High Lane Residents Association

***Response to Consultation***
**Revised Draft Greater Manchester Spatial Framework, January 2019**

# Appendix 2

## *Analysis of Proposals for 500 New Homes on Green Belt Land in High Lane Village*
***outlined in the GMSF (published in January 2019)***

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## Contents

## Introduction

I am a resident of High Lane and I wish to register my strong objection to the proposals in the GMSF[1] to build "around 500 homes" on Green Belt land in High Lane.

## Background

High Lane is a picturesque village that lies on the outskirts of the Peak District, and with Macclesfield Canal and the Middlewood Way trail running through the village, and Lyme Park within walking distance, it is popular with walkers and families alike.[2] At the time of the last Census (2011), the village of High Lane comprised 1904 households, with a population of 4196 residents.[3]

## Traffic Congestion

Yet despite its small size and rurality, with the A6 road running through it, over recent decades it has been beset by growing problems of traffic congestion and air pollution. In January 1988, in the context of the stretch of the A6 between Hazel Grove and Whaley Bridge, the Department of Transport stated:[4]

> *by the mid-1990s, traffic on the A6 will **exceed** the practical capacity of the road, creating a severe environmental impact on local communities and causing delay and frustration to motorists.*

Decades later, having taken no action (in terms of building a bypass, as was proposed at the time), yet with all the added growth in traffic of the intervening years, modelling published in 2013 for the Planning Application for the nearby A6MARR (A6 to Manchester Airport Relief Road), concluded that even taking into account proposed enhanced mitigation measures, the AADT (Annual Average Daily Traffic) in 2017 with the A6MARR would be higher at all the modelled points in High Lane by between 11 to 20% than without it.[5]

In fact, maps[6] of the predicted morning and evening peak congestion post-A6MARR clearly show that High Lane and Handforth were the **only areas** with increased[7] traffic and delays in both periods — everywhere else either improves or stays the same. (Disley and an area near Manchester Airport were predicted to be worse in the morning peak only.)

**Conclusion**: the A6 through High Lane already suffers from heavy congestion, and the recently opened A6MARR — the A555 road extension with realigned A6 access — has increased traffic

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1 GREATER MANCHESTER COMBINED AUTHORITY, *Greater Manchester's Plan for Homes, Jobs and the Environment: Greater Manchester Spatial Framework*, Revised Draft, January 2019, Policy GM Allocation 38, pp.316-318 (pp. 318-320 of PDF), https://www.greatermanchester-ca.gov.uk/media/1710/gm_plan_for_homes_jobs_and_the_environment_1101-web.pdf

2 HIGH LANE WAR MEMORIAL VILLAGE HALL website, *Welcome to High Lane Village Hall*, retrieved 17th February 2019, http://www.highlanevillagehall.co.uk/

3 OFFICE FOR NATIONAL STATISTICS, *2011 UK Census*, https://www.nomisweb.co.uk/census/2011 using datasets QS406EW (Household Size) and KS101EW (Usual Resident Population) for the three High Lane LLSOAs: Stockport 038B, Stockport 038C and Stockport 038D.

4 DEPARTMENT OF TRANSPORT, *A6 Study: Disley and High Lane Bypass Public Consultation*, n.d. (but mentions exhibitions in January 1988 in the future tense, so probably dated January 1988 or December 1987).

5 ATKINS LIMITED, *A6 to Manchester Airport Relief Road: Transport Assessment*, 1007/6.15.2/183, October 2013, Fig. 9.6, p.173, http://a6marr.stockport.gov.uk/746597/760095/760276

6 *Ibid*., Figs. 9.4, 9.5, pp.168-169.

7 For these maps, the thresholds were a change in traffic of at least 5% and a change in overall junction delay of at least 15 seconds.

congestion even more in High Lane, although other areas of the borough will benefit from a reduction.

## Air Pollution

Figure 8.9[8] of the A6MARR's Environmental Statement[9] (published in 2013) shows the predicted **exceedances** of $NO_2$ limits along the A6 in High Lane. Figure 8.10 of this same document shows the predicted changes directly attributable to the A6MARR by comparing the scenarios of "without" to "with" the new road. Of the 24 locations shown in High Lane, 22 were **increases** — many in the highest category.

By contrast, on the Hazel Grove side along the A6, the overwhelming majority of points on the map show decreases of at least 4 µg/m$^3$. So, yet again, other areas benefit at the expense of High Lane.

