

# **GREATER MANCHESTER SPATIAL FRAMEWORK DRAFT PROPOSALS**

## **Submission on behalf of Woodford Community Council**

### **1. INTRODUCTION**

Woodford Community Council (WCC) believes that the Draft Proposals, currently out for consultation, are seriously flawed and therefore unacceptable in their present form.

WCC facilitated the establishment of Woodford Neighbourhood Forum in 2013, under the provisions of the 2011 Localism Act, to provide residents with a say in the future of their area. Since then the Forum has spent thousands of hours developing a draft Neighbourhood Plan, with extensive supporting studies and documentation. WCC fully supports this Plan and is pleased to acknowledge the expertise of WNF members in formulating the following comments.

### **2. SUMMARY OF MAIN POINTS**

- The 'Vision' seeks to achieve significant economic growth over the next twenty years, but with no matching strategy apart from a 'one size fits all' approach of indiscriminately allocating land for commercial and residential development. A more effective vision and strategy would be to address the needs of the individual boroughs in a coordinated manner and to concentrate on urban regeneration. The aspiration to grow goes beyond meeting needs, with negative consequences that will affect the health, happiness and productivity of current and future generations. These consequences will be counter to its stated aims and the NPPF.
- The release of Green Belt land to meet housing needs is counter to the NPPG, all the more so because it goes above and beyond meeting needs. This does not constitute the required exceptional circumstances for Green Belt release.
- Councils' brownfield site registers are not up to date. They must be brought up to date and every effort should be made to utilise the sites before any Green Belt is released for development.
- The GMSF fails in the duty to co-operate with neighbouring authorities.
- The jobs and housing projections rely on untenable economic growth assumptions, which are greatly in excess of baseline forecasts. Such a huge scale of over-supply poses significant risks in terms of the ability of GMSF to be implemented. The inflated and highly variable numbers from potential projection scenarios (+/- 40% around the mean) cannot be justified to demonstrate exceptional circumstances for the proposed scale of land to be released from the Green Belt.
- The proposals have not been democratically prepared: residents and their elected representatives have been largely unaware of the proposals until very recently, the current consultation is taking place at a time when working people with families are exceptionally busy, and there is a question mark over the democratic nature of future decisions regarding the proposals.

- Developers, who have a strong vested financial interest in growth, appear to have been too influential in the early stages of plan preparation and in previous rounds of consultation. Arguably, they should be barred from further input now due to a conflict of interests.
- The outcry of protest from many thousands of residents across the Greater Manchester region demonstrates that there is little popular support for the proposals.
- The proposals contradict the GMSF's own strategy (Para 2.5) of minimising environmental impacts and reducing the need to travel.
- The draft GMSF is not sustainable because it would destroy green areas that absorb carbon from the atmosphere, provide habitats for wildlife and are part of the beautiful British countryside heritage, which we should pass on to future generations. It would encourage car travel, increasing traffic congestion and air pollution.
- The plan is undeliverable because it will not be possible to mitigate in any reasonable timescale the increase in traffic due to the increase in population in locations where the road infrastructure is already congested and where there is no easy access to public transport.
- The draft GMSF is also unsustainable because the Woodford, Cheadle Hulme, Cheadle Heath and Bramhall areas currently have virtually full employment levels, so new residents would have to travel out of the area to work, adding to road congestion and pollution.
- With specific reference to Woodford OA20, Woodford Neighbourhood Forum has assembled a large library of information and evidence to support its emerging Neighbourhood Plan. This evidence supports the following points. The draft GMSF is:
  - Unjustified and unsound because the Green Belt here fulfils the five main purposes outlined in NPPF Para 80 and exceptional circumstances have not been met to justify release.
  - Unsound because it proposes removal of 34% of Green Belt land in Woodford Neighbourhood Area, leaving a narrow strip of Green Belt around this area, which does not fulfil the purposes of Green Belt.
  - Unsound because it goes way beyond meeting the predicted housing needs of the local area.
  - Unsustainable because it would disrupt farm businesses that contribute to the economy.
  - Unsustainable because it would disrupt and destroy wildlife habitats and corridors.
  - Unsustainable because there is no easy access to public transport, forcing more traffic onto very congested roads.
  - Undeliverable because much of the area is unsuitable for development due to geological features, flooding and tipping.
  - Undeliverable because it would not be feasible to provide the necessary improvements in road infrastructure to support such a huge increase in the population in this location.

