



Woodford Neighbourhood Forum

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Representation to Places for Everyone on behalf of Woodford Neighbourhood Forum

Introduction

Woodford is a settlement located on the southern boundary of the Metropolitan Borough of Stockport in Greater Manchester, bordering Cheshire. As neighbours of the Greater Manchester area covered by the Joint Development Plan for the nine participating local authorities, Woodford residents will be impacted by proposals in Places for Everyone.

Woodford Neighbourhood Forum (WNF) was designated by Stockport Council in 2013 and has prepared the Woodford Neighbourhood Plan. Following a successful referendum result, the Woodford Neighbourhood Plan became part of Stockport Borough Development Plan in September 2019.

The WNF management Committee has approved the following comments on Places for Everyone.

1. Not Legally Compliant to proceed to Regulation 19

We have concerns that it is not appropriate to proceed to Regulation 19 Consultation and Examination because the Places for Everyone plan will not have substantially the same effect as GMSF2020 for a number of reasons, including the following:

- A new committee in GMCA was set up to take the new plan forward, so the overseeing body is now different.
- Significant changes to the content of the plan have been necessary following the departure of Stockport Council from GMSF.
- Changes have been required due to the 35% increase in housing numbers for Manchester City Council.
- The evidence documents have required significant updating.
- The Covid pandemic and Brexit have resulted in changes in society and commerce, which may be long term with regard to requirements for housing, commercial premises and brownfield land supply. The PfE document acknowledges this in the

statement: “.. it is recognised that the country is still in a state of flux”. These factors will change the effect of the plan.

- If PfE 2021 genuinely addresses the changes that have occurred since GMSF 2020 was drafted, as it claims, then it would indeed need to have a substantially different effect and so, by its own criteria, would need another round of Regulation 18 consultation.

Modification requested

The Examination should not proceed and the PfE plan should go through a Regulation 18 Consultation.

2. Not legally compliant with regard to the Duty to cooperate with Stockport Council

The Statement of Common Ground dated August 2021 states that Stockport Council had not yet identified any unmet need. Similarly, paragraph 8.4 in the PfE 2021 Growth and Spatial Options Paper notes that an adjustment, based on the 2021 OAN for Stockport has been made to the figure originally assessed as part of the GMSF 2020 preparation, to take account of Stockport’s withdrawal from the Plan and that a potential alternative/addition to this option could have been to propose to meet some of Stockport’s need in the PfE Plan area. It also notes that *“Given the embryonic stage reached in the preparation of Stockport’s local plan, Stockport Council has not currently established whether or not it will have any surplus/unmet need and if so, what alternatives it has considered for meeting this unmet need. Therefore, it is not possible to identify what such an option might look like in relation to the PfE 2021 and consequently it is not considered to be a reasonable alternative to the proposed growth in PfE 2021.”*

In July 2021, Stockport Council announced that using the Government’s standard methodology for calculating housing need produces a figure of 18,581 from 2021 to 2038. A supply of sites for 11,097 dwellings has been identified in the latest assessments, meaning that there is a shortfall of sites for 7,484 dwellings. In GMSF some of Stockport’s housing need was to be met by other boroughs in GM. The Stockport Local Plan is expected to undergo Regulation 18 consultation in autumn 2021, while PfE is currently undergoing Regulation 19 consultation with the result that the two plans are out of step. It seems highly likely from the published data, that Stockport Council will have an unmet housing need. We also understand that Stockport Council enquired in March 2021 whether the other nine districts in GM were willing to accommodate some of Stockport Council’s housing and employment need in PfE, as had been proposed in the former GMSF plan. The published draft of PfE does not make any allowance to accommodate any of Stockport’s unmet need. Therefore, we believe that the opportunity for the nine boroughs in PfE to share some of

Stockport's housing need has not been adequately explored and the Duty to Cooperate has not been fulfilled.

Modification requested

The plan should be withdrawn from the Examination so that further discussions about meeting Stockport Council's unmet housing needs can take place.

3. Early stages of public consultation in 2014 and 2015 were inadequate in reaching a representative audience and evaluating alternative options.

