

**Elected Councillors for Bramhall South and Woodford, Stockport Metropolitan Borough Council.**

**Cllr. Brian Bagnall, Cllr. Mike Hurleston and Cllr. John McGahan**

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**Greater Manchester Spatial Framework (GMSF) Response**

**Introduction**

Overall, the GMSF aims to put forward a positive and ambitious vision for Greater Manchester seeking to secure long term economic growth, supports transformative regional change in transport networks and deliver housing which is in the right place and at the right scale. However, the plan raises a number of concerns, issues and questions and it is not clear that the vision outlined will be achieved by the plan as put forward.

**Housing Projections**

We note the recent comments of the Minister of State for Housing, Kit Malthouse MP, that housing targets are not mandatory and that authorities' should exhaust all other reasonable options before green belt release and then evidence exceptional circumstances to justify development.

Stockport Conservative Group remain in favour of a Brownfield first approach and recognise the value that our residents put on green belt land in our Borough and the contribution it makes to maintaining the character of distinct communities and to the health and wellbeing of local people.

We further note that the GMSF proposes that over twenty-five per cent of Stockport's total new housing development target is delivered from Greenbelt sites. Of the 14,520 new dwellings in Stockport, 3,700 are proposed to be delivered from Greenbelt.

This is a high level of Greenbelt take, and given that the strategy specifically states there is likely to be only "modest change" in the population and economy of the Stockport seems disproportionate.

Stockport Conservative Group note the 19 year length of the Strategy timeframe 2018-37. We note the correlation between timeframe, housing need and land supply. With a shorter plan, housing need and land supply figures align more closely and there would be no need to build on Greenbelt.

Stockport Conservative Group support the retention of decisions to alter the boundary of the greenbelt by the relevant district local authority and not at strategic GM level.

We welcome the focus on regenerating town centres by developing a mixed retail and housing offer. Stockport Conservative Group welcome the diversification of Stockport Town Centre but would wish to see a mix of housing types and sizes provided, with high quality design and with adequate social infrastructure.

Stockport Conservative Group note that there were 30,302 empty homes recorded in Greater Manchester in 2017, with 10,827 of these recorded as long term empty homes. In Stockport, there were 1,080 long term empty homes recorded in 2017. If such homes could be brought back into use this would make a valuable and sustainable contribution to housing in Stockport Borough and could make a contribution to reducing the amount of green belt take. We would welcome a reassessment of what contribution long term empty homes could make to reducing green belt take.

### **Infrastructure**

The GMSF rightly places a priority on delivering housing in a sustainable manner. The infrastructure requirements for a strategy of this size and for the very large site allocations put forward are huge and it is not clear that the necessary supporting infrastructure can be delivered and delivered in a timely fashion which supports current residents and sustainable future communities. For Stockport, the strategic transport requirements are very significant and relatively few transport projects are committed and guaranteed for delivery. A number of transport projects are at an early stage of assessment or development and would have long lead in periods. The overall delivery of the major strategic transport schemes is back loaded to the later part of the plan period and with site delivery requiring these schemes, it is unclear whether the housing site allocations can or will be brought forward and without the necessary infrastructure many sites quickly become unsustainable.

Public transport improvements are welcome, but the majority of commuting journeys in and through Stockport are by car and this is likely to continue particularly with the capacity issues being experienced by the rail network. Walking and cycling improvements are welcome but there is minimal recognition in the strategy that modern commuting patterns may be multi-

legged (for example, incorporating school drop-offs, caring responsibilities or stops for leisure and gym visits) and the average distance travelled to work in the UK is around 15K. Such journeys by bike or walking would be difficult, impractical and time consuming and there may be limited scope for improving modal switch during the rush hour from the site allocations proposed for Stockport Borough.

Stockport Conservative Group support the provision of additional and improved infrastructure alongside new housing development which absorbs the demand generated and builds in future capacity. We remain concerned about the ability to deliver this at pace and the lack of detail on how this will be achieved.

It is also clear that there will be very significant new demand generated for health provision and school places and again we remain concerned at the lack of detail on how this will be met.

### **Site selection**

We note the GMSF takes a brownfield preference approach and seeks to focus development in urban areas at higher densities and closer to public transport access.

Stockport Conservative Group remain in favour of a “brownfield first” policy and believe there should be a continued exhaustive search for brownfield sites throughout.