Further details and supporting evidence are given in the following Section.

### **3. DETAILED COMMENTS**

#### **3.1 The overall vision is not justified**

The GMSF proposals represent aspirations for growth that go beyond meeting predicted needs. This is stated in the draft GMSF Para 1.19: [“The vision builds on the Greater Manchester Strategy and sets out how Greater Manchester is planning to meet levels of growth well above baseline forecasts.”](#)

The Objectively Assessed Housing Need, November 2015, concludes that 217,350 new dwellings will be needed over the period 2014-2035. It notes that this is high and questions whether it is realistic or desirable. And yet the GMSF proposes even higher levels of 227,000.

There is no evidence to show that increasing urban scale increases productivity and economic performance.

The draft GMSF is counter to the NPPG, which states that housing need is unlikely to constitute exceptional circumstances for Green Belt release. Expansion over and above predicted need must surely be even less justified.

### **3.2 The economic and population predictions are not accurate**

The Office of National Statistics and DCLG take great care to point out that predictions for population growth should be treated with caution and not be taken as fact. These not-necessarily-reliable numbers have been fed into POPgroup software, which also provides a warning that the predictions give a guide and are not to be taken as fact, compounding the level of inaccuracy. Thus, very unreliable predictions are now being used as facts. In the parliamentary debate on 14 December 2016, William Wragg MP noted that taking the three most recent forecasts from the ONS (from 2008, 2010 and 2012) there is a variance of almost 200,000 people between the highest and lowest estimated for the population of Greater Manchester by 2030. This means that the number predictions are two thirds within the margin of error of the ONS forecasts.

The plan is not sound and release of Green Belt is not justified with such a variance in the predictions.

### **3.3 Brownfield sites**

It is imperative that all the Greater Manchester councils have up to date brownfield site registers, which have been thoroughly reviewed for future development. It is known, for example, that SMBC's is not up to date. How can decisions be made to destroy swathes of countryside for ever by releasing Green Belt for development before every possible effort is made to accommodate the required development elsewhere?

These proposals must not go ahead until a detailed review of brownfield sites has been prepared by each Council. Green Belt must only be released for development on an individual basis, Council by Council, area by area, once all other avenues for development have been exhausted.