Much of the traffic travelling on the A6 through High Lane can be categorised as HGVs, many of these vehicles being associated with quarrying-related activities from the Peak Quarries around Buxton. For example, at the most recent enumerated traffic count (in 2012),[10] there were over 1300 HGVs on average per day travelling on the A6 through the centre of High Lane; the most recent estimate (in 2017) puts the figure at over 1500, but with the A6MARR now open, it is likely to have increased again as a result of attracting traffic from further afield. Measurements that confirm this are expected later this year.

It has been said by some that changes in vehicle technology (e.g. electric cars) will help reduce air pollution. Whilst this may be true, I think it is very unlikely that any such changes will happen within the timescale of the GMSF to a significant enough extent to be of any real importance. The government has rejected calls[11] to bring forward its plans to end the sale of new diesel and petrol cars and vans from 2040 to 2032 — the target date remains[12] at 2040, i.e. beyond the GMSF period. Even if/when such a changeover occurs, it will take time to have an impact, as only new vehicle sales would be affected (although, of course, people could voluntarily choose to purchase electric vehicles before then). But such a changeover would be predicated on the many practical difficulties associated with electric vehicles being solved satisfactorily, not least of which includes their relative short range (particularly in winter) and the need for some owners to run electric power cables across the pavement (or down the stairs of their flat) from their home to their vehicle(s) outside to charge it (them), and the consequent trip hazards to the general public. It is easy to become over-optimistic about the pace of change, but the difficulties of overcoming the problems associated with everyday practicalities should not be underestimated.

But let's suppose, in the very best-case scenario, that all the new residents' vehicles were electric. They would still significantly increase the existing level of traffic congestion in High Lane, thereby

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[8] MOUCHEL, *Figures for Appendix 8 of the Environmental Statement for the A6MARR Planning Application*, 2013, Figure 8.9, p.9, http://a6marr.stockport.gov.uk/746597/760092/813246/813254

[9] MOUCHEL, *A6 to Manchester Airport Relief Road Environmental Statement*, Vol. 1, 1007/6.15.2/189, October 2013, http://a6marr.stockport.gov.uk/746597/760092/760274

[10] DEPARTMENT FOR TRANSPORT, *AADF Data at Count Point 56154*, http://api.dft.gov.uk/v3/trafficcounts/countpoint/id/56154.csv

[11] BBC, *How will the petrol and diesel ban work?*, 19th October 2018, https://www.bbc.co.uk/news/uk-40726868

[12] DEFRA, DHSC, *et al.*, *Government launches world-leading plan to tackle air pollution*, 14th January 2019, https://www.gov.uk/government/news/government-launches-world-leading-plan-to-tackle-air-pollution

adding to air pollution (through slower speeds and more stop/starting in queues), given that there will still be other diesel and petrol vehicles on the roads, and that HGVs (which, as mentioned above, are in a high proportion on the A6 through High Lane) are still expected to be diesel-powered for the foreseeable future.

In 2014, a six-month programme of monitoring[13] established a baseline for $NO_2$ concentrations in the air near the A6 in High Lane, prior to the opening of the A6MARR in 2018. Even in 2014, one of the locations (near High Lane Library) **exceeded** the legal limit for the annual mean concentration of $NO_2$ (of 40 µg/m$^3$ [14]) with a measurement of **43.1 µg/m$^3$**.

Given that the pollution levels were predicted to increase even more[8] after the new road opened, it would surely be irresponsible to add yet further traffic congestion and pollution to the A6 in this area by building 500 new homes, equating to an additional population of 1100 and 750 more cars or vans — High Lane residents having more than the national average number of cars or vans,[15] presumably because of the lack of alternative transport infrastructure and the need to travel because of the lack of local amenities in this semi-rural area.

And with more traffic on the A6, pollution in High Lane will increase even more, not only because of emissions from a greater number of vehicles, but also because more vehicles will mean fewer gaps available in the flow of A6 traffic for vehicles wishing to join the A6 from residential side roads, leading to more cars idling inefficiently for longer durations from cold starts while they wait. In addition, more traffic will mean slower speeds overall, which again, means increased pollution.[16] Adding two more access points for the 500 new GMSF homes will inevitably lead to more stopping and starting, further adding to pollution through reduced engine efficiency, as well as poorer fuel economy and increased delay and frustration for motorists.