We note strategically, that for Stockport, the Greenbelt sites proposed for housing development by the GMSF put the vast weight of development – around 3000 new dwellings - towards the South West and South East of the Borough, close to the border of the local authority area. Stockport Conservative Group raise concerns over the sustainability of locating this level of development in these locations for a number of reasons. The GMSF states that it wishes to locate new development close to the existing infrastructure and transport access. Inward commuting patterns across the GM boundary have shown that the largest flows are from areas to the south and east of GM. There are strong links between Stockport and Cheshire East and Stockport and High Peak. For example, Census 2011 data shows that over 23,000 people commute into Greater Manchester each day from Cheshire East, with the vast

majority of those movements being by car or van and five times as many people commute into work from High Peak to work in GM as commuted from Preston (See New Economy, Briefing 36, "Travel to Work Patterns in Greater Manchester":[http://www.neweconomymanchester.com/media/1078/tne\\_travel\\_to\\_work\\_patterns\\_in\\_greater\\_manchester.pdf](http://www.neweconomymanchester.com/media/1078/tne_travel_to_work_patterns_in_greater_manchester.pdf) ).

The strategic road network in these areas is already highly congested with key corridor routes experiencing very significant peak time delays, long journey times and air quality issues already being evidenced in parts of the Borough. The A34 and the A6 are the key corridors likely to be accessed by those commuting in from Cheshire East and High Peak. The recent South East Manchester Multi-Modal Study (SEMMMS) Refresh highlighted that the A34 is already highly congested with the route predicted to get busier with worsened conditions. This route includes the Gatley Junction which has recorded air pollution and air quality exceedances. From High Peak, commuters use the A6 which is frequently cited as one of the most congested roads in the country and the SEMMMS refresh notes that the new A6MARRR will increase traffic levels in the area by around 15%. There is already anecdotal evidence to suggest that congestion and journey times in High Lane have significantly worsened recently.

In particular the GMSF proposals to site nearly 3000 new dwellings and all the additional cars that come with this at key points to the south east and south west of the Borough, including at semi-rural locations with poor public transport links, are likely to exacerbate serious traffic flow, congestion and air quality issues on the key route corridors, the A34 and the A6. The plans by Cheshire East Council (CEC) to location 1,500 homes plus reserved land for additional housing against Stockport's border will impact the A34 even further. The current position of CEC that they have a 10 year window to address this issue is untenable, yet the GMSF is silent on this matter and its neighbour's plans.

### **Specific Allocations**

#### **Bredbury Park Extension. Policy GM Allocation 34.**

The proposal is to designate the area adjacent to the current Bredbury Industrial Park as employment land.

Stockport Conservative Group note that this proposal forms an extension to a large and successful employment site and that this would potentially offer considerable employment opportunities close to a Priority 1 area.

The Conservative Group note that a considerable amount of work would be needed to bring forward this site and could not support the allocation without considerable prior transport interventions and infrastructure provision. There is currently considerable traffic congestion in the area at peak times. As a minimum the site would need a Metrolink stop, resolution of access issues including the height of the nearby railway bridge, highways mitigation works and roundabout improvements. It is regrettable that there are no transport infrastructure schemes which improve the viability of this site and the immediate vicinity which are currently committed or can be guaranteed.

It is regrettable that the site allocation statement does not provide with it a summary of the character, landscape, wider environment and current uses of this site so that the public can more clearly assess the value of land being proposed for release against the proposed use.

### **Former Offerton High School. Policy Allocation 35.**

The proposal is for around 250 homes with a minimum of 40% affordable housing and across a range of types. The site development requirements include masterplanning and phasing to support infrastructure (drainage, utilities, green infrastructure, broadband and EV charging point), two access points and suitable junction improvement, comprehensive traffic calming on estate roads, highways mitigation, improvements in public transport, EV charging infrastructure, high quality design, landscaping and green infrastructure, protection of biodiversity interests, an appropriate contribution to community facilities, to provide additional SEND places, contribute towards additional school places and health provision generated by the development.

The Conservative Group welcome the recognition that this level of proposal would require provision of additional community facilities and an uplift in the local school and health provision from the increased demand created as well as significant local transport interventions. This site is reasonably well located in terms of proximity to public transport access but again we would raise concerns at concerns about the additional traffic movements likely to be generated which will ultimately likely contribute to further congestion on Marple Road.

We would wish to see delivery of a Marple to Stockport fixed rail link to support this and other proposals on this side of the Borough in order to make development sustainable, mitigate the very significant additional traffic generation and facilitate access to employment, skills, training and leisure opportunities.