### **3.4 Duty to Co-operate has not been effectively implemented**

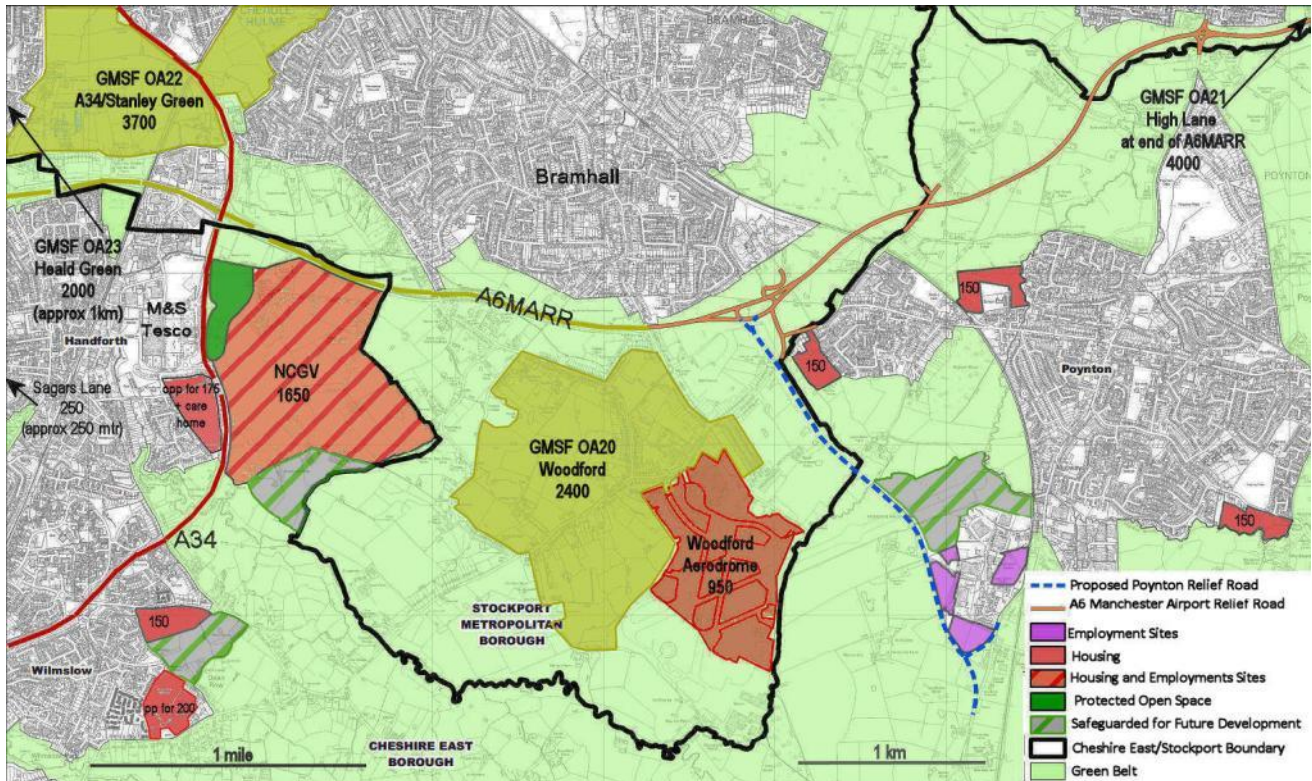
We do not believe that there has been effective implementation of the Duty to Co-operate between the Association of Greater Manchester Authorities (AGMA), Cheshire East Council (CEC) and other neighbouring authorities in the preparation of the GMSF proposals, with particular regard to joint monitoring of housing markets, the cumulative loss of Green Belt land and the delivery of the required road infrastructure to support new development proposals.

It is of paramount importance that Councils work closely and openly with each other throughout this process, particularly as these proposals have such a huge affect on the whole of the area.

### 3.5 Removal of land from Green Belt by both Greater Manchester and Cheshire East Councils

The cumulative impact of Green Belt loss in Cheshire East and Greater Manchester, which would be the result of the proposals in the CEC Local Plan and the GMSF proposals, will have a dramatic effect on the Green Belt in South Manchester. This is illustrated by the cumulative impact map below.

**Cumulative impact of GMSF proposals in addition to developments proposed in Cheshire East Local Plan, plus developments in Stockport.**



The CEC Local Plan, which is proceeding to final report, following a public examination, before the inspector gives his final verdict, proposes substantial Green Belt release, including 105 ha immediately adjacent to Woodford for the development of 1,650 new houses plus commercial premises in the North Cheshire Growth Village (site ref. CS30). The site currently performs the highest levels of the function of Green Belt, as outlined in the NPPF Paras 79-81 (ref. ARUP Green Belt Assessment on behalf of CEC).

The CEC Local Plan proposes removal of a further two sites from Green Belt in close proximity to Woodford, for the development of 150 dwellings on 4 ha of land south of Chester Road in Poynton (site ref CS59) and for 150 dwellings on land at Heathfield Farm Dean Row, Wilmslow (site ref CS62).

In addition, the CEC Local Plan proposes the safeguarding of Green Belt land for future development, including 14 ha adjacent to the NCGV in Handforth (site ref CS34), plus 9 ha at Heathfield Farm Wilmslow (CS63), plus 22 ha at Woodford Aerodrome (site ref. CS65).

All this is on top of planning permission granted by SMBC for 145 dwellings in Phase 1 and outline planning permission for a further 775 dwellings plus a care home and commercial premises at the Woodford Aerodrome site, which is previously developed land in Green Belt.

Now GMSF proposes releasing further Green Belt land in the same locality including:

- 238 ha at Woodford (ref. 0A20) to accommodate a further 2,400 homes
- land at Cheadle Hulme to accommodate 3,700 dwellings (ref. 0A22 land off A34);
- land at Heald Green to make room for 2,000 dwellings Green (ref. 0A23).

