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Subject: Greater Manchester Spatial Framework Draft 2 Consultation Response

Dear Sir / Madam,

I am writing to you to respond to the second draft of the GMSF consultation. I am a local Councillor representing the ward of Marple South and High Lane in Stockport Metropolitan Borough Council and I am happy for you to publish this response after the consultation closes.

While I welcome the concept of a spatial strategy covering Greater Manchester, the area I represent as a local Councillor, Marple South and High Lane, has little in common with Greater Manchester and more in common with Poynton and Disley. Aside from that, what is contained within the Framework is vague and lacking transparency. I agree that we need to make the most effective use of the land and that more dwellings are needed. However, that must include protecting greenbelt land and that any strategic allocations identified in greenbelt land must achieve the vision contained within the GMSF, they must be sustainable and able to cope with any new development, prior to that development taking place. Myself and indeed the people I represent in my ward are not NIMBY's and are not against development. They have serious concerns that can be factually proven to exist concerning air pollution, traffic congestion and lack of infrastructure and if these could be addressed with serious commitments in the GMSF then I believe the majority of people would agree with a sensible number for development in High Lane.

However, this is not the case, which brings me to question 113 of the draft GMSF which states – "Do you agree with the proposed policy GM Allocation 38: High Lane?" The firm answer to this is strongly disagree and the reasons for this are detailed below.

The reduction from the absurd proposal of 4,000 dwellings in the first draft down to 500 is welcome but it does not go far enough. The GMSF own vision states that you want Greater Manchester to be a place where people live healthy lives, to focus new homes within 800m of public transport hubs, to ensure that our communities and businesses are supported by infrastructure and that development should be in sustainable locations. This proposal fails massively on all of these counts.

In terms of this allocation being in a sustainable location, having read the Site Selection document, I understand the GMSF site selection methodology was used to



identify the most sustainable locations for development that can achieve the GMSF Vision, Objectives and Spatial Strategy. The objectives that helped to form the Site Selection Criteria are –

1. Meet our housing need
2. Create neighbourhoods of choice
3. Create a thriving and productive economy in all parts of Greater Manchester
4. Maximise the potential arising from our national and international assets.
5. Reduce inequalities and improve prosperity.
6. Promote the sustainable movement of people, goods and information
7. Ensure that Greater Manchester is more resilient and carbon neutral city-region.
8. Improve the quality of our natural environment and access to green spaces.
9. Ensure access to physical and social infrastructure.

There were seven site selection criteria developed for sites in the Green belt. These were –

1. Land which has been previously developed and/ or land which is well served by public transport
2. Land that is able to take advantage of the key assets and opportunities that genuinely distinguish Greater Manchester from its competitors.
3. Land that can maximise existing economic opportunities which have significant capacity to deliver transformational change and / or boost the competitiveness and connectivity of Greater Manchester and genuinely deliver inclusive growth.
4. Land within 800m of a main town centre boundary or 800m from the other town centres centroids.
5. Land which would have a direct significant impact on delivering urban regeneration.
6. Land where transport investment (by the developer) and the creation of significant new demand (through appropriate development densities) would support the delivery of long-term viable sustainable travel options and delivers significant wider community benefits.
7. Land that would deliver significant local benefits by addressing a major local / problem issue.

As far as I can see, the GM Site 38 in High Lane, meets only one of these criteria, which is Criteria 7 – Deliver significant local benefits by addressing a major local problem / issue. Criteria 7 relates to sites which have the potential to deliver significant local benefits by addressing a major local problem / issue. These issues were identified using local knowledge.

It relates to sites which can demonstrate direct link(s) to addressing a specific local need. To meet the criterion a site would be required to bring benefits across a wider area than the development itself and / or would bring benefits to existing communities. The type of benefits that potential sites could deliver are:

- Provide deliverable sites for housing in the north of Greater Manchester where there is an opportunity to capitalise on an existing high end market housing area and / or provide an opportunity to diversify the housing market, contributing to the competitiveness of the north.



- Provide a specific type of housing to meet a locally identified need e.g. older persons accommodation
- Development would allow for the re-use and enhancement of an at-risk heritage asset
- Development would allow for the provision / retention of unviable community facility e.g. sports pitches
- Development would deliver significant highway improvements which will help to resolve existing issues in the wider area.

I have been advised that the specific local need this addresses is to provide older persons accommodation, but this would not bring benefits across a wider area than the development itself and seems disproportionate to allocate over 500 dwellings in one area of the Borough for one specific need.

