined across Greater Manchester over the last 15 years, and is likely to continue to do so.
- There has been an annual decline in the amount of floor space occupied in GM each year for the 15 years, so there should be a lot of vacant space becoming available over the period which could be added in (windfall sites).
- Over the 15 years there has been a net reduction in the amount of rateable industrial space of 4.6 million sqm and this trend is expected to continue. Without an appropriate strategy to manage existing industrial areas there is a risk of a continued expansion onto new sites while leaving older sites vacant and derelict.
- There is concern that the estimate of need for more industrial floor space is over inflated to build-in too many upward adjustment factors (adjustments to account for the recession, allow for margin and allow for flexibility). We suggest that the 25% uncertainty in the market could be managed in different ways, whilst allowing flexibility in the marketplace.
- The quantum of industry and warehousing sites is inflated over a 20 year period. The total amount of space required is likely to be less, and potential windfall sites need to be factored into the analysis. The result of the current strategy to provide a large number of new industrial sites could result in an increasing volume of vacant or derelict brownfield sites.
- We would like to see phasing of any new sites to ensure prime sites are prioritised. There needs to be more focus on short to medium term needs, rather than the longer-term needs to ensure sites are sustainably phased into use.

13. Objection: Large areas of warehousing proposed on Green Belt land are not justified when and warehousing tends to involve a small number of low paid, low skilled jobs and generates road traffic, particularly heavy goods vehicles. We refer you to the CPRE Economic Report which notes that:

- Growth is focussed on logistics, which is not typically high skilled, and high value, despite the SF focussing on addressing the productivity gap
- The GMSF could prioritise building on the region's strengths in high value and advanced manufacturing to increase the productivity challenges we have in Greater Manchester.
- The GMSF needs to consider the risk factors of development including low skilled jobs, sustainable travel to work patterns, HGV movements across the region, and the proposed large floorplates of industrial and warehousing premises.
- The focus on logistics in the North of the region could lead to increased congestion on the region's already congested motorway network.
- There needs to be a focus on allocating sites that are close to where people live to ensure sustainable transport patterns. And prioritise smaller sites in the town centres to be made more attractive to host some of the proposed development to meet the 'diverse' supply required.

Solution: Reduce the quantity of industrial space and remove warehousing allocations on Green Belt land.

14. Objection: the plan is not sound until we are sure that all previously developed sites, poorly used commercial premises, empty houses and dilapidated houses are identified and used.

CPRE have noted that there are more brownfield sites in existence than are recorded on brownfield registers. If the brownfield sites are recorded more accurately, the exceptional circumstances for the scale of Green Belt loss suggested would not exist.

Solution: Ensure that none of these are overlooked and harness the potential of residents on the ground with good local knowledge who are prepared to contribute to the search.

15. Objection: The plan is not effective because the proposals for infrastructure are not developed in sufficient detail to support the proposals for development.

Solution: Sort out and deliver the infrastructure needs in the region before any further development is considered.

### Question 11

#### **Do you have any comments about the context of the plan?**

1. Objection: Economic forecasts incorporate an Accelerated Growth Scenario which comes out very high (Para 2.5.).

Overly high ambitions, which may not be realised, could result in unnecessary Green Belt release. This will produce a plan that is not sound because it is not justified.

If high growth rate is achieved, it will put more traffic and freight on the roads and increase air pollution. This will produce a plan that is not sound because it is not sustainable.

For more details see CPRE response and CPRE Economic Report.

2. Objection: Greater Manchester is not a city as stated at numerous points in the revised GMSF. Greater Manchester is a region not a city. It is comprised of a diverse range of component parts, including urban city and town centres, leafy suburbs, rural villages and wild moors. To speak of the whole region as a "city" suggests plans for urbanisation that would be very much at odds with the aspirations of a large number of residents. This may not be the intention, but language is very important.