The cumulative impact of these developments would be the removal of Green Belt between settlements in Stockport and settlements in Cheshire East and the sprawling of the conurbation of Greater Manchester into Cheshire, as can be clearly seen on the map above. This would be contrary to the NPPF and GMSF's own policy aims (ref. GM13). It indicates a lack of co-operation and co-ordination between adjoining planning authorities.

The Inspector, Stephen Pratt, who conducted the examination of the CEC Local Plan, noted in his interim comments in 2014 that there were concerns about the principle of releasing Green Belt at Handforth East and about the cross-boundary implications and infrastructure requirements of this development.

### **3.6 Delivery of road infrastructure**

The A6 to Manchester Airport Relief Road (A6MARR) has not been designed to accommodate the impact of the proposals in the Cheshire East Local Plan or the GMSF proposals. Either of these plans alone would rapidly remove the intended "relief" to current traffic congestion. Together they present significant challenges, proposing a total of 16,000 extra dwellings plus additional commercial premises within 2 miles of the A6MARR. Similar problems would arise for the A34 bypass, which is already highly congested at peak times.

Representations made by SMBC to CEC point out the traffic problems that the CEC Local Plan (particularly with respect to the North Cheshire Growth Village) would create for road infrastructure. In a similar vein, representations made by CEC to AGMA point out the traffic problems that the GMSF proposals would create for road infrastructure. Unless these concerns are comprehensively addressed and plans put forward to alleviate the situation, the GMSF proposals should not go ahead. Hoping to create plans once approval has been given is illogical and a recipe for disaster.

### **3.7 The process has not been democratic**

There has been no evidence to show that the majority of residents of Great Manchester wish to see growth over and above baseline needs at the expense of Green Belt and with all the other negative impacts associated with higher population density. The process so far has been counter to NPPF Para 69 : ["local planning authorities should aim to involve all sections of the community in the development of Local Plans and in planning decisions."](#)

Furthermore, the out-pouring of protest in regions where proposed allocations would take large areas of land out of Green Belt, including Heald Green, High Lane and Woodford in Stockport and groups in



Wigan, Salford, Rochdale, Oldham and Tameside, provides strong evidence that large numbers of residents object strongly to these proposals.

We believe that developers, who have a strong vested financial interest in growth, have been too influential in the early stages of plan preparation and in previous rounds of consultation. For example, for the Options consultation in the autumn of 2015, three options were prepared. Option 1 prepared for the lowest growth, Option 2 prepared for a higher level. Option 3, which included a very high level of housing (over 300,000), was put forward by the Housing the Powerhouse group of developers. In the consultation, the question asked which option you **favour**. The results reveal a very low response rate. Out of a population of 2.7 million in Greater Manchester only 60 responses were received and only 51 of these expressed a preference. Of these, 33 (65%) were developers or their agents, all of whom chose growth options 2 or 3. Just 3 (6%) were residents who all chose option 1. This is misreported in the current GMSF documents as: “the vast majority of responses were **against** option 1”.

We can safely say that the vast majority of the population of Greater Manchester have not been involved in these proposals, which will have the most dramatic effect on the area in the last 50 years. Indeed, the elected councillors were not aware of the detail until the proposals were published in October. That cannot be democratic!

### **3.8 The proposals conflict with GMSF's own strategy**

Paragraph 2.5 of the Vision and Strategy states "There will be a very strong emphasis on directing new development towards locations that support urban regeneration, minimise environmental impacts, reduce the need to travel, and are/or can be made most accessible by public transport, cycling and walking. Development will be managed to ensure that it is both functional and architecturally inspiring and makes a positive contribution to the quality of places and the wellbeing of people securing the reuse of brownfield land, protecting open spaces within the urban area, and delivering genuinely sustainable neighbourhoods with supporting facilities and services."

The SMBC Green Belt allocation does not support the strategy. It does not support urban regeneration, it does not minimise environmental impacts and it does not reduce the need to travel, in fact it encourages it. Also it does not provide a positive contribution to the quality of places and the wellbeing of people, nor does it secure the re-use of brownfield land, protect open spaces or deliver a genuinely sustainable neighbourhood. In fact, all of the strategic allocations identify a portfolio of high quality housing sites that are outside the existing urban area, thereby going against the stated strategy.