Re: Places for Everyone, page 19, paragraph 1.60

States that *"Four consultations have taken place in relation to the GMSF. The first, in November 2014 was on the scope of the plan and our initial evidence base, the second in November 2015, was on the vision, strategy and strategic growth options, and the third, on a Draft Plan in October 2016."*

Comments

In 2015, a consultation was undertaken entitled GREATER MANCHESTER SPATIAL FRAMEWORK, Strategic Options Consultation November 2015. The document is attached. It transpired that very few residents and residents' organisations were aware of this consultation.

The report entitled GMSF Winter 2015/16 Consultation, Summary of Responses Received, dated October 2016, is also attached. The report states that:

"1.2. Over 180 responses to the consultation were received (just over 140 to the options paper 40 to the background papers). Just under 25% of responses were made online (i.e. through the Objective system) and the majority of the rest by email. A full list of the organisations who responded to the consultation is provided in Appendix A."

"11.2 There were 41 direct responses to the question on preferred options (question 9). Of these responses almost half preferred Option 3 and just under 20% (8 responders) preferred Option 1. There are a number of common issues put forward that relate to all the options."

Details of the consultation responses were posted online initially and subsequently taken off line. In response to a FOI to GMCA, a spreadsheet was supplied showing numbers of respondents to the options question. This spreadsheet is attached and shows 58 respondents, 4 of which did not select an option preference and 5 of which selected more than one option. It is not clear how this spreadsheet relates to the numbers presented in the report and we were not sent the full details of the consultation responses.

We note that out of a population of 2.7 million in Greater Manchester at the time, the numbers of respondents are extremely small and many of them represented housing development companies. The report suggests that the views of developers were

given greater weight than those of residents in the analysis of the results. Therefore, key decisions were made based on responses from an extremely small and unrepresentative sample of people.

The current Regulation 19 consultation on the PfE plan has been better advertised and notices have been posted on lampposts around the region. No such widespread, accessible publicity was under taken for a key early stage in the development of GMSF/PfE, which is an optimal stage for public involvement so that they have a say in how their region develops.

In addition, it is six years since this consultation took place so the eligible population will now be very different and young people who will be affected by the impact of the plan for a large proportion of their lives had no opportunity for a say in it.

We believe that the early stages of consultation on the plan were flawed and now too far out of date to be relevant. Therefore, the plan is unsound.

Modification requested

The plan should be withdrawn from the Examination so that full and transparent public engagement can take place with a wide cross section of the public on the impact of different options for the plan in the changed world we now live in.

4. Vision and Objectives

The vision is good, but the highest priority should be to address climate change and the environment.

Some of the objectives are good, but there is internal contradiction between some of them. For example expansion of Manchester airport in objective 4 and allocations on Green Belt are not compliant with objective 7. Aspects of the plan do not comply with the vision, objectives or national policy.

An important objective to address the needs of the rural economy is missing.

Missing Objective

There is a missing Objective. In a region that is over 40% Green Belt, the plan fails to address the needs of the rural economy and rural communities.

Objective 1: there are concerns about consistency and validity of calculations

Re: Places for Home, Places for Everyone, page 133, paragraphs 7.1 to 8.0

Comments

There is significant concern about the consistency and validity of the calculations of housing need and supply and the resulting proposals among erudite residents and planning professionals. Put very simply it would appear that there is sufficient land supply (enough for 170,000 homes) to meet the predicted need as calculated using the Government's

standard methodology (164,881 homes) over the plan period. It appears that a very high buffer has been added to provide flexibility.

There is also significant uncertainty about housing needs, patterns of work and economic growth in the future following the Covid pandemic, Brexit and the urgent need to adapt to climate change. The PfE plan itself states: “... it is recognised that the country is still in a state of flux”.

Given these uncertainties, we suggest that exceptional circumstances do not exist to release Green Belt at the start of the plan period. Much greater flexibility is required in order to avoid unnecessary release of Green Belt land.

We suggest that no Green Belt is released until it has been shown to be required and that this is reviewed every 5 years at the plan review stages. This would still ensure a 5-year housing land supply and would allow a brownfield first policy to be pursued.

An alternative route would be to avoid allocation of sites in PfE and to leave this task to each of the nine individual authorities to tackle in their individual local plans.