3. Objection: For greater sustainability and with the well-being of future generations in mind:

- The plan does should acknowledge that working from home is more sustainable than commuting, as pointed out by CPRE.
- The plan should aim to encourage local production of food to reduce food miles.
- Farmland should be retained as a precious resource for food production by future generations. It would be very difficult to recover once built on.
- The plan should aim to reduce transport of freight by road, which leads to use of fossil fuels, air pollution, traffic congestion and harm to residents and the environment.
- Manchester airport should not expand and the number of flights should not be increased.

3. Comparisons with London are not helpful. Many residents would not wish to emulate that lifestyle and have made conscious decisions and career choices to avoid living there.

### Question 12

#### **Do you agree with the Strategic Objectives?**

**Neither agree nor disagree**

What is the reason for your answer?

These are good objectives but not in the right order. Numbers 2-5 cannot be achieved unless numbers 6 -9 are put first.

The objectives tend to focus on an urban lifestyles and contain very little to support the rural economy, local food production, reduction in food miles, or the contribution to the economy of diversified farm businesses.

Some of the policies do not meet these objectives e.g. Manchester airport expansion, excess warehousing, transport of freight by road, allocations on Green Belt.

### Question 13

#### **Do you agree with the Spatial Strategy?**

**Mostly disagree**

What is the reason for your answer?

See comments on Question 10. In addition:

1. Objection: The plan aims for occupancy levels of less than 2 people per dwelling. That seems very low and an unsustainable proposition.
2. Objection: GM Strat-14  
These proposals will work well for the city centre and towns. They cannot be applied to the more rural parts of the region because, on a scale likely to be effective, these measures would be very difficult, very expensive and would damage precious countryside, farmland, wildlife habitats and the character of the countryside. One size will not fit all. Greater Manchester is very diverse in nature
3. Objection: Strat-9  
Expansion of Manchester airport is not a sustainable proposition until green and clean aviation fuel has been developed and freight is moved by rail not road.
4. Objection: Robust policy is needed at local and national level to ensure that "brownfield first" can be enforced in order to prevent developers winning at appeal if they submit and are then refused planning applications for former Green Belt land (which may now have little protection from NPPF policy) in advance of use brownfield sites.
5. Green Belt loss for development could be prevented by one of more of the following steps: making a strong case for using lower figures than the target housing figures because all sources of land have been thoroughly explored, leaving only Green Belt land; reducing housing and economic ambitions to more realistic levels; utilising more brownfield sites and reassessing criteria for deliverability; and/or aiming for a shorter plan period such that there is a sufficient supply of brownfield land.

### **Question 22. Southern Areas Do you agree with our proposed policy for Southern Areas?**

**Neither agree nor disagree**

1. Objection: Expansion of Manchester airport is not a sustainable proposition until green and clean aviation fuel has been developed and freight is moved by rail not road.
2. Use of Green Belt land for commercial buildings to support airport expansion is not justified or sustainable.

3. Objection: The airport also causes significant noise and disturbance air pollution for residents in surrounding areas including Heald Green, Gatley, Cheadle Hulme and Woodford.
4. Support: We agree that neighbourhood quality and environmental attractiveness of the southern areas should be protected and enhanced. Woodford falls within the Shropshire, Cheshire and Staffordshire Plain National Character Area, which is described as a pastoral area of rolling agricultural plain. Residents are very keen to protect this character and its component features as described in the draft Woodford Neighbourhood Plan. We are very pleased that some of these features and the draft Woodford Neighbourhood Plan were acknowledged in the revised draft GMSF under allocation GM 41.
5. Comment: Point of detail. We read with interest the description of Woodford in the paper produced by LUC for SMBC in Aug 2018 description of Woodford in topic paper. Overall, we agree with the assessment, except for some exaggeration of a couple of points:
  - Aircraft noise causes disturbance only when the outbound flight path to the south east is used (less than 10% of flights)
  - The extent of degraded hedges. There are some hedgerows which have been removed and some which have not been regularly trimmed and have become very tall, but it should be noted that there are many well-maintained hedgerows and many species rich hedgerows in Woodford, which are important habitats for protection.