### **3.9 The draft GMSF is not sustainable**

The draft GMSF Para 1.19 states that: “The GMSF supports long term prosperity as well as meeting short term needs and seeks to ensure that all places and all residents share in the benefits of growth at the same time as building a resilient Greater Manchester, improving our green infrastructure network, reducing carbon emissions, addressing air quality and reducing flood risk.”

Contrary to this laudable aim, the plan seeks to replace large area of Green Belt with urban development. Green Belt performs an important function as the green lungs (green plants maintain an environment suitable for human life by absorbing carbon dioxide and producing oxygen), it improves

human physical and mental health and contributes to the economy via agricultural and horticulture. The benefits of the English countryside should be passed on to future generations. By allocating sites in rural locations, with low job opportunities, which are inaccessible to public transport, the plan contributes to traffic congestion, air pollution (already above recommended levels in some areas), and greenhouse gas emissions. This is not sustainable development.

In aiming to meet the OAN for Stockport by the use of Green Belt, the GMSF would be undertaking unsustainable development and be in contravention of NPPF Para 84.

GMSF policy GM5 begins to suggest a more appropriate solution, exploring opportunities to increase density close to local centres and public transport stops, with density tailored to relative accessibility of the site by walking, cycling and public transport, enabling more people to live in the most accessible locations.

### **3.10 The draft GMSF is not deliverable**

The infrastructure required to support such a massive growth programme could not be provided in a reasonable timescale in order to avoid negative impacts. In the case of road infrastructure it seems unlikely that the required mitigation and relief could be provided at all in already built up areas without large scale demolition programmes and destruction of further tracts of countryside.

### **3.11 Points specific to Woodford OA20**

Woodford Neighbourhood Forum has assembled a large library of information and evidence to support its emerging Neighbourhood Plan. This evidence supports the following points. The allocation of Woodford OA20 in the draft GMSF is:

#### **Unjustified and unsound**

- The Green Belt here fulfils the five main purposes outlined in NPPG Para 80 and exceptional circumstances have not been met to justify its release. It prevents urban sprawl and coalescence of neighbouring towns, including Bramhall, Cheadle Hulme, Poynton, Wilmslow, and Handforth, protecting the character of these historic settlements.
- GMSF proposes removal of 34% of Green Belt land in Woodford Neighbourhood Area. It proposes leaving a narrow strip of Green Belt around this area, which is only 240 metres wide where Woodford adjoins the proposed North Cheshire Growth Village in the CEC Local Plan and only 160 metres wide at the North Eastern end where Woodford adjoins housing in Bramhall. Such a narrow band does not fulfil the purposes of Green Belt and the resulting island of development in Woodford would be an anomaly.

(Note: this calculation based on the area of 153.9 ha for Woodford OA20 quoted in Flood Risk and Water Management Evidence Paper, not 238 ha incorrectly quoted in the draft GMSF. Woodford Neighbourhood Area is 458 ha)