Objective 3: does not include the rural economy.

The plan fails to meet the needs of all parts of a very diverse region

Re: Places for Everyone, Page 40, Objective 3: Playing our part in ensuring a thriving and productive economy in all parts of Greater Manchester.

Comments

As currently written, the PfE plan addresses the needs of a so-called “city region”. However, Greater Manchester is much more than a “city” region. It is a very diverse region, which includes cities, town, villages, hamlets, farmland of a range of types, hills, valleys, lakes, waterways, moorland and peat bogs. Many residents live and work in rural communities and depend on the rural economy. They do not identify as being part of a city and their needs have been overlooked in this plan. In order to comprehensively address the needs of the region, a joint Local Plan should support a prosperous rural economy and sustainable growth of rural businesses; promote the development and diversification of agricultural businesses; support sustainable rural tourism and leisure developments, and support local services and facilities. We note that the relevant figure to consider in respect of Green Belt loss is the gross figure, because new Green Belt additions proposed in PfE were already green sites.

Paragraph 1.51 on page 19 of Places for Everyone states: “The nine boroughs cover some 115,084 hectares, almost half (46.7%) is designated as Green Belt.” In spite of this recognition that a large proportion of the borough is green space, the PfE plan completely fails to address the needs of rural communities. Loss of Green Belt and green field land will have a direct negative impact on the rural economy, effectively representing loss of “business space”. It has not been positively prepared and is therefore unsound.

Objective 4 is not consistent with Objective 7: Playing our part in ensuring that Greater Manchester is a more resilient and carbon neutral city-region and the national policies that require that Local Plans address the need for mitigation of climate change.

Objective 7: The plan does not meet the requirements for sustainable development
Re: Places for Everyone, Page 41, Objective 7: Playing our part in ensuring that Greater Manchester is a more resilient and carbon neutral city-region.

Comments

Land is an increasingly precious resource with competing demands for housing, commercial buildings, transport, carbon sequestration, food production, rural jobs, energy production, water storage, water absorption and recreation.

In order to comply with the statutory duty to include policies designed to tackle climate change and its impacts and in order to provide sustainable development, the plan for GM will need to give the appropriate weight to all those needs. As well as outlining the benefits of the provision of housing, employment land and transport, the plan and supporting documents need to provide careful evaluation of the precise impact of the proposals on:

- Increased carbon emissions and air pollution due to increased urbanisation.
- Effects of transport proposals on carbon emissions and air pollution.
- Opportunities for improved carbon sequestration via amended practices in agriculture, forestry and moorland and peat bog management.
- Opportunities for alternative energy production from green field and Green Belt sites.
- Effect of the proposal on the rural economy, rural jobs and the ability to produce local food.
- The impact of loss of green space on the mental and physical health of residents and the resultant cost of increased needs for health care.

While the use of green field and Green Belt sites may provide an easy route for providing additional housing, commercial space and transport routes, by definition it also removes this land from opportunities to mitigate negative impacts of population growth, urbanisation and climate change. Residents in the wider region, including Woodford, and the country as a whole will suffer from negative impacts on the factors outlined above.

We refer to the representation by Mark Burton of Steady State Manchester, which includes detailed assessment of land uses and the impact on carbon emissions and human health, as examples of the type of analysis that needs to be conducted.

We highlight as particularly unsustainable proposals for allocations which will destroy peat mosses, such as Carrington Moss and others.

Without a full, detailed evaluation, including proposals for mitigation of any negative impacts, the plan is unsound because it cannot be determined to be consistent with national

policies in enabling the delivery of sustainable development, or compliant with national policies on climate change.

Objective 10: This is a laudable objective, but insufficient weight has been given in the plan to the negative impact of loss of green field and Green Belt land on the health and well-being of current and future residents.

Modifications requested

The plan should be revised to include objectives and policies which support rural communities and the rural economy. These aspects should be given more weight in the decisions on any potential loss of green field and Green Belt land.

The plan should be revised to remove inherent contradictions between objectives with regard to sustainability and net zero carbon targets.