WNF Natural features map: <http://woodfordnf.co.uk/wp-content/uploads/2018/04/Woodford-NA-natural-features-17-Oct-2017.pdf>

WNF Landscape and Environment Study Report: <http://woodfordnf.co.uk/wp-content/uploads/2018/09/Woodford-Landscape-and-Environment-Report-Part-1-September-2018.pdf>

Cheshire Wildlife Trust Report: <http://woodfordnf.co.uk/wp-content/uploads/2018/01/CWT-report-for-WNF-Protecting-and-Enhancing-Woodfords-Natural-Environment-Jan-2018.pdf>

6. Comment: We note that in that fig 4 in the Natural Environment topic paper classifies Woodford as urban fringe. In another document it is classified in the same category as Bramhall and yet 78% of the Woodford Neighbourhood Area is farmland. We are pleased to note that in fig 6.1 in the Greenbelt Assessment topic paper it is classified as "open land".
7. Objection: We could not find the appendices for the Greenbelt Assessment topic paper.

### **Question 23. Do you agree with our proposed policy for Manchester Airport?**

#### **Disagree**

1. Objection: Expansion of Manchester airport is not a sustainable proposition until green and clean aviation fuel has been developed.
2. Objection: Transport of goods to and from the airport by road is not a sustainable proposition.
3. Objection: Use of Green Belt land for commercial buildings to support airport expansion is not justified or sustainable. See comments for question 10.



4. Objection: The airport also causes significant noise disturbance for residents in surrounding areas including Heald Green, Gatley, Cheadle Hulme and Woodford. Additional flights will significantly reduce quality of life for those residents.

#### **Question 24. Do you agree with our proposed policy for New Carrington?**

##### **Disagree**

Objection: Development on any of Carrington Moss is counter to your own policies GM-S 1 and GM-S 2.

Mossland is important to retain because it absorbs large quantities of carbon dioxide and is also classified as an NERC Habitat of Principle Importance because of the wildlife it supports.

#### **Question 25. Main town centres**

##### **Mostly agree**

Support: We support regeneration of Stockport town centre and congratulate the team on their efforts on this. In the case of Stockport, there has been a tendency for loss of retail outlets and for migration out to leafy suburbs for living accommodation, leaving the town centre looking run down and place many of us in Woodford currently avoid. With the future of retail changing due to popularity of out-of-town shopping centres and internet shopping, it seems sensible to re-imagine town centres for residential accommodation, near to public transport and potentially near to employment, leisure and any remaining retail facilities.

#### **Question 26. Strategic green infrastructure**

##### **Mostly agree**

1. Support: All those features listed warrant protection.
2. Objection: Hedgerows, Grassland and Unimproved Field Margins are important habitats without emphasis here. Farmland needs protecting for economic, aesthetic and quality of life reasons.

#### **Question 27. A sustainable and integrated transport network**

##### **Neither agree nor disagree**

Strat-14 Support: It is sensible to increase housing density around sustainable transport in urban locations.

Object: These proposals could work well for the city centre and towns. It is much more difficult to apply to the more rural parts of the region because, on a scale likely to be effective, these measures would damage precious countryside, farmland, wildlife habitats and the character of the countryside. One size will not fit all. Greater Manchester is very diverse in nature. The allocations in Green Belt in out of town locations are both unnecessary and unsustainable. Removal from the plan removes the challenge of achieving sustainable transport to them.

#### **Question 28. Sustainable development**

##### **Neither agree nor disagree**

1. Support: We support sustainable development and brownfield first, but have serious doubts that it can be enforced in GMSF.

2. Objection: As soon as the plan is adopted, Green Belt allocations are out of Green Belt and lose their protection. As they will now be greenfield sites, developers will want to develop those first, because it is easier and more profitable than more challenging brownfield sites. How will GMSF ensure that developers will not win at appeal if their planning applications for former Green Belt and now greenfield sites are refused? We ask whether the brownfield first policy can be enforced.

Solution: Would it be possible to leave the allocations in Green Belt, earmarking but not decommissioning them, until such time as all the brownfield sites have been utilised?

Alternatively, a 17 year plan would have almost sufficient land supply without allocating any Green Belt sites.