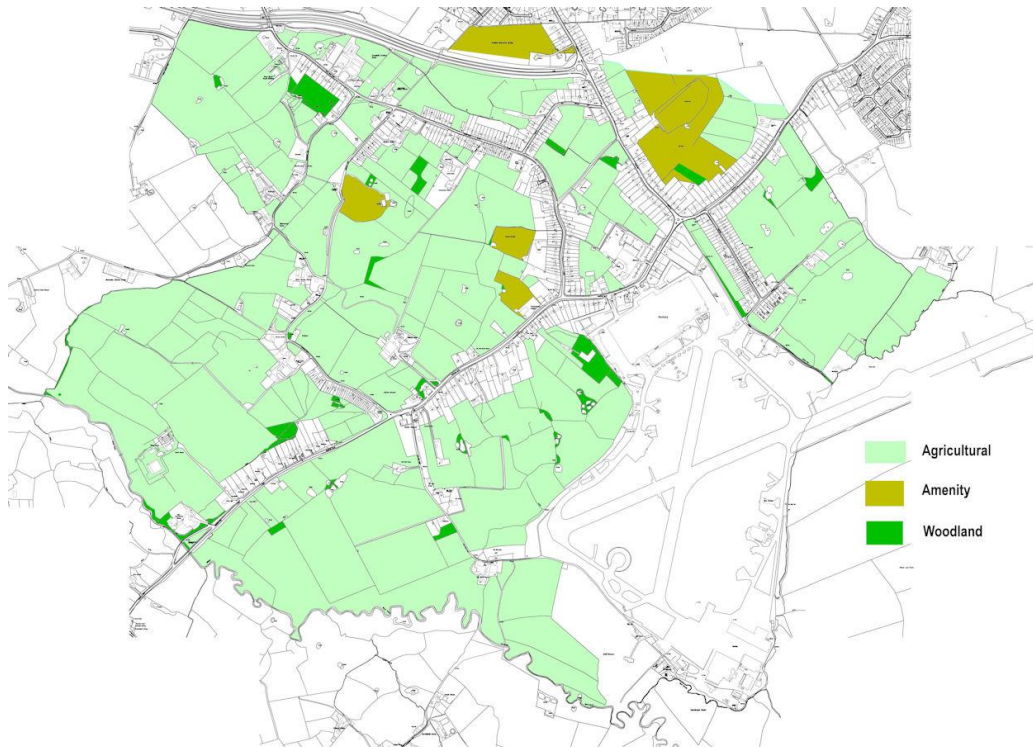
- Most importantly, the Green Belt is a very precious resource for the wider community. People from far and wide come here to walk, jog, cycle and ride horses. With uninterrupted views over the Pennines from the lanes and footpaths and seasonal floods attracting rare birds, it is a favourite spot for photographers and birdwatchers. There is a lot of evidence now for the physical and mental benefits of exercise in green places. It should be retained for the benefit of the wider community.

- It goes way beyond meeting the predicted housing needs of the local area. A housing needs assessment by AECOM, commissioned by the Neighbourhood Forum to provide information for the Neighbourhood Plan, concluded that the housing needs for Woodford up to 2026 were 20 to 25 dwellings, which could be provided by the development on the aerodrome site. The report can be found on the WNF website: <http://woodfordnf.co.uk/wp-content/uploads/2015/10/AECOM-Woodford-Housing-Policy-Advice-2015.pdf>
- In responses to a questionnaire in 2014, residents emphasised their wish to preserve the Green Belt, views, open spaces and rural feel of Woodford. We have a responsibility to argue the case on behalf of residents who chose to live here because of those features.
- A Heritage and Character Assessment of Woodford carried out by AECOM in August 2016 on behalf of Woodford Neighbourhood Forum concluded that unsympathetic development could result in reduction in openness, and loss of historic features or mature vegetation. In the appendix, it included maps showing special features to be protected, including views and countryside gaps. It can be viewed on the WNF website: <http://woodfordnf.co.uk/wp-content/uploads/2016/08/NP-Woodford-HCA-FINAL-LR-160815.pdf>

### Unsustainable

- It would disrupt farmland, which contributes to the economy. Woodford is 78% open green fields (very largely farmland with a small amount of amenity land) and 22% built environment (buildings and roads). Agriculture and horticulture are important parts of the life style here, contributing to the food supply and providing employment.