5. The plan does not meet the requirements for sustainable development

Re: Places for Everyone, Page 41, Objective 7: Playing our part in ensuring that Greater Manchester is a more resilient and carbon neutral city-region.

Comments

Land is an increasingly precious resource with competing demands for housing, commercial buildings, transport, carbon sequestration, food production, rural jobs, energy production, water storage, water absorption and recreation.

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We highlight as particularly unsustainable proposals for allocations which will destroy peat mosses, such as Carrington Moss and others.

Without a full, detailed evaluation, including proposals for mitigation of any negative impacts, the plan is unsound because it cannot be determined to be consistent with national policies in enabling the delivery of sustainable development, or compliant with national policies on climate change.

Modifications requested

The impacts of changes in land uses on human health and carbon emissions should be fully and professionally evaluated. These aspects should be given more weight in the decisions on any potential loss of green field and Green Belt land and the plan should be rewritten accordingly, in order to comply with national legislation.

6. The plan fails to meet the needs of all parts of a very diverse region

Re: Places for Everyone, Page 40, Objective 3: Playing our part in ensuring a thriving and productive economy in all parts of Greater Manchester.

Comments

As currently written, the PfE plan addresses the needs of a so-called “city region”. However, Greater Manchester is much more than a “city” region. It is a very diverse region, which includes cities, towns, villages, hamlets, farmland of a range of types, hills, valleys, lakes, waterways, moorland and peat bogs. Many residents live and work in rural communities and depend on the rural economy. They do not identify as being part of a city and their needs have been overlooked in this plan. In order to comprehensively address the needs of the region, a joint Local Plan should support a prosperous rural economy and sustainable growth of rural businesses; promote the development and diversification of agricultural businesses; support sustainable rural tourism and leisure developments, and support local services and facilities. We note that the relevant figure to consider in respect of Green Belt loss is the gross figure, because new Green Belt additions proposed in PfE were already green sites.

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Modification requested

The plan should be revised to include objectives and policies which support rural communities and the rural economy. These aspects should be given more weight in the decisions on any potential loss of green field and Green Belt land.

7. Places for Home, Places for Everyone, page 133, paragraphs 7.1 to 8.0

Comments

There is significant concern about the consistency and validity of the calculations of housing need and supply and the resulting proposals among erudite residents and planning professionals. Put very simply it would appear that there is sufficient land supply (enough for 170,000 homes) to meet the predicted need as calculated using the Government’s standard methodology (164,881 homes) over the plan period. It appears that a very high buffer has been added to provide flexibility.

There is also significant uncertainty about housing needs, patterns of work and economic growth in the future following the Covid pandemic, Brexit and the urgent need to adapt to climate change. The PfE plan itself states: “.. *it is recognised that the country is still in a state of flux*”.

Given these uncertainties, we suggest that exceptional circumstances do not exist to release Green Belt at the start of the plan period. Much greater flexibility is required in order to avoid unnecessary release of Green Belt land.

We suggest that no Green Belt is released until it has been shown to be required and that this is reviewed every 5 years at the plan review stages. This would still ensure a 5-year housing land supply and would allow a brownfield first policy to be pursued.

An alternative route would be to avoid allocation of sites in PfE and to leave this task to each of the nine individual authorities to tackle in their individual local plans.

Modifications requested

The plan should be revised such that no Green Belt is released at the start of the plan period and only released if required at review every 5 years, allowing implementation of a brownfield first policy.

8. Policy JP-H 1 Scale, Distribution and Phasing of New Housing Development, page 141

Comments

The Government's Standard Method is based on Office of National Statistics 2014 population data and aims to achieve 300,000 new homes per year, but more up to date population data show substantially reduced needs.

When asked about the need to use the figures produced by the standard methodology, Government Housing Ministers have replied that it is just a starting point and it is for Local Authorities to decide on the right figure for their authority.

The unmet needs of the Stockport Borough are not addressed.

Given the high level of uncertainty about future needs, the importance of green field and Green Belt land for uses which mitigate climate change and the level of opposition among residents to loss of green spaces, it would seem more prudent to avoid any release of Green Belt at the start of the plan period, but to review the plan every 5 years and only release if it is necessary.

Modification requested

Stockport Council has identified an unmet need which should be addressed under the Duty to Cooperate.