**Gravel Bank Road/ Unity Mill. Policy Allocation GM 36.**

The proposal is for around 250 homes with a broad mix of types, including apartments within Unity Mill, 30% affordable housing, provision for older person's affordable accommodation and custom self-build.

Again, we welcome the recognition of the need to contribute towards school, health and community infrastructure provision. We also recognise that this site is close to Woodley local centre and rail links. However, we would raise concerns about the number of additional traffic movements through what appear to be quite limited access plans. It remains to be seen whether current modifications to the A556 will be effective in relieving already existing congestion in Woodley and the surrounding area.

**Heald Green Policy GM Allocation 37 and Griffin Farm, Stanley Green. GM Allocation 40.**

These proposals are for 850 homes on each site, a mix of type with higher densities around transport access points. The Policy Allocations highlight that the site has multiple and very significant development requirements attached to it across transport infrastructure, access, highways, visual, landscape, design, biodiversity and green infrastructure, open space, improved community facilities, delivery of a new local centre and increased demand for school places and health services requiring contributions, and mitigation measures on all dwellings and buildings at the Heald Green location to address noise pollution resulting from Manchester Airport.

Stockport Conservative Group remain extremely concerned about the Heald Green GM Allocation 37 proposed allocation, which cannot be seen in isolation from Policy GM Allocation 40, Griffin Farm, Stanley Green.

Although the Heald Green proposal represents a reduction on the previously proposed quantum of development in the area, it still represent a serious threat to the overall character of the area and the continued recognition of Heald Green as a village in its own right. There are very serious questions and

concerns over the long term sustainability of the proposals for Heald Green and Griffin Farm, Stanley Green when viewed together as they should be.

The Heald Green allocation site is located adjacent to railway line, has a major road to the South and Manchester Airport to the West. GMSF notes that mitigation measures will be necessary to address the noise pollution these dwellings will be subject to as a result of flights to and from Manchester Airport. We have concerns about the sustainability of the site in terms of quality of life, air and noise pollution and the continuous sprawl of development that could arise when the Heald Green proposal is viewed together with the established surrounding settlement to the north, the Stanley Green Allocation, the Woodford Allocation and the Handforth Garden Village just across the border in Cheshire East.

When viewed together with the Griffin Farm, Stanley Green proposal this places 1,700 homes or nearly half of all proposed Green Belt Development in the Borough into one ward of Stockport.

The Stanley Green Allocation is a large Green Belt site of undeveloped agricultural land bounded by native hedgerows. There is a Grade II listed building within the allocation site and the land has added value in the contribution it makes to this heritage asset and its setting. The allocation site forms a generous area of land which serves as a natural break and a clear green demarcation separating the distinct local communities of Heald Green, Handforth and Cheadle Hulme. These communities are currently separate with their own identities. The combined scale of development proposed at Heald Green raises real concerns that these areas will become merged into a large housing estate devoid of character and generating a high level infrastructure demand. This will add to the already severe problems on the A34 and while we are pleased to see a railway station suggested for Stanley Green we are very concerned about the impact of this scale of housing before the more strategic transport and infrastructure solutions are likely to be delivered toward the end of plan period.

### **High Lane. GM Policy Allocation 38.**

The proposal is for around 500 homes with significant requirements across affordable housing, housing type, design, visual and landscaping, highways mitigation, public transport, open space and green infrastructure, contribution

toward additional demand for school places and health provision and community facilities.

The site is problematic and we would raise serious concerns about the proposals for an additional 500 homes in a small, locally distinct, characterful community in a semi-rural location in Stockport Borough. As per the above section on overall Stockport site selection, the Conservative Group note that High Lane sits close to the border with Derbyshire and that this is a key route into Stockport and one of the busier commuter routes into the GM conurbation. As the location is semi-rural leading to rural, the majority of commuting journeys are made by car. This is an already heavily congested area at peak times, with slow peak time speeds, high journey times and volumes of traffic reported to be worsening. Concerns have recently been raised over air quality in the area. GMSF states that the “proportion of households with two or more cars is now at its highest ever at 33%”. This is particularly likely to be the case in rural and semi-rural locations, such as this, with limited local employment opportunities meaning high levels of commuter journeys. Adding between 500 – 1000 cars and two additional junctions to the A6 at this location is likely to have considerable impact on traffic, congestion, journey times and air quality. This proposal does not contribute to the GMSF objectives of creating sustainable communities, minimising the need to travel and protecting the distinct character of local communities.