### **Question 29. Carbon and energy**

**Agree**

Support: We support the aims in this section, which need to be addressed as a high priority.

Objection: The aim to expand the capacity of the airport and the aims to build warehouses near motorways contravene this proposed policy unless green/clean aviation fuel and green technology for freight transport have been developed.

### **Question 30: Do you agree with the proposed policy on Heat and Energy Networks?**

**Agree**

Support: We support energy networks based on renewable technology.

### **Q31. Do you agree with the proposed policy on Resilience?**

**Agree**

### **Q32. Do you agree with the proposed policy on Flood Risk and the Water Environment?**

**Strongly Agree**

Support: The flooding seen around Greater Manchester on Saturday 16th March provides evidence of the urgency to address bouts of higher than rainfall that are associated with the change in climate that has already occurred. An example was the flooding on the A555 in Bramhall. This is a new road, presumably built with the benefit of knowledge of the new flood risks, and yet it did not cope with high rainfall.

### **Q33. Do you agree with the proposed policy on Clean Air?**

**Strongly agree**

Support: Poor air quality is a major concern for many residents around Greater Manchester. The ambitions in the policy are strongly supported.

Objection: Some of the other policies, including expansion of Manchester airport and location of warehouses near the motorway network for transport of freight by road, are at odds with the clean air policy.

### **Q34. Do you agree with the proposed policy on Resource Efficiency?**

**Agree**

Support: These policies are strongly supported. There is much to be done here. Notably, plastic recycling needs to be improved. the technology is available and other areas of the country do much better in this regard.

**Question 35: Do you have any comments about a sustainable and resilient Greater Manchester?**

Very good aspirations that will need energy and funds to push along. Residents in Woodford are keen to reduce their negative impact on the environment.

**Question 36. Supporting long-term economic growth**

**Neither agree nor disagree**

Support: We support aims to improve prosperity for residents in Greater Manchester.

Objection: We do not support "economic growth at any price", no matter what harm it does to residents' quality of life or the environment.

**Question 37. Employment sites and premises**

**Disagree**

We object to any Green Belt land being used for employment sites. CPRE Economic Report indicates that need and ambitions for employment sites are over inflated. The need to use any Green Belt land for employment sites could removed by:

- Reducing economic ambitions to more realistic levels which do not require use of Green Belt land.
- Utilising more brownfield sites by identifying them all and reassessing criteria for deliverability.
- Aiming for a shorter plan period such that there is a sufficient supply of land without using Green Belt
- Presenting a strong case that all avenues have been explored and the only remaining land available is Green Belt land, therefore GMCA are justified in using lower numbers for population and economic predictions.

**Question 38.**

**Disagree**

Objection: There is empty office space now in our locality. Why do we need to plan for more? Also see answer to question 37.

**Question 39. Industry and warehousing development**

**Disagree**

Objection: We agree with the general aims, but not the proposals for large warehouses aimed at road transport and especially not those proposed on Green Belt land.

**Question 40. Do you have any comments about a prosperous Greater Manchester?**

Comment: In order to prosper in the long-term, some of the key problems people perceive need to be sorted out. Concerns in Woodford include congested roads, Stockport town centre in need of regeneration, loss of precious countryside, inadequate and failing public transport, insidious and pervasive influence of big development companies at all levels of central government, local government and planning, resulting in luxury and expensive houses being built on the open market on greenfield and Green Belt sites.

**Question 41. Scale of new housing development**

**Disagree**

1. Objection: We do not agree with the scale of new housing development because it is based on Government advice to use out-dated 2014 ONS population projections to predict housing need, rather than more recent lower figures, which is counter to standard good practice and produces over-inflated numbers. In addition, the Government has stated that the housing

methodology is temporary and will be reviewed over a period of 2 years. How is this level of uncertainty compatible with the preparation of a 19-year plan?