Even without the 500 new homes in High Lane, the A6 is currently undergoing additional pressure from the growing pipeline of nearby developments along the A6 outside Greater Manchester. These include[17]: **97** dwellings in New Mills (decision imminent on planning application), **37** dwellings in New Mills, **107** dwellings in Whaley Bridge, **105** dwellings (Long Lane) in Chapel-

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[13] ATKINS, *A6MARR Monitoring and Evaluation Baseline Report: Appendix J. Pre-Construction Air Quality Monitoring Report*, Version 2.6, April 2016, pp. 1-29 of PDF, http://www.semmms.info/wp-content/uploads/A6MARR_BaselineReport_Final_appendixes_JtoLonly.pdf

[14] *Air Quality Standards Regulations 2010*, http://www.legislation.gov.uk/uksi/2010/1001/pdfs/uksi_20101001_en.pdf

[15] OFFICE FOR NATIONAL STATISTICS, *op. cit*., dataset QS416UK (Cars or Vans in Households) an average of 1.5 cars or vans per household in High Lane, compared to an average of 1.2 in England; and dataset QS406EW (Household Size), an average of 2.2 people per household in High Lane.

[16] RICARDO-AEA (Report to the DfT), *Production of Updated Emission Curves for Use in the National Transport Model*, Issue Version 2, 24th February 2014, https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/662795/updated-emission-curves-ntm.pdf

[17] http://planning.highpeak.gov.uk/portal/servlets/ApplicationSearchServlet?PKID=219108, http://planning.highpeak.gov.uk/portal/servlets/ApplicationSearchServlet?PKID=210350, http://planning.highpeak.gov.uk/portal/servlets/AttachmentShowServlet?ImageName=421938, http://planning.highpeak.gov.uk/portal/servlets/ApplicationSearchServlet?PKID=211408 http://planning.highpeak.gov.uk/portal/servlets/ApplicationSearchServlet?PKID=207208, http://planning.cheshireeast.gov.uk/applicationdetails.aspx?pr=14/4172M, http://planning.cheshireeast.gov.uk/applicationdetails.aspx?pr=13/2765M, http://planning.highpeak.gov.uk/portal/servlets/ApplicationSearchServlet?PKID=154664, http://planning.highpeak.gov.uk/portal/servlets/ApplicationSearchServlet?PKID=208246, http://planning.highpeak.gov.uk/portal/servlets/ApplicationSearchServlet?PKID=216913, http://planning.highpeak.gov.uk/portal/servlets/ApplicationSearchServlet?PKID=210787

en-le-Frith, **47** dwellings (Manchester Rd) in Chapel-en-le-Frith, **122** dwellings (phase 1) in Disley, **39** dwellings (phase 2) in Disley, **91** dwellings (phase 1) in Chinley, **62** dwellings (phase 2) in Chinley, **108** dwellings (north of Dinting Rd) in Glossop and **96** dwellings (Charlestown) in Glossop.

**Conclusion**: with air pollution limits having already been exceeded in High Lane in 2014 (prior to the opening of the A6MARR in 2018 and prior to completion of many of the above developments), the last thing High Lane needs is a mass housing development that will further add to the pollution!

## Environmental and Health Impact

Building a large number of houses in a remote location (12 miles from Manchester; 5-6 miles from Stockport) at the edge of Greater Manchester will necessarily lead to these new residents (all 1100 or so of them plus their visitors) needing to travel greater distances than would otherwise be the case.

Where that location is in an area such as High Lane — with an already congested road (the A6) and very limited public transport — the adverse effects are likely to spiral upwards. With a severe lack of local infrastructure, residents here will typically need to travel quite some distance simply to access many everyday things such as employment, secondary schools, leisure and cultural activities.

Quite apart from the loss of Green Belt land, choosing to build 500 new homes in such a location, rather than in a more urban location (which typically has sufficient infrastructure already in place), would necessarily have a more detrimental effect on the environment because it creates a greater need to travel, and with fewer practical options available, most such journeys are likely to be made by private motoring. Quite simply, it would be a far less sustainable choice.