The transport and highways proposals put forward with the site allocation as development requirements do not adequately address the transport requirements and problems likely to be generated by this site and arguably contribute more issues to the local highways network than they resolve (the addition of additional junctions and stop start traffic on the A6). The public transport suggestions GMSF suggests for the site are inadequate. To suggest that a higher quality bus stop is going to impact on public transport usage and address the generation of additional car movements from 500 dwellings is little short of insulting. GMSF suggests “possible” development of a new station at High Lane. There is no commitment against this possible development, no funding and no agreement with partner bodies and no guarantee it will ever be delivered. The cycle and walkway enhancements in this location are more likely to be used for leisure than for commuting purposes and therefore do not significantly contribute to the sustainability of this development proposal in terms of the ability to access employment, skills and training.



The level of social infrastructure provision required – education places and health – by this development is likely to be high given the size of the development proportionate to the existing community, education, health and social care facilities in the area.

The quantum of development being proposed for High Lane is disproportionate for a village and the housing density set out by the GMSF most likely to apply to this site is significantly higher than the current pattern or development in High Lane. The Conservative Group are therefore concerned that the density and number of dwellings will impact detrimentally on the historic and distinct character of the village.

In addition to this, the Conservative Group note that this Green Belt allocation for housing puts forward a site of high quality farming/ agricultural land.

#### **Hyde Bank Meadows. Policy GM Allocation 39.**

The proposal is for 250 homes.

Stockport Conservative Group would highlight the significant access problems associated with this site. Gotherage Lane is not a suitable and sustainable access route for this proposal (as currently suggested). This would put considerable additional traffic through a highly residential area of small local roads and streets and would be to the detriment of the Cherry Tree Estate and its current residents. Significant additional social infrastructure would be needed, a number of local schools are already full and additional GP and dental provision would be required.

While we recognise that this proposal is close to Romiley District Centre, train and bus links again require improvement and connectivity could benefit from a fixed Marple to Stockport fixed rail. There is traffic congestion in the area and the proposed mitigations do not go far enough.

#### **Woodford Aerodrome. Policy GM Allocation 41.**

Stockport Conservative Group are relieved to see that this draft of the GMSF has reduced the size of development proposed for Woodford. Although there is a welcome reduction in housing numbers, Stockport Conservative Group remain concerned that the scale of the proposal and quantum of housing is too

large. When taken with the approximately 950 homes already permissioned and being built next door, this makes a total new settlement size of 1,650 new dwellings.

The historic village of Woodford as a settlement dates back to the 13<sup>th</sup> Century. It consists of farm land, woodland and a residential settlement.

Rich in agricultural land it supports a vast and varied ecological system and its geology means that parts are subject to seasonal flooding. This is a semi-rural location which currently has local habitats supporting a rich and diverse wildlife in its ponds, fields and woodland.

Along with the development already underway, the GMSF proposal would dwarf and completely swallow up the historic village of Woodford. The GMSF strategic policies on housing and a greener Greater Manchester outline objectives to maintain local distinctiveness and protect cultural heritage and distinct settlements as well as public rights of ways and views. This proposal does not align with those objectives as a further release of greenbelt land here will change the character of the area, resulting in the loss of a distinct rural community, landscape and the valuable wide expansive views out towards the Cheshire Plain.

We would also raise concerns about overdevelopment and urban sprawl. The proposed allocation site for Woodford is located at the border with Cheshire East. No account seems to have been taken of the very significant levels of housing development proposed just over the border into Cheshire East. For example, the nearby Handforth Garden Village development of around 1,500 homes. The scale of development of both the Woodford Aerodrome GM Allocation 41 and other development in the area (Cheshire East, Handforth and Stanley Green) is likely to generate very significant demand on local infrastructure both in terms of transport and social infrastructure such as schools and health provision. The GMSF does not adequately explain how this demand will be met.

We welcome the proposal for a new or improved Community Centre and the proposed new school size to be increased to a two form entry.

While we welcome the Bus Rapid Transit proposals, the location means that most people will remain reliant on cars. Bus routes and frequencies are currently poor from this location. There is no railway station serving this new community, with the nearest stations likely to be a couple of miles away. As

previously stated local roads and the strategic road network in this area are already frequently gridlocked with air quality concerns. Whilst the SEMMMs project is designed to alleviate the present congestion, it is not designed to create further capacity for further developments of this scale.

There is limited social infrastructure associated with this proposal and the GMSF does not adequately explain how the necessary school places and health care provision will be provided for development on this scale. How will the thousands of new families in Woodford and just over the border in Cheshire East be accommodated with just one additional form of primary school entry proposed?