2. Objection: We know that many economic experts have challenged the notion that there is a shortage of homes per se and that building more will bring prices down. Many experts have pointed out that it is very complex problem and such an over-simplification will not produce the right homes in the right places, reduce house prices, or provide homes for the homeless. <http://woodfordnf.co.uk/wp-content/uploads/2019/03/Is-there-a-housing-shortage.-What-the-Experts-are-Saying-6-Dec-2018.pdf>

3. Objection: The Housing Minister, Kit Malthouse MP, stated in a Westminster debate on 22 February 2019 and reiterated in a letter to Jim McMahon MP that the housing need target is not mandatory and an inspector would accept a lower number if there are constraints such as Green Belt. <https://www.theyworkforyou.com/whall/?id=2019-02-21a.627.1>  
<http://woodfordnf.co.uk/wp-content/uploads/2019/03/Kit-Malthouse-to-Jim-McMahon-letter.pdf>

4. Objection: The message from Government seems to be that if all brownfield sites have been used, densities have been maximised, any potential for neighbouring authorities to take some of the housing need has been fully explored, and only Green Belt sites remain, then there are sound reasons for GMSF to use lower figures for housing need which will be accepted by an Inspector.

Solution: We ask GMCA and Government to accept that there are exceptional circumstances in Greater Manchester and to reduce target figures, in order to protect Green Belt land, and change the focus from meeting inflated numbers to providing the right homes in the right accessible places.

#### **Question 42. Affordability of new housing**

**Mostly agree**

Objection: We know that many economic experts have challenged the notion that there is a shortage of homes per se and that building more will bring prices down. Many experts have pointed out that it is very complex problem and such an over-simplification will not produce the right homes in the right places, reduce house prices, or provide homes for the homeless. <http://woodfordnf.co.uk/wp-content/uploads/2019/03/Is-there-a-housing-shortage.-What-the-Experts-are-Saying-6-Dec-2018.pdf>

Support: We support provision of more affordable and social housing, provided that it is in accessible, sustainable locations very close to public transport, employment opportunities and retail, education and health facilities. Many of the Green Belt allocations do not meet these criteria and rely on future infrastructure which may never materialise.

Support: We support points 2 - 5.

#### **Question 43. Type, size and design of new housing**

**Agree**

#### **Question 44. Density of new housing**

**Agree**

#### **Question 45. Do you have any comments about homes for Greater Manchester?**

The housing crisis is a complex issue involving many aspects of modern life and culture, which cannot be solved by planning alone. Nevertheless, this plan goes some way towards it, but there is too much emphasis on numbers of housing. If the numbers are achieved by allowing yet more expensive new homes to be built, it will solve very little and create more problems.

#### **Question 46. Valuing important landscapes**

**Agree**

#### **Question 47. Green infrastructure network**

**Agree**

#### **Question 48. River valleys and waterways**

**Agree**

#### **Questions 49 to 55**

**Agree** in all cases.

#### **Question 52. Trees and woodland**

**Agree**

Hedgerows should be included here. Hedges near roads can help to remove particulate matter from traffic fumes. Native hedgerows in the countryside are protected habitats performing key roles in absorption of carbon dioxide, providing habitats and corridors for wildlife and adding to the aesthetic appearance.

#### **Question 56. The Greater Manchester Green Belt**

**Mostly disagree**

Objection: We do not support use of Green Belt Land for development. It should not be necessary for the reasons outlined in question 10.

The allocations could be deleted from the plan by one or more of the following steps:

- Making a strong case for using lower than target housing figures because all sources of land have been thoroughly explored, leaving only Green Belt land.
- Reducing economic ambitions to more realistic levels which do not require use of Green Belt land.
- Utilising more brownfield sites by identifying them all and reassessing criteria for deliverability.
- Aiming for a shorter plan period such that there is a sufficient supply of land without using Green Belt.

We have concerns that it may not be possible to enforce this statement if challenged by developers:

"Green belt policies will be strictly applied to the development areas removed from the green belt by this plan except in the case of planning applications complying with the relevant allocations policies"

Is this policy robust enough and supported by the NPPF, in order to stand up to a legal challenge?

We support CPRE's recommendation that 'subject to maintaining a five year supply, sites that best meet the brownfield and other strategic objectives of this plan shall be released for development first.' is added to Strategic Objective 2.