### Map of land use in Woodford



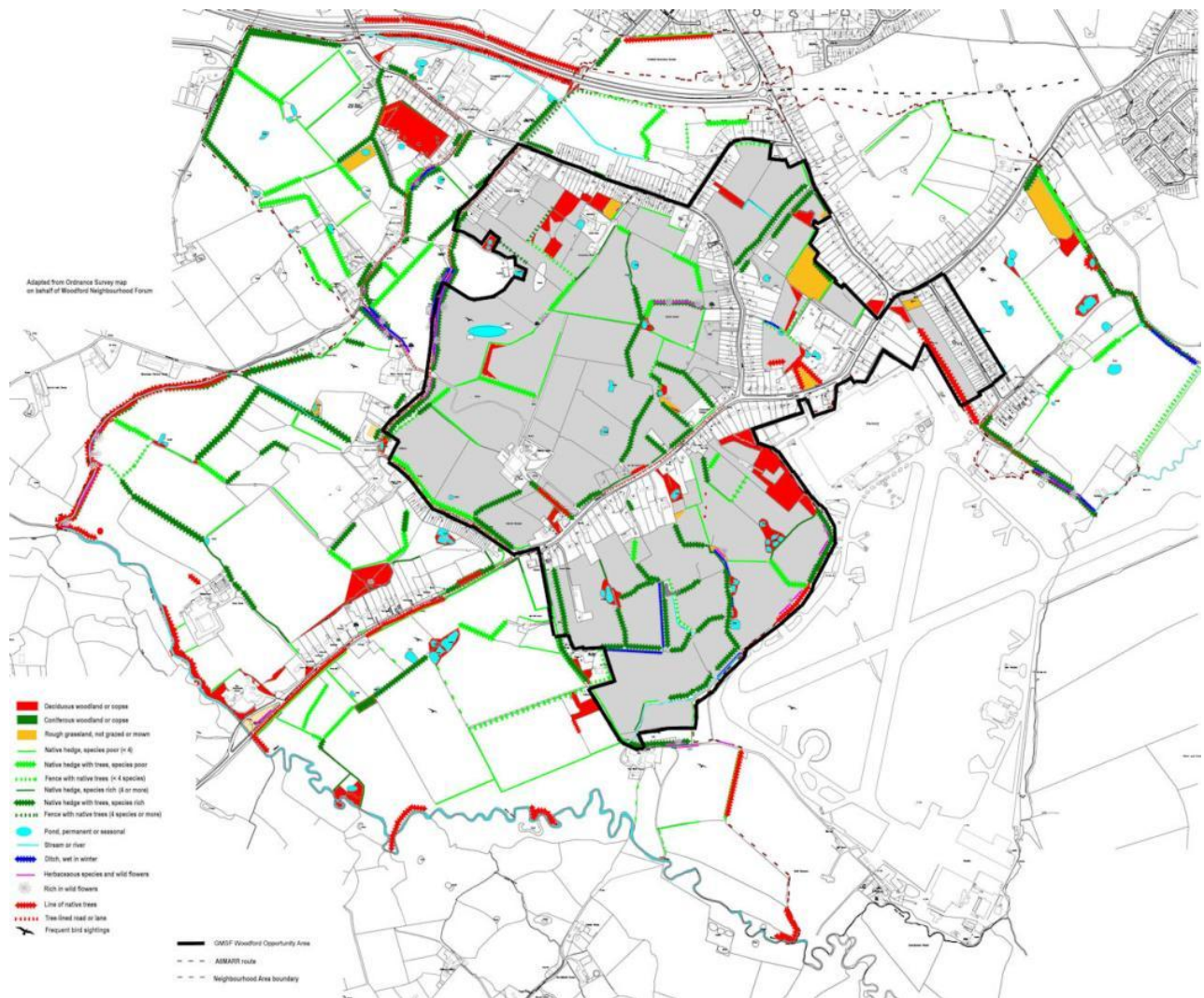
- It would disrupt and destroy wildlife habitats and corridors (see map below). Woodford Neighbourhood Forum has undertaken extensive and detailed surveys of the landscape,



environment and habitats for wildlife here. The area was once part of the royal hunting forest and was later cleared for agriculture. Evidence of this history can be seen in the large number of mature native trees, particularly oaks, and species rich hedgerows, many of which will be in the age range 200-400 years old. Woodford is flat, low lying and wet with a large number of ponds and ditches. All these natural features provide excellent habitats and corridors for wildlife. The volunteer studies will be supplemented by a report by Cheshire Wildlife Trust which is due to be completed early in 2017. The results can be viewed on the WNF website:

<http://woodfordnf.co.uk/neighbourhood-plan/landscape-and-environment/>

**Key natural features in Woodford with area that would be affected by GMSF shown in grey**



A higher resolution version of the natural features map is on the WNF website:

<http://woodfordnf.co.uk/wp-content/uploads/2016/11/Woodford-NA-natural-features-26-Oct-2016.pdf>

- Woodford area OA20 fails the requirements detailed in Paras 14.15, 14.24 and 14.29 in the Strategic Options Background Paper 3 – Objectively Assessed Housing Need. There is no easy access to public transport, forcing more traffic on to very congested roads. The nearest railway stations are in Bramhall and Poynton which are 1 -3 miles away from locations in Woodford. Many locations in Woodford are more than half a mile from a bus stop. The TfGM 2040 strategy does not propose any development or improvement anywhere close to Woodford.