In addition, the proposed parcel of land would go directly against 4 of the 9 objectives of the GMSF which are shown below -

1. Promote the sustainable movement of people, goods and information
2. Ensure that Greater Manchester is more resilient and carbon neutral city-region.
3. Improve the quality of our natural environment and access to green spaces.
4. Ensure access to physical and social infrastructure

In the Green Belt topic paper, you put forward your case for the re-allocation of greenbelt land due to exceptional circumstances (Page 22 - <https://www.greatermanchester-ca.gov.uk/.../green-belt-topic-...> ). It states – “The selected strategic locations and allocations in the Green Belt are well served by public transport, take advantage of key assets, maximise economic opportunities which have significant capacity to deliver transformational change, deliver inclusive growth, support town centres and have a significant impact on their regeneration, deliver long-term sustainable travel options and enable significant wider community benefits;”

This is clearly not the case for Allocation 38 where it is -

1. Not well served by public transport
2. Does not take advantage of key assets
3. Will not deliver transformational change
4. Will not deliver inclusive growth
5. Does not support town centres
6. Will not deliver long-term sustainable travel options
7. Is unlikely to enable significant wider community benefits.

The site would also fail to be sustainable and be a location where people live healthy lives due to the levels of air pollution. Air pollution is a significant concern and the GMSF states it will be addressed. However, when levels were measured in High Lane in 2014, they were deemed to be above the legal limit. By adding 500 new dwellings in High Lane, this will make an already bad situation worse. The proposals set out in the Clean Air plan will not address the Air Pollution in High Lane. Indeed, the Chief Executive of the GMCA, Mr Eammon Boylan, signed a Memorandum of Understanding with Cheshire East Council in 2014 when he was Chief Executive of SMBC. This stated that SMBC agreed a development of 500 houses that was taken by Cheshire East for High Peak Borough would “significantly reduce what would otherwise be extra traffic congestion on the A6 and avoid a material deterioration of air quality at High Lane in Stockport.” Therefore, if the 500 dwellings were built in High Peak, by SMBC’s own admission, it would have had a detrimental impact on traffic



congestion and air quality in High Lane. Based on this, how can you justify building the 500 dwellings actually in High Lane, where you would also be adding two additional junctions onto the A6?

This brings me neatly onto the issue of traffic congestion. With the opening of the A6 MARR road, the traffic through High Lane at the area proposed in the GMSF has increased by a predicted 24% (6,200 more vehicles per day). Average rush hour speeds on the A6 between High Lane and the M60 are 13mph. Adding another 500 dwellings will add at least 500 more vehicles to this, which would be about 1,000 more movements per day. There is little mention in the GMSF of any additional transport infrastructure that would reduce the congestion within High Lane. The only item mentioned is the "possibility" for a new railway station in High Lane which is just not acceptable.

Finally, the overall GMSF numbers are still too high. The ONS revised their population growth numbers down in 2016, which would result in a Housing Need of 154,000 homes over a 20-year period, undermining the GMSF's goal of 201,000. Using the 2014 numbers goes against current planning policy which states to use the latest ONS figures. However, I understand that the Government have advised the GMCA to use the 2014 ONS Projections. The response to the Govt consultation states - "We are specifying in planning guidance that using the 2016-based household projections will not be considered to be an exceptional circumstance that justifies identifying minimum need levels lower than those identified by the standard method."

So, I agree with Andy Burnham that Greater Manchester does not have the discretion over housing numbers which was suggested by the Govt Minister. However, while it does not have the discretion over which baseline projections to use, it does have discretion over the housing numbers.

The National Planning Policy Framework (NPPF) states in Article 22 -

"Strategic policies should look ahead over a minimum 15 year period from adoption, to anticipate and respond to long-term requirements and opportunities, such as those arising from major improvements in infrastructure."

and in Article 67 -

"Planning policies should identify a supply of:

- a) specific, deliverable sites for years one to five of the plan period; and
- b) specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the plan."

So Planning Guidance states a 15 year period, yet GM have opted for a 19 year period. Why does this matter? Under a 19 year plan, the Housing Need is calculated as 201,000 but crucially a land supply figure of 189,000, meaning GM does not have enough land to meet the demand, which ultimately needs green belt land to be released.

Under a 15 year plan, the Housing Need is calculated as 159,000 with a land supply figure of 176,000 meaning they have more land than they would need. Indeed, given

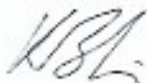
the annual housing need in GM is 10,583, they have enough land to cover just short of a 17 year plan. This means no release from the green belt in this plan period.

Given all of the uncertainty surrounding which number projections to use and the potential impact of Brexit, it would make sense to limit the plan period to 15 years. Per the Planning Guidance, the policies should identify a supply of specific, developable sites or broad locations for growth, WHERE POSSIBLE for years 11-15 of the plan.

Allocating land from the Greenbelt based on the above is a political choice rather than a necessity.

In summary, the GMSF as a concept is a good idea, but the final version must take account of the views and concerns of the constituents, must be based on more realistic development needs and sites chosen that are sustainable. The issues identified in any sites chosen that are not sustainable must be addressed prior to any release of greenbelt land being considered. Indeed, no greenbelt land is required to be released at this stage given the land supply figures you have published for a reasonable plan period of 15 years.

Yours Sincerely,



Cllr Kenny Blair  
Independent Councillor  
Marple South and High Lane Ward  
Stockport Council