#### **Questions 58 -63**

**Agree** in all cases

#### **Question 64**

No comments made.

#### **Questions 65 -68**

**Agree**

#### **Question 69**

##### **Do you agree with the proposed policy on the Transport Requirements of New Development?**

The policy is not worked up insufficient detail to know whether it will support sustainable development. For example, para 10.50: "The scale and lead-in time for some of the highway infrastructure proposals may mean that they are only completed towards the end of the GMSF plan period or beyond."

#### **Question 70: Do you agree with the proposed policy on Highways Infrastructure Improvements?**

**Neither agree nor disagree**

The policy is not worked up insufficient detail to know whether it will support sustainable development.

#### **Question 71. Freight and logistics**

**Mostly disagree**

Objection: This does not sound like a sustainable proposition. There seems to be a contradiction here with carbon and sustainability policy aims.

#### **Questions 72 and 73**

Not answered.

#### **Site allocations**

For all allocations in Green Belt in Bolton, Bury, Manchester, Oldham, Rochdale, Stockport, Tameside, Wigan I clicked **Disagree** and under this questions in each section: Do you have any further comments on the overall proposals... Inserted a standard phrase:

We do not support use of Green Belt land for development. The proposals are causing thousands of residents to protest. It is seen as doing more harm than good to the prosperity, health and happiness of existing residents.

The allocations could be deleted from the plan by one or more of the following steps:

- Making a strong case for using lower than target housing figures because all sources of land have been thoroughly explored, leaving only Green Belt land.
- Reducing economic ambitions to more realistic levels which do not require use of Green Belt land.
- Utilising more brownfield sites by identifying them all and reassessing criteria for deliverability.
- Aiming for a shorter plan period such that there is a sufficient supply of land without using Green Belt.

For allocations in Stockport a little more detail was included:

#### **Question 116. Stockport - GM Allocation 34: Bredbury Park Extension**

**Disagree**

1. Objection: The GMSF is not justified because it is based on high economic growth predictions, which give rise to use of Green Belt land for commercial space, as well as housing. These are open to challenge. We refer you to the CPRE Economic Report March 2019 which notes that the forecasts used in GMSF are too high.
2. Objection: When housing needs and economic needs are more realistically calculated and when all brownfield sites are found and used, and/or a shorter plan period is used there should be no need to build on Green Land. See comments in question 10.

**Question 117. Stockport - GM Allocation 35: Former Offerton High School**

**Mostly Disagree**

Support: Any previously developed land here should be used.

Objection: Green Belt land should not be used, particularly if there is local objection. When housing needs and economic needs are more realistically calculated, or the case is made for using a lower target, and/or a shorter plan period is used, there should be no need to build on Green Land. See comments under question 10.

**Question 118. Stockport - GM Allocation 36: Gravel Bank Road / Unity Mill**

**Mostly Disagree**

Support: Redevelopment of an old mill here is exactly the sort of thing we should be doing.

Objection: Green Belt land should not be used, particularly if there is local objection. When housing needs and economic needs are more realistically calculated, or the case is made for using a lower target, and/or a shorter plan period is used, there should be no need to build on Green Land. See comments under question 10.

**Question 119. Stockport - GM Allocation 37: Heald Green**

**Disagree**

1. Objection: There is overdevelopment locally. When you add the proposed GMSF developments in Heald Green, Stanley Green and Woodford to the large development on Woodford Aerodrome site, which is already underway, and Handforth Garden Village, which is approved in the Cheshire East Local Plan, there would be a very large cumulative impact on loss of green belt and on local infrastructure, particularly roads. It seems unlikely to be feasible to improve transport infrastructure to cope with it.  
Solution: Planning permission for Handforth Garden Village should not be supported. GMSF allocations in Heald Green, Stanley Green and Woodford should be deleted.
2. Objection: When housing needs and economic needs are more realistically calculated, or the case is made for using a lower target, and/or a shorter plan period is used, there should be no need to build on Green Land. See comments under question 10.