### **Conclusion and Recommendations**

Stockport Conservative Group welcomes the opportunity to engage with GMSF and recognises the importance of planning sustainably for growth. As local Councillors we remain concerned about the GMSF as it currently stands. There remain serious questions over whether Greater Manchester and Stockport as a Borough needs the amount of housing proposed. Government targets are not mandatory and in light of this, the GMSF proposals for around 25% of Stockport's housing target to be delivered from Green Belt site appear regrettably high.

Many residents in our wards remain concerned about the permanent loss of valued green belt land and the creation of urban sprawl – particularly in Heald Green Ward and the village of Woodford. Residents' value living in distinct local communities and the proposals for large scale development here do not appear in keeping with the GMSF ambitions to protect heritage and local identity and distinctiveness.

We welcome the overall reduction in housing numbers and greenbelt sites, but remain concerned about the impact and sustainability of the proposals. Likewise, we welcome the acknowledgement of the need for infrastructure provision and the identification of some specific proposed interventions alongside site allocation. However, it is not clear that these infrastructure proposals can or will be brought forward or, in some cases, that they go far enough. On transport, there are very few strategic interventions outlined which have approval, funding committed and will progress within the next five year and will support the growth at the green belt sites proposed. Similarly, it

appears that many of the infrastructure proposals and improvements would likely be back loaded towards the end of the plan period. We remain very concerned about the potential impact of this many homes being built before infrastructure is delivered.

We are also disappointed that GMSF appears to take little or no account of the scale of housebuilding in Cheshire East on the border of Stockport which will exacerbate infrastructure demand, traffic congestion levels and issues of urban sprawl and merger of communities.

Many residents have expressed concerns about how school places, GP and dental services will be provided. As local Councillors, we remain concerned about how these facilities and services will be provided when demand is already high in many areas and some services already at capacity.

We recommend:

- Consideration of changing to a 15 year plan period to remove the need to release Green Belt;
- That the final GMSF incorporates a commitment to the principle that decisions to make changes to boundary of the green belt should be made by the relevant district local authority and not at GM level;
- That the search for brownfield sites should continue with an open call for sites;
- That the delayed SEMMMS refresh be completed and published;
- That further consideration is given to the impact of development plans in Cheshire East near the boundary with Stockport Local Authority area taken together with the GMSF proposals. That the impact of these developments on local communities, urban sprawl, severe traffic generation and congestion and infrastructure demand (transport, education and health in particular) is assessed with a view to adjusting plans and comprehensive mitigation;
- That plans for Stockport Town Centre (including under main Town Centres GM-Strat 12) focus on high quality design of housing recognising that high densities make good design essential to quality of life and sustainable communities where people are living closely to each other;
- That plans for Stockport Town Centre housing ensure that delivery of housing units are contingent on delivery of social (health and education)

and environmental infrastructural with green and recreational space built into plans;

- That sites are not brought forward for approval until an infrastructure plan has been approved and resources allocated;
- That any final GMSF plan including proposed site allocations in the Green Belt should include a summary of the character, landscape, wider environment and current uses of that site alongside the individual site proposals;
- That there is further exploration of delivering a Stockport to Marple fixed rail link;
- That the planned merger of the communities of Heald Green, Stanley Green, Handforth and Cheadle Hulme are reconsidered to maintain those communities independent identity and status;
- That plans which create urban sprawl are abandoned;
- That, should the proposed site allocations at Heald Green and Griffin Farm (GM Allocation 37 & 40) be approved, housing land is not released until the approval of and timescales agreement of a new Stanley Green railway station; 30% on site deliverable affordable housing is demonstrated; significant contributions towards transport improvements and educational provision are secured and impact on the Grade II listed building Griffin Farm is fully assessed and a plan for mitigation is approved. Housing delivery should also be phased and contingent on infrastructure delivery;
- That the current proposal for Woodford Aerodrome, GM Allocation 41, is revisited with a view to significantly reducing or removing the proposals from the GMSF in light of the cumulative impact of development in the area and the detrimental effect to the character of the distinct local communities and on current residents;
- That, should any final allocation go forward for Woodford Aerodrome, that this should have pre-agreed community benefits with tied in time scales for delivery, that public transport provision is reassessed and that housing is phased and contingent on delivery of infrastructure.

In conclusion, whilst this GMSF represents an improvement we still raise real concerns regarding housing projections, the proposed site allocations in the Green Belt and ability to deliver the necessary infrastructure to support this scale of proposed development and to deliver at pace.