The GMSF document[1] says, in paragraph 9.25,

> *Healthy life expectancy in Greater Manchester is currently three to four years below the national average for men and women…. The high prevalence of long-term conditions, such as cardiovascular and respiratory disease, means that Greater Manchester residents can expect to experience poor health at a younger age than in other parts of the country.*

The harmful effects of atmospheric pollution upon human health are well recognised and quantified, and include: premature mortality, hospital admissions, allergic reactions, lung dysfunction and cardiovascular diseases.[18]

It cannot be right to progress with a plan that will knowingly result in a significantly increased level of air pollution in an area which already has $NO_2$ concentrations that exceed the legal limit. The planned location of the new homes will undoubtedly extend the length of the traffic tailbacks even further into High Lane and beyond, and further into Hazel Grove in the other direction.

**Conclusion**: High Lane is a poor choice of location for a sustainable development of 500 homes — Green Belt land would be lost and it would be far more environmentally inefficient.

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[18] AIR QUALITY EXPERT GROUP, *Fine Particulate Matter ($PM_{2.5}$) in the United Kingdom*, 2012, Department for the Environment, Food and Rural Affairs, p.9 = p.20 of PDF, https://uk-air.defra.gov.uk/assets/documents/reports/cat11/1212141150_AQEG_Fine_Particulate_Matter_in_the_UK.pdf

## Proportionate Development

Any new housing in High Lane should be proportionate and commensurate with what is sustainable — not on the scale of massive 26% increase,[19] which would completely change the character of the village. The existing infrastructure simply cannot cope with this level of change. There is no need to dramatically increase the number of homes in High Lane.

## Brownfield First

The NPPF states that Green Belt boundaries should only be altered in "exceptional circumstances"[20] and that

> *before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic policy-making authority should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development*.[21]

Furthermore

> *the need to promote sustainable patterns of development should be taken into account*

and

> *first consideration to land which has been previously developed and/or is well-served by public transport.*[22]

The GMSF Site Selection Topic Paper[23] lists seven criteria for choosing Green Belt sites. None of these apply to High Lane. See Appendix 1 (below) for a rebuttal of any such applicability.

## Housing Need

The GMSF Plan[24] requires that in Greater Manchester, "around 201,000 new homes will be required over the [20year] plan period"[25] of 2018-2037. Of these, it says **14,520**[26] will be required in the borough of Stockport. Note that the GMSF uses projections from 2014 (for population[27] and households[28]), rather than the latest projections from 2016. As the 2016 projects are lower (blue lines on the graphs below), this means the GMSF housing need is **overstated**, i.e. larger than is actually indicated by the latest available data.

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[19] 500 new households in addition to the 1904 households already in High Lane, based on the 2011 Census[3].

[20] MINISTRY OF HOUSING, COMMUNITIES & LOCAL GOVERNMENT, *National Planning Policy Framework*, July 2018, paragraph 136, p.40 = p.42 of PDF, https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/740441/National_Planning_Policy_Framework_web_accessible_version.pdf

[21] *Ibid.*, paragraph 137, p.41 = p.43 of PDF.

[22] *Ibid.*, paragraph 138, p.41 = p.43 of PDF.

[23] GREATER MANCHESTER COMBINED AUTHORITY, *GMSF Site Selection Topic Paper*, January 2019, https://www.greatermanchester-ca.gov.uk/what-we-do/housing/greater-manchester-spatial-framework/site-selection-gmsf-topic-paper/

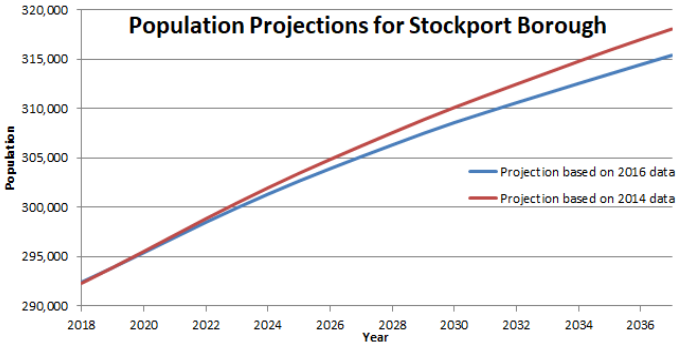
[24] GREATER MANCHESTER COMBINED AUTHORITY, *Greater Manchester's Plan for Homes, Jobs and the Environment: Greater Manchester Spatial Framework*, Revised Draft, January 2019.