This policy should be amended such that no Green Belt is released at the start of the plan period and only released if required at review every 5 years, allowing implementation of a brownfield first policy.

9. Policy JP-S 1: Sustainable Development, Places for Everyone , page 85

Comments

WNF supports the principles expressed in Policy JP-S 1 Sustainable Development and the ambition to bring forward previously developed sites for development effectively and to address mitigation and remediation issues. We support the principle of preference being given to using previously-developed (brownfield) land and vacant buildings to meet development needs.

Development on green field and Green Belt sites is at odds with the following objectives in PfE:

Objective 7: Playing our part in ensuring that Greater Manchester is a more resilient and carbon neutral city-region.

Objective 8: Improve the quality of our natural environment and access to green spaces.

Objective 10: Promote the health and wellbeing of communities.

Removal of green spaces from the current crucial role, and future potentially enhanced role, in carbon absorption, the natural environment and in the health and well-being of communities is intrinsically unsustainable. We highlight as particularly unsustainable proposals for allocations which will destroy peat mosses, such as Carrington Moss and others.

The inclusion of green field and Green Belt sites for development at the outset of the plan is also at odds with the brownfield first principle. It is not justified or sustainable and therefore unsound.

Modifications requested

This policy should be amended such that no Green Belt is released at the start of the plan period and only released if required at review every 5 years, allowing implementation of a brownfield first policy.

10. Carbon and energy: JP-S 2

Comments

WNF supports the aims in this policy, but it is not clear that the measures will offset the negative impacts on carbon emissions of other parts of the plan.

Without a full, detailed evaluation, including proposals for mitigation of any negative impacts, the plan is unsound because it cannot be determined to be consistent with national policies in enabling the delivery of sustainable development, or compliant with national policies on climate change.

11. Flood risk and the water environment: Policy JP-S 5

Comments

WNF supports measures to address the current and likely future increases in river and surface flooding. We have experienced increased problems with surface flooding here in Woodford over recent years which may herald future problems due to increased intensity of rainfall expected with climate change.

12. Clean Air Policy JP-S 6

Comments

WNF supports measures to improve air quality. We are downwind from Manchester Airport in the prevailing westerly winds and suffer from the smell of air pollution from aviation fuel. We can smell it and even taste it on a bad day, which suggests that levels are high.

13. Resource efficiency Policy JP-S 7

Comments

WNF supports improvements in recycling.

14. Supporting long-term economic growth Policy JP-J 1

Comments

WNF supports economic prosperity, but notes that the rural economy has been completely omitted from this policy.

In addition, we are in a period of uncertainty about future trends in economic activity and entering a period during which we need to do things differently to avoid exacerbating climate change. Flexibility will be needed. Jobs in the green economy should be encouraged.

Old style economic activity should not be over-weighted in this plan.

Modifications requested

The policy should address the rural economy.

Jobs in the green sector should be encouraged.

The potential negative impacts of planning for excess growth should be given more weight.

15. Scale, Distribution and Phasing of New Housing Development Policy JP-H 1

Comments

The Government's Standard Method is based on Office of National Statistics 2014 population data and aims to achieve 300,000 new homes per year, but more up to date population data show substantially reduced needs.

When asked about the need to use the figures produced by the standard methodology, Government Housing Ministers have replied that it is just a starting point and it is for Local Authorities to decide on the right figure for their authority.

Given the high level of uncertainty about future needs, the importance of green field and Green Belt land for uses which mitigate climate change and the level of opposition among residents to loss of green spaces, it would seem more prudent to avoid any release of Green Belt at the start of the plan period, but to review the plan every 5 years and only release if it is necessary.

Modification requested

This policy should be amended such that no Green Belt is released at the start of the plan period and only released if required at review every 5 years, allowing implementation of a brownfield first policy.

16. Affordability of new housing Policy JP-H 2

Comments

WNF supports the provision of more social housing and affordable housing. Many experts have been saying for some time that there is not a shortage of market housing, prices are high because interest rates are low and increasing supply will not bring prices down. It is not clear that PfE will produce the quantities of social housing and affordable housing that are needed. An alternative mechanism is needed to supplement, or replace, the current method of heavy reliance of inclusion of a proportion of affordable housing in new housing developments. There are too many ways for this obligation to be avoided and it does not necessarily produce affordable housing in sustainable locations.

