



Woodford Community Council

12 October 2012

The Planning Policy Team
Stockport Metropolitan Borough Council
Place Directorate
Stopford House
Stockport
SK1 3XE

Dear Sirs,

Formal Response to the Stockport MBC Consultation on the Woodford Aerodrome Opportunity Site Supplementary Planning Document (SPD) submitted on behalf of Woodford Community Council

Thank you for the opportunity to respond to your consultation regarding **Woodford Aerodrome Opportunity Site Supplementary Planning Document (SPD)**. As you know, Woodford Community Council has taken an active role in the consultation process and we would like to thank officers and elected members of the Council for enabling the community to consider the many issues raised.

Our primary position is that the SPD is inappropriate as a mechanism to deliver the correct policy framework for the determination of the future development of this important site. The Woodford Community Council therefore objects to the SPD. The preparation of the SPD should cease and the information and evidence gathering be deployed as part of the Site Allocations DPD or an Action Area Plan. The suggestion made by the Community Council ensures the widest consultation, the ability to take into account the availability and prioritisation of other sites in the Borough as a whole and, most importantly, be subjected to independent examination by a Planning Inspector testing the proposals for “soundness”.

The remaining comments on the SPD are therefore without prejudice to our primary position.

Taking into account the views from residents, from Cheshire East Council’s Strategic Planning Board and from other sources (including some specialist advice), Woodford Community Council has concluded that in its present form the SPD is not fit for purpose since it is an inappropriate planning process to deliver the necessary re-use and redevelopment of the site. More than that, it is contrary to national, borough-wide and local planning principles for the Woodford area and the site itself. In addition, as drafted, it does not comply with policies in the Development Plan, as we shall demonstrate. The SPD seeks to create new policy and also fails to comply with existing policy in a number of important areas.

Furthermore, the SPD does not fulfil some of its main functions, as discussed at the Core Strategy public examination, in terms of providing further guidance for potential developers regarding such matters as improving sustainability and accessibility and housing mix, tenure and affordability.

For these reasons, Woodford Community Council is writing to the Secretary of State for Communities and Local Government, requesting him to require the Council to defer any further consideration of the SPD (including its adoption) until it is compliant with proper planning procedures as set out in legislation and guidance. Notwithstanding this position, which we shall be pursuing with our Member of Parliament and Cheshire East Council, we are attaching below the collated findings from Woodford Community Council's own consultation and observations. You may already have received much of the content directly from members and residents, but it is included for clarity of reference.

We recognise and value the Planning Inspector's report on the Core Strategy accepting the production of an SPD could provide guidance on the development of the site. However, we do not consider the SPD document should be the sole process to address development on this scale, but recognise that identifying such a factor would have been outside his brief. Nor does the current version of the SPD remotely reflect the proposals at the time of the Inspector's conclusion or his actual recommendation.

It is the developer's admission that the site is one of the largest potential developments in the North West and the weight placed on the SPD, when considering any planning application, could be disproportionate or out of context with the objectives of such a document. It is not open to independent scrutiny nor a policy document, neither is it adherent to the principles, nor compliant with objectives contained within the Stockport Core Strategy, emerging Allocations Plan, nor National Greenbelt policy. Indeed it is inconsistent and conflicts with many of these policies,

It is our view that the SDP is flawed and not fit for purpose.

We request and recommend that higher level planning documentation either by an Allocations Plan or an Action Area Plan (possibly jointly with Cheshire East Council) be produced to address the issues of this site including the wider context of possible development on the Cheshire East area of the site. Either of these would be subject to independent scrutiny. It is of concern that SMBC offered no justification for the omission of this option.

We support our case for the above with the following observations.

1 Developable Area and Greenbelt

1.1 It has been estimated that the proposed development area for this SPD is approximately 30% more than the combined areas of the existing MEDS. This is a major incursion into the Green Belt contrary to both national Green Belt policy, as confirmed in the National Planning Policy Statement of 2012, and Green Belt policies within both Stockport and Cheshire East.

1.2 Whilst recognised as a possible option, the joining of the two MEDS areas conflicts with the retained UDP policies, not least by encompassing land to the Northern section of the site which is not previously developed.

1.3 The positioning of this amount of development in a location, which the Council itself accepts as poorly served by transport infrastructure, is contrary to the principles of sustainable development set out in the NPPF. It is also contrary to the prioritisation of the most sustainable locations near to the centre of Stockport in the Core Strategy.

1.4 The attempt to redefine new Green Belt boundaries through an SPD is contrary to the NPPF.

2 Failure of the SPD to comply with the Core Strategy

2.1 In respect of housing, the preferred location for new housing in the Core Strategy is within and adjoining town and district centres of the Borough and “in other locations which are genuinely sustainably accessible within the urban areas” (paragraph 3.3 of the Core Strategy). The SPD advances a site for residential development that is acknowledged to be seriously deficient in infrastructure that would render it capable of being a sustainable location for development by the standards of the Core Strategy.