**Question 120. Stockport - GM Allocation 38: High Lane**

**Disagree**

Objection: The A6 through High Lane and Disley is very congested at times, with very slow journey times. Residents are very worried about air pollution.

Objection: When housing needs and economic needs are more realistically calculated, or the case is made for using a lower target, and/or a shorter plan period is used, there should be no need to build on Green Land. See comments under question 10.

**Question 121. Stockport - GM Allocation 39: Hyde Bank Meadows**

**Disagree**

Objection: When housing needs and economic needs are more realistically calculated, or the case is made for using a lower target, and/or a shorter plan period is used, there should be no need to build on Green Land. See comments under question 10.

**Question 122. Stockport - GM Allocation 40: Griffin Farm, Stanley Green**

**Disagree**

1. Objection: There is overdevelopment locally. When you add the proposed GMSF developments in Heald Green, Stanley Green and Woodford to the large development on Woodford Aerodrome site, which is already underway, and Handforth Garden Village, which is approved in the Cheshire East Local Plan, there would be a very large cumulative impact on loss of green belt and on local infrastructure, particularly roads. It seems unlikely to be feasible to improve transport infrastructure to cope with it.
2. Objection: When housing needs and economic needs are more realistically calculated, or the case is made for using a lower target, and/or a shorter plan period is used, there should be no need to build on Green Land. See comments under question 10.

Solution: Planning permission for Handforth Garden Village should not be supported. GMSF allocations in Heald Green, Stanley Green and Woodford should be deleted.

**Question 123. Stockport - GM Allocation 41: Woodford Aerodrome**

**Disagree**

Please explain your answer

1. Support: We strongly support the removal of the proposal for Woodford in former draft GMSF (OA20). The Woodford Neighbourhood Forum and the majority of Woodford residents are very relieved, for the following reasons:
  - a. Woodford is distinct in character from other locations in Stockport Borough. It falls within the Shropshire, Cheshire and Staffordshire Plain National Character Area, which is described as a pastoral area of rolling agricultural plain. Woodford is entirely in Green Belt. The Woodford Neighbourhood Area is 78% farmland. When farmland is taken for development, any current and potential future contribution to local food or renewable energy production is lost. These functions are likely to become increasingly important. In addition, a farm or diversified farm is a business and a workplace providing employment, which should be afforded the same level of protection as any other business premises. Once used for housing, any future attempts to return it to agricultural use would be very difficult. In our response to the 2016 GMSF, we explained in detail the host of reasons why the previous proposed allocation was entirely unsuitable. Therefore, we strongly support the removal of the Woodford allocation shown in the previous draft.



b. Residents are very keen to protect the rural character of Woodford and its natural features, as described in the draft Woodford Neighbourhood Plan. The most important of these include the open countryside, views of countryside and the Pennine hills to the east, and the abundance of native trees, native hedgerows and ponds, all supporting local wildlife. We are very pleased that the draft Woodford Neighbourhood Plan and some of these features were acknowledged in the revised draft GMSF under allocation GM41. It is very good and sensible that local knowledge and professional studies conducted on behalf of Woodford Neighbourhood Forum have provided local detail and informed higher tier plans. We thank the GMCA team for their wisdom in that.

2. Objection: The southern end of site GM 41 is currently in Green Belt and is due to be returned to fields when the current Redrow development at the northern end is completed. The outline planning permission for the southern end of the site includes fields with hedgerows, trees and field margins for wildflowers and wildlife. The current GMSF proposal takes this land for further housing development and represents loss of Green Belt and countryside. If not developed this land will contribute to agricultural production and help to offset the damaging effects of the human population on the environment. These are increasingly important considerations, as the draft GMSF itself points out in the Natural Environment section para 2.11: “ On plan making, in Chapter 3, Section (d) of Paragraph 20 states that strategic policies should make sufficient provision for the conservation and enhancement of the natural environment, including green infrastructure to address climate change mitigation and adaption.”

Solution: Increase density on the current Redrow site to accommodate more housing and spare Green Belt and valuable countryside.