Modification requested

More clarity is needed on how the plan will produce the levels of social housing and affordable housing that is needed.

17. Valuing important landscapes Policy JP-G 1

Comments

WNF supports the aim that development should reflect and respond to the special qualities and sensitivities of the key landscape characteristics of its location.

18. Policy JP-Strat 13: Strategic Green Infrastructure, page 80

Comments

WNF supports the principles expressed in Policy JP-Strat 13: Strategic Green Infrastructure and we welcome the protection and enhancement of strategic green infrastructure assets.

19. Green infrastructure network Policy JP-G 2

Comments

WNF supports the principles behind this policy. CPRE have pointed out the importance of hedgerows in green infrastructure. We would strongly support this addition to the policy because hedgerows provide a carbon sink, habitats and corridors for wildlife and are a key feature of our landscape. Some of our mixed species hedgerows are hundreds of years old.

Modification requested

Please add hedgerows to the policy.

20. River valleys and waterways Policy JP-G 3

Comments

WNF supports the principles behind this policy. Blue infrastructure is a very important component of the natural landscape, providing habitats and corridors for wildlife and valuable opportunities for outdoor recreation for residents.

21. Lowland wetlands and mosslands Policy JP-G 4

Comments

WNF supports the principles behind this policy. Lowlands, wetlands and mosses are very important ecologically.

The proposed development on mosses, such as Carrington, is completely at odds with this policy.

22. Uplands Policy JP-G 5

Comments

WNF supports the principles behind this policy. The upland areas of the region are one of its defining features, providing special habitats for wildlife, spectacular beauty and enormous benefits to residents from far and wide in opportunities for outdoor recreation. We support strong protection of these areas.

23. Urban green space Policy JP-G 6

Comments

WNF supports the principles behind this policy. Access to green spaces has been shown to have mental and physical health benefits.

24. Trees and woodland Policy JP-G 7

Comments

WNF supports the principles behind this policy. Woodland and trees play a very important role in carbon absorption, absorption of particulate traffic pollution, habitats for wildlife and beauty in our towns and countryside.

We support CPRE in noting that hedgerows are also very important.

Modification requested

Please add hedgerows to this policy.

25. Standards for Greener Places Policy JP-G 8

Comments

WNF supports the principles behind this policy.

26. Biodiversity Policy JP-G 9

Comments

WNF supports the principles behind this policy. This is a very specialist area and local councils need access to qualified ecologists who are not working on behalf of development companies to ensure that these aims are correctly fulfilled.

27. Green Belt Policy JP-G 10

Comments

WNF is opposed to Green Belt loss in this plan. Exceptional circumstances have not been demonstrated.

As stated in previous sections of this survey, we are opposed to the proposals for Green Belt loss because:

Land is an increasingly precious resource with competing demands for housing, commercial buildings, transport, carbon sequestration, food production, rural jobs, energy production, water storage, water absorption and recreation.

In order to comply with the statutory duty to include policies designed to tackle climate change and its impacts and in order to provide sustainable development, the plan for GM will need to give the appropriate weight to all those needs. As well as outlining the benefits of the provision of housing, employment land and transport, the plan and supporting documents need to provide careful evaluation of the precise impact of the proposals on:

- Increased carbon emissions and air pollution due to increased urbanisation.
- Effects of transport proposals on carbon emissions and air pollution.
- Opportunities for improved carbon sequestration via amended practices in agriculture, forestry and moorland and peat bog management.
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- Effect of the proposal on the rural economy, rural jobs and the ability to produce local food.
- The impact of loss of green space on the mental and physical health of residents and the resultant cost of increased needs for health care.

The plan states that over 40% of the region is currently Green Belt. That land is part of rural businesses. The effect of loss on the rural economy has not been factored into the assessment of negative impacts.

