

Response to Consultation

Revised Draft Greater Manchester Spatial Framework, January 2019

Appendix 1

Questions concerning High Lane and the GMSF Site Selection Process

High Lane and the GMSF Site Selection Process

Introduction

For the reasons set out in the main body of our response to GMSF, High Lane is neither a suitable nor a sustainable location for development of the scale proposed in GM Allocation 38. The 2019 draft GMSF does not offer any substantive solutions to what are the actual major local problems/issues and constraints currently affecting High Lane, let alone the added impact of any proposed new development which, at the scale indicated, would increase the size of the existing village and its population, disproportionately, by some 26%.

Various documents have been made available as part of the consultation process which comprise the supporting evidence base for the decisions and proposals included in the 2019 draft GMSF, including the selection of sites for Green Belt release in the form of Allocations. In particular, GMSF Site Selection Topic Paper dated January 2019, includes the methodology adopted,

“to identify the most sustainable locations for residential and employment development that can achieve the GMSF Vision, Objectives and Spatial Strategy and meet the housing and employment land supply shortfall across GM”¹ (our emphasis).

Out of the seven GMSF Site Selection Criteria set out in Section 7 of the Topic Paper, in its Appendix 6, p.892, GM consider that High Lane meets just one, namely Criterion 7. Criterion 7 relates to sites that can

“deliver significant local benefits by addressing a major local problem/issue”

The Topic Paper is not explicit in terms of what the “*major local problem/issue*” is considered to be in relation to High Lane. However, based on the list of possible considerations set out in Table 1 on page 18 of the Topic Paper, it appears the only conceivable problem/issue that could be said to relate to this area is a need for older persons accommodation, given the current demographic of the High Lane area². However, such a need cannot reasonably be said to be a “major problem/issue” that requires development of the scale proposed nor an exceptional circumstance justifying a change to Stockport’s Green Belt boundary. Moreover, it cannot be reconciled with the obvious constraints that affect High Lane.

To anyone who knows, lives in, works in, passes through or visits High Lane, the “*major problem/issue*” that needs to be addressed relates to that of traffic congestion, illegal levels of air pollution and inadequate public transport options. These are pre-existing major problems/issues. An Allocation for 500 more dwellings on Green Belt land in the immediate local area will only make those issues worse.

In relation to the judgements made in GMSF’s Site Selection process, the Topic Paper emphasises that ***local knowledge*** has been used³. Whilst this could justify the recognition of some (limited) need for older persons accommodation it cannot justify the lack of recognition of the constraints.

¹ GMSF Site Selection Topic Paper Para 6.1

² However, item 2 of the description of Allocation 38 on page 360 of GMSF says there will in fact be a range of housing on the site besides older persons accommodation

³ For example paras 7.36 and 7.40

On behalf of the residents of High Lane, ***we request an explanation from GMCA and local planners as to how this judgement can be supported.***

Planning constraints are considered in Appendix 3 of the Topic Paper, but the Paper includes an admission that “*the constraints analysis was automatically generated using GIS information from a range of data sources to give an indication of a site’s development potential and identify planning constraint(s) that would preclude the development of a site”⁴. An example of why this creates a misleading picture is in connection with the stated constraint of carbon emissions, where the test used is in relation to what extent the site is within an Air Quality Management Area. The Greater Manchester Air Quality Action Plan explains the recent reduction in size of GM’s AQMA and, importantly, defines the new Key Priority Areas where the UK’s air quality objectives are exceeded. Given that High Lane features in all of Figures 2, 3, 9, 11 and 12 in Section 3 of the GMAQAP, it is undeniable that a major problem in relation to illegal air pollution in High Lane is acknowledged, but is avoided when compiling the planning constraints analysis for this site. This cannot be right and, again, local knowledge should have been brought to bear to preclude this site being selected in the first place.*

The conclusion of the Site Selection process is described in paragraph 7.42 of the Topic Paper, justifying the decision to include the Allocations (including High Lane) in GMSF:

“These Areas of Search are those which are considered to have no other significant constraints precluding development. Because the Areas of Search are derived from the Site Selection Criteria, it is considered that allocations within them will represent the best fit with delivering the GMSF Spatial Strategy” (our emphasis).

We respectfully point out that there are significant constraints precluding development in and around High Lane which appear to have been either overlooked or not fully appreciated. These are pre-existing constraints as explained in our main response. However, a further constraint in itself is the fact there is no credible or sustainable way to overcome those constraints and GMSF does not currently offer any substantive proposal of how they will be resolved in this area. For example:

- None of the road infrastructure strategies included in the accompanying Greater Manchester Transport Strategy will benefit High Lane or alleviate the volumes of through-traffic already gridlocking the village. The strategy does not even acknowledge the A6 as one of GM’s primary routes.
- Without major infrastructure investment, the (very welcome) concept of ‘Streets for All’ could not conceivably be achieved in High Lane given the traffic constraints, even though the shops, cafes and small businesses on Buxton Road - and the community - would otherwise benefit from that concept
- The current proposals for alleviating air pollution in the GMAQAP do not offer any answer to the problems affecting High Lane within the plan life of GMSF. The proposal for a GM-wide Clean Air Zone is welcome but unless and until pollution levels in High Lane are reduced to safe and legal levels consistently, it would be irresponsible to exacerbate the current problem by adding to the traffic congestion by allowing new development of the scale proposed.

⁴ Para 7.40

- Save for a ‘potential’ new station in High Lane on the existing already overcrowded Buxton to Manchester railway line (and without certainty as to timing, business case or even location) the Greater Manchester Transport Strategy 2040 offers nothing substantive in terms of public transport that will benefit High Lane, with all strategic improvements terminating several miles from the location of the proposed site.
- It is untenable to ignore the commercial reality and expect developers to fund the extent of infrastructure needed to support a development of 500 new homes in this location and, in any event, this would not address the pre-existing problems.
- GMSF does not currently propose any enforceable mechanism by which all necessary infrastructure would be guaranteed as a pre-requisite before any development commences and this is a significant concern.

In this context, we reiterate the summary of our main response to GMSF that any new development in High Lane needs to be proportionate, sustainable and supported by the necessary infrastructure and be *in the right locations*. The selection of the sites for such locations must take account of the significant constraints that affect the village as referred to above. Currently, the GMSF Site Selection process has not achieved this in relation to High Lane and the Residents Association would welcome further dialogue and consultation with GM to address this matter.