

## WNF response to GMSF

### Comments on the overall strategy:

1. Support: 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.
2. Support: We support the focus on town centre regeneration and congratulate the GMCA team on the proposals for Stockport town centre.
3. 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.
4. Objection: We object to development on Green Belt land and support a brownfield first policy.
5. Objection: The GMSF is not sound in proposing development on Green Belt, green fields and countryside, which are very important for the following reasons:
  - 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.
  - 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.
  - 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.

**Solution: We ask GMCA to give these factors the highest level of importance in planning.**

6. 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.**

7. Objection: The GMSF is not effective due to absence of an effective policy 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. **Solution: We ask GMCA and Government to produce policy that can enforce brownfield first.**
8. 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. **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.**
9. 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 fully understand the good motives behind the push for economic growth, but 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.**
10. 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. 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.

**Solution:** Prepare a 15 year GMSF, which avoids the need to release any Green Belt land.

11. Objection: Large areas of warehousing proposed on Green Belt land are not justified when warehousing tends to involve a small number of low paid, low skilled jobs and generates road traffic, particularly heavy goods vehicles. **Solution: Remove warehousing allocations on Green Belt land.**
12. 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. **Solution: Ensure that none of these are overlooked and to harness the potential of residents on the ground with good local knowledge prepared to contribute to the search.**
13. 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.**

#### **Comments on allocation GM 41: Woodford Aerodrome**

1. Support: We support the removal of the proposal for Woodford in former draft GMSF (OA20). We and the majority of Woodford residents are very relieved.
2. Objection: Further large scale development in Woodford is inappropriate, but, if development proves to be essential, then the aerodrome site seems a much better suggestion.
3. Objection: Green Belt land is proposed for development. 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 proposal represents loss of Green Belt and countryside.  
**Solution: Increase density on the current Redrow site to accommodate more housing and spare Green Belt.**
4. 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 resulting total of 1,700+ new premises will overwhelm and change the character of the original village of 550 houses.  
**Solution: Reduce the housing numbers proposed.**
5. 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 radically reduced or deleted.**
6. Comment: A link to the Poynton Relief Road (PRR) would be essential for the site to be viable from a traffic and emergency access perspective and to avoid traffic chaos on Chester Road. 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. We note that, despite ambitions for public transport for the Redrow site, this has yet to materialise and residents are making trips by car.  
**Solution: No further development until a link to PRR is delivered**
7. 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.**

8. 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.**

9. 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.**