## Undeliverable

- Much of the area is unsuitable for development due to geological features, flooding and tipping. Woodford lies on an aquifer consisting of ground water held in porous sandstones laid down 200 million years ago in the Triassic period, sand and marl (a crumbly mixture of clay and limestone). The area was covered with glacial sediments as the glaciers of the last Ice Age retreated, forming the Cheshire Plain. The soils of Woodford consist mostly of clay, with pockets of sand, including running sand. Drainage is poor and in many areas the ground becomes water-logged and prone to flooding in wet weather. This is supported by environmental studies conducted specifically on the former Woodford aerodrome site, which indicate that the site lies on an aquifer consisting of permeable, solid sandstone and pebble beds with high capacity for water storage. Above this, layers of sand and gravel hold some ground water, while extensive layers of clay are impermeable with very low capacity for water storage.
- Subsidence is a recognised feature of this type of ground because cohesive soils such as clay and silt vary in their ability to change their volume when wetted or dried. When wet they will expand (swell) and when dry they will shrink (ref <http://www.subsidence-support.co.uk/what-causes-subsidence.html>).
- In the past, water authorities have taken water from the aquifer under Woodford. Some water will be held in the rigid structure of porous sandstone. If there is also water here held in less rigid structures below ground, which seems quite likely, then excess water abstraction could cause subsidence. Ref <http://geochange.er.usgs.gov/sw/changes/anthropogenic/subside/> which states that: In many aquifers, ground water is pumped from pore spaces between grains of sand and gravel. If an aquifer has beds of clay or silt within or next to it the lowered water pressure in the sand and gravel causes slow drainage of water from the clay and silt beds. The reduced water pressure is a loss of support for the clay and silt beds. Because these beds are compressible, they compact (become thinner), and the effects are seen as a lowering of the land surface. The lowering of land surface elevation from this process is permanent. For example, if lowered ground-water levels caused land subsidence, recharging the aquifer until ground water returned to the original levels would not result in an appreciable recovery of the land-surface elevation.
- Subsidence and flooding have been observed during the lifetime of long-term residents in parts of Woodford OA20 to the south east and to the north west of Chester Road. Reports include:
  - New cracks in plaster in houses in Chester Road in OA20, one of which is over 300 years old
  - Undulation, cracking and finally a hole appearing in Chester Road in OA20.
  - Ground level changes in OA20 to the south of Chester Road, such that field drains which used to lead water away downhill in the 1970s now fail to drain as they point uphill.
  - Rafts being needed to support buildings in flood prone areas e.g. the Bird Estate near Woodford and a recent extension to a house in OA20 on Moor Lane.
  - Reports from workers on the Redrow estate of the need to drive piles down to over 80 feet in order to reach a solid substrate in one area.
  - Farmer and resident observations of changes in land level and flooding patterns in OA20 to south of Church Lane
- Much of the farmland in Woodford is flat and low lying. Water does not drain away through areas of impermeable clay soil, creating seasonal ponds which are a familiar feature to locals and a favourite destination for migratory birds. SUDS would be a significant challenge!

- The central part of Hill Top Farm was used for tipping in 2008 and 2009. The ground level was significantly raised with an assortment of materials and will take time to settle.
- Finally, it is not deliverable because it would not be feasible to provide the very significant improvements in road infrastructure that would be needed to support the huge increase in population proposed here.

#### **4. CONCLUSIONS**

The draft GMSF proposals are not fit for purpose and the methods used to predict growth are not reliable. Revisions are needed to produce a plan that meets genuine housing needs, rather than developer aspirations, and that leads to the regeneration of town centres and encourages high-skilled employment.

Residents have sent a clear message that they do not want over-ambitious growth aspirations, with all the resulting negative effects of high population density, spreading urbanisation, loss of precious countryside and Green Belt, traffic congestion, air pollution, and reduced health, happiness and productivity.

**Woodford Community Council**

**c/o 373, Chester Road, Woodford, Stockport, Cheshire, SK7 1QQ**

**Email: [info@woodfordcommunity.co.uk](mailto:info@woodfordcommunity.co.uk)**

**Website: [www.woodfordcommunity.co.uk](http://www.woodfordcommunity.co.uk)**