While the use of green field and Green Belt sites may provide an easy route for providing additional housing, commercial space and transport routes, by definition it also removes this land from opportunities to mitigate negative impacts of population growth, urbanisation and climate change. Residents in the wider region, including Woodford, and the country as a whole will suffer from negative impacts on the factors outlined above. Without a full, detailed evaluation, including proposals for mitigation of any negative impacts, the plan is unsound because it cannot be determined to be consistent with national policies in enabling the delivery of sustainable development, or compliant with national policies on climate change.

Development on green field and Green Belt sites is at odds with the following objectives in PfE:

Objective 7: Playing our part in ensuring that Greater Manchester is a more resilient and carbon neutral city-region.

Objective 8: Improve the quality of our natural environment and access to green spaces.

Objective 10: Promote the health and wellbeing of communities.

Removal of green spaces from the current crucial role, and future potentially enhanced role, in carbon absorption, the natural environment and in the health and well-being of

communities is intrinsically unsustainable. We highlight as particularly unsustainable proposals for allocations which will destroy peat mosses, such as Carrington Moss and others.

The inclusion of green field and Green Belt sites for development at the outset of the plan is also at odds with the brownfield first principle. It is not justified or sustainable and therefore unsound.

Modification requested

The impacts of changes in land uses on human health and carbon emissions should be fully and professionally evaluated. These aspects should be given more weight in the decisions on any potential loss of green field and Green Belt land and the plan should be rewritten accordingly, in order to comply with national legislation.

The plan should be revised to include objectives and policies which support rural communities and the rural economy. These aspects should be given more weight in the decisions on any potential loss of green field and Green Belt land.

The plan should be amended such that no Green Belt is released at the start of the plan period and only released if required at review every 5 years, allowing implementation of a brownfield first policy.

28. Safeguarded land Policy JP-G 11

Comments

The same points as for Green Belt policy apply here. There is significant uncertainty about the quantity of land that will be needed for housing and commercial development and question marks over the calculations used to determine need vs. supply. Therefore, designation of safeguarded land is unsound.

Modification requested

Safeguarded land should be removed from the plan.

29. Draft Policy JP-Strat 10 – Manchester Airport, Places for Everyone, page 73

Comments

This policy is not consistent with Objective 7: Playing our part in ensuring that Greater Manchester is a more resilient and carbon neutral city-region and the national policies that require that Local Plans address the need for mitigation of climate change.

Proposals include 500,000 sqm of office, logistics, hotel and advanced manufacturing space, 60,000 sqm of office floorspace around the new HS2 station; 1,700 new homes to the west of the M56 at Timperley Wedge

The plan proposes to allocate three sites near the airport, and makes associated changes to the Green Belt boundaries in: Policy JP Allocation 3.1 'Medipark', Policy JP Allocation 3.2

'Timperley Wedge' and Policy JP Allocation 10 'Global Logistics'.

The negative impacts of loss of Green Belt and green fields at these locations should be given greater weight in these uncertain economic times and in the light of the urgent need to address climate change. The assessment of exceptional circumstances to release Green Belt should be revisited.

The issues are relevant to Woodford residents because the totality of development in close proximity to Woodford will have a negative impact on road congestion and air quality for residents here, who already experience these problems, plus significant disturbance due to aircraft noise.

Modification requested

The plan should be revised to reduce proposals for housing and commercial space at Manchester airport and avoid further loss of green field and Green Belt sites.

30. Policy JP-C 3: Public Transport, Places for Everyone, page 222

Comments

We have noted diagrams in Transport for GM 2040 documents showing a Bus Rapid Transit route drawn as an indicative line from Manchester Airport passing through Handforth Garden Village and Woodford Garden Village to Hazel Grove. The indicative line passes through farm fields in Green Belt in Woodford and would cause significant damage to the landscape and environment as well as cutting off farms from their land. We support improved public transport links, but would like to take this opportunity to point out that there would be no justification for this route because a bus route on existing roads would perform the desired task of connecting these places by public transport. Any suggestion of a separate busway across farmland is unsustainable and therefore unsound.

Modification requested

Any reference to a Bus Rapid Transit route from Manchester Airport through Woodford should not involve any diagrams or suggestions that it would take a route other than on existing roads.

Yours faithfully,

Evelyn Frearson
Honorary Secretary
WNF

On behalf of the WNF Management Committee