2.2 There is no adopted Allocations Plan and, as the SPD aims to circumvent this, it is premature in its proposals.

2.3 In respect of land use, the Core Strategy provides for a mixed employment and housing scheme based upon the recommendations of the Planning Inspector at the public inquiry into the Core Strategy. The SPD is not compliant with these principles. The SPD fails to address that which the Inspector anticipated; namely, the employment needs and potential of the site to deliver a mix of land uses.

2.4 The SPD simply does not grapple with the issues necessary for it to be a document that addresses the future use of the site. It “shuffles off” to a future planning application major issues that need to be addressed. These include extent and location of affordable housing, the highway infrastructure needed to serve the development, what would happen if future highway schemes were not progressed and whether the development should be subject to linkage with other aspects to ensure a mixed use site. The SPD gives the impression that it has the sole purpose of allocating the whole site for residential development and then awaiting a planning application to sort out the detail. Such an approach is unacceptable.

3 Loss of employment land

The SPD makes no provision whatsoever for any employment uses on the site, other than reference to a possible primary school and local shops. A range of possible uses on some of the site were indicated as being acceptable to the Planning Inspector, including some new build and/or some changes of use. The Council’s own adopted policy acknowledges the need to protect employment areas from other uses (such as housing). It states (paragraph 3.3.5) “Were that to happen it would risk employment opportunities being missed in the longer term which could result in the need for greenfield and green belt being released to provide additional employment opportunities”. At the very least land must be reserved for this purpose.

4 Highways

The traffic study relies on a fall-back position that is inappropriate. To be given any weight a fall-back position must establish two propositions. Firstly, there must be the right to act

without further consideration by the LPA. Secondly, the LPA has to make a judgment about the likelihood of that right being exercised. As to the first matter it is accepted that there would be no legal impediment to a B2 use resuming on the site. However, in relation to the second issue the SPD itself makes reference to there being no chance of large, full-scale employment on site. As there is no likelihood of a B2 use resuming there is no “fall-back” position. It follows that the traffic analysis should ignore the historic use of the site and the traffic generation associated with a large scale industrial use.

Furthermore, the SPD relates to a 2001 baseline, which is inconsistent with current and predicted traffic flow, volume and direction. Therefore, any change of use from B2 to residential dictates that traffic modelling should be from a 2012 base. This is applicable even if employment is included on the site.

5 Sustainability and accessibility

5.1 The Core Strategy states “The site and the surrounding area of Woodford is currently poorly served by public transport and there are issues relating to the immediate highway access and links to wider highway network”. It proposes improvement to public transport and highways. The SPD itself proposes no improvements to the local highway network and no detailed proposals for improvements to public transport provision.

5.2 The SPD assumes that the SEMMMS road will be completed during the period of the development. The SPD makes no reference to what could happen if the SEMMMS road is not completed and the consequences for the site.

6 Trigger Points

These must be identified and quantified, based on residential build numbers for:

Primary School Provision
Nursery/Daycare Provision
Medical Provision
Care Village Provision
Local retail Provision
Public Transport Provision
Recreational and community facility provision

7 Omissions

Although not limited to the following, the SPD omits or fails to address adequately:

- Reference to existing housing stock, type, quantity and values.
- Housing need in Woodford and the south of Manchester.
- The costs/benefits to Woodford, the Borough and south Manchester of delivering a certain quantity of housing development.
- The impact and definition of affordable housing provision on the site in terms of viability and character of Woodford, together with alternative options.

- The employment base and need in the area, paying due cognisance to population increase following any regeneration or development.
- The transport strategy for the redevelopment of the site.
- Employment opportunities arising from the opportunities for the redevelopment to reduce energy consumption and increase energy production.
- Current school provision and capacity within Stockport & Cheshire East, including projected demand for both primary and secondary school places with and without regeneration. This should take into consideration priority areas and sibling policies for all educational establishments which may be affected.
- Statutory services/utilities plans plus assessment of capacity and additional requirements from the development.
- Support and enhancement of Community Facilities.
- Strategic assessment of flood risk and surface water drainage.
- The local impact during any construction or development activities.

Finally, save where those of Woodford Community Council are more robust, and without diluting, prejudicing or overriding our own recommendations, we additionally support the conclusions of Cheshire East Council as determined by their Strategic Planning board and outlined below.

1. Request the deferral of the SPD from progressing to adoption until the document is more compliant with national planning policy and Stockport's own Core Strategy and policy objectives.
2. Request that the total development area be limited to the full extent of the approved brownfield areas (the Major Existing Developed Areas) and that the other parts of the site, currently proposed for development and lying within the adopted Green Belt, be removed.
3. Request that some part of the site be identified and allocated for a range of employment uses, either as conversion of existing buildings or redevelopment.
4. Request that a full scheme of public transport improvements be investigated, costed and included in the SPD, dependent upon the scale and use of built development and given the site's rural nature.
5. Request that further work is undertaken on all wider community impacts (secondary education, medical, health, and other social facilities) and appropriate mitigation measures introduced into the SPD.

6. Request that further traffic modelling and impact studies are undertaken before the SPD is progressed, and that proposals are brought forward to address the impacts on the local road network include traffic management.

Paul Rodman
Chairman, Woodford Community Council