3. Objection: There is overdevelopment in Woodford. 750 additional houses are proposed on the aerodrome site in addition to 920 + Redrow homes that already have planning permission. The current proposal would be overdevelopment in Woodford. The resulting total of 1,700+ new dwellings on the aerodrome site would overwhelm local infrastructure, especially roads.

Solution: Reduce the housing numbers proposed.

4. Objection: There is overdevelopment in the local area. When you add the proposed GMSF developments in Heald Green, Stanley Green and Woodford to the large development on Woodford Aerodrome site, which is already underway, and Handforth Garden Village, which is approved in the Cheshire East Local Plan, there would be a very large cumulative impact on loss of green belt and on local infrastructure, particularly roads. It seems unlikely to be feasible to improve transport infrastructure to cope with it.

Solution: Planning permission for Handforth Garden Village should not be supported. GMSF allocations in Heald Green, Stanley Green and Woodford should be deleted.

When housing needs and economic needs are more realistically calculated, or the case is made for using a lower target, and/or a shorter plan period is used, there should be no need to build on Green Land. See comments under question 10.

5. Comment: Development on the aerodrome site with two access point on Chester Road is currently capped at 940 homes due to traffic and emergency access issues. Profound improvements in public transport would be needed to reduce car use in this inaccessible location and seem unlikely to be feasible. We note that, despite ambitions for public

transport for the Redrow site, this has yet to materialise and residents are making trips by car. Therefore, a link to the Poynton Relief Road (PRR) would be essential.

Solution: No further development until a link to PRR is delivered

6. Objection: It is questionable whether it would be an accessible location for affordable housing and housing for the elderly, unless significant infrastructure is put in place first, providing easy access to employment, shopping and health facilities.

Solution: Use developer contributions to fund affordable housing and housing for the elderly in more accessible locations, such as the Stockport town centre regeneration project.

7. Objection: Avro golf course would be taken out of Green Belt. It is an important, accessible green space for recreation and includes a footpath.

Solution: There should be no development on the Avro golf course site, which should be excluded from the allocation and remain in Green Belt.

8. Comment: Old Hall Lane is very narrow, part of the character of old Woodford and unsuitable for access.

Solution: There should be no vehicular access to GM 41 via Old Hall Lane.

#### **Question 124. Do you have any further comments on the overall proposals for Stockport, including strategic transport interventions?**

Comment: The Rapid Transit Busway, if put in place at all, should follow existing roads through Woodford, with minimal disruption to countryside, green space, existing structures and aesthetic appearance. In this inaccessible location it is unlikely to be able to replace many car trips, in order to justify any harm caused.

Objection: It would not be possible to introduce sufficient public transport and local amenities to some of the allocations in Green Belt, including Woodford, without significant urbanisation, which would profoundly damage their current character and function.

#### **Question 138. Do you have any further comments on the proposed allocations?**

The use of Green Belt land is highly contentious causing thousands of residents to protest. It is seen as doing more harm than good to the prosperity, health and happiness of existing residents.

The allocations could be deleted from the plan by one or more of the following steps:

- Making a strong case for using lower than target housing figures because all sources of land have been thoroughly explored, leaving only Green Belt land.
- Reducing economic ambitions to more realistic levels which do not require use of Green Belt land.
- Utilising more brownfield sites by identifying them all and reassessing criteria for deliverability.
- Aiming for a shorter plan period such that there is a sufficient supply of land without using Green Belt.

#### **Question 139. Do you agree with proposed policy on Infrastructure Implementation?**

**Disagree**

What is the reason for your answer?

The proposals for infrastructure are not developed in sufficient detail to support the proposals for development. The infrastructure needs to be in place first in order to avoid the plan doing more harm than good. For many of the allocations that seems unlikely to be feasible.

**Question 140. Do you agree with proposed policy on Developer Contributions?**

**Neither agree nor disagree**

What is the reason for your answer?

Developer contributions could be very helpful if they are enforced. However, we hear that they currently allow them to insist on high profit margins and to avoid making their contributions if these high profits are likely to be eroded.

Solution: The loopholes allowing avoidance of contributions and responsibilities need to be closed.