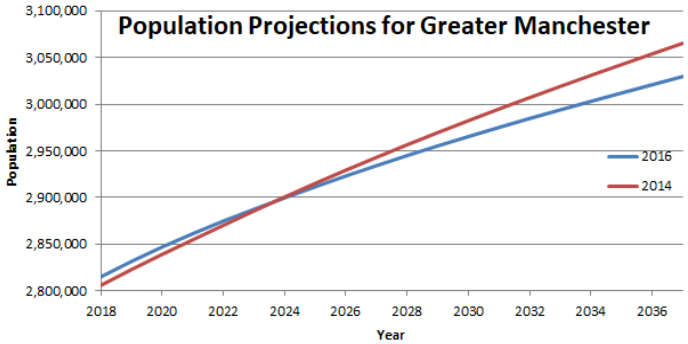
[25] *Ibid.*, paragraph 7.7, p.112 = p.114 of PDF

[26] *Ibid.*, paragraph 7.10 (Table 7.1), p.113 = p.115 of PDF

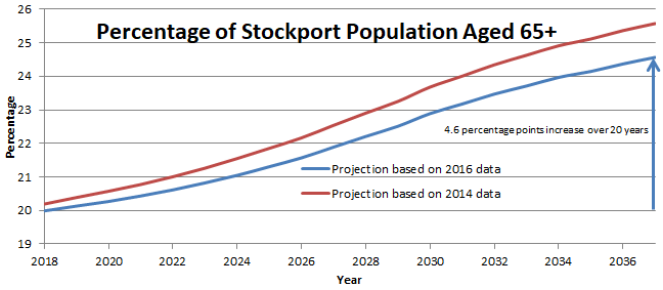
[27] NASH, A., *Population Projections – Local Authorities: SNPP Z1* (2016-based, 2014-based, etc.), 24th May 2018, https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationprojections/datasets/localauthoritiesinenglandz1

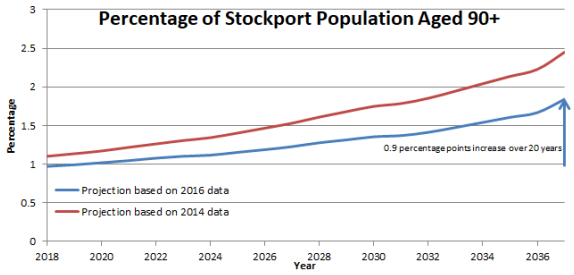
[28] HARKRADER, J., *Household Projections for England* (2016-based), 3rd December 2018, https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationprojections/datasets/householdprojectionsforengland ; 2014-based data (published 12th July 2016) is available from https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/536731/Household_Projections_Published_Tables.xlsx




Similarly, although the population projections for Stockport borough indicate an increased proportion of residents aged 65 and over, the most recent projections in this age group are lower (i.e. less of a change from current levels) than for the 2014 projections used by the GMSF.[25, 26]




In the borough of Stockport, for the 65-and-over category, the change by the end of the GMSF period, according to 2016 projections,[27] is less than 4.6 percentage points; for the 90-and-over category, it is less than 0.9 percentage points.

## Housing Land Supply

Table 7.3[29] shows that when the GMSF Allocations (the 3,700 for Stockport that includes 500 homes on Green Belt land in High Lane) are added to the total identified from other sources, the available supply in Stockport is **15,474**. Given the housing need in Stockport is 14,520 (see above), the **supply exceeds the need** by 954.

Furthermore, in the 5 years following the end of the GMSF period, there is expected to be an **additional supply of 1,479 homes** in Stockport town centre on brownfield land (see Appendix 2 for details).

And this is without taking into account the likely effects of Brexit! The latest population figures (published in June 2018 for mid-2017) from the ONS show that 59%[30] of the population growth between 2016 and 2017 was due to net international migration.

However, since the EU referendum in 2016, the growth rate has slowed to the lowest since mid-2004.[27] And assuming the end of the pre-Brexit conditions that conferred on EU citizens and their family members the right to move and reside freely within the territory of Member States, despite the continuation of an expected net population growth due in part to international migration, the changeover from "unlimited" EU migration to "controlled" international migration is likely to be sufficiently significant as to render the 2014-based (and even the 2016-based) demographic projections of housing need to be over-estimated to at least some extent.

[29] GREATER MANCHESTER COMBINED AUTHORITY, *op. cit.*, paragraph 7.33 (Table 7.3), p.123 = p.125 of PDF

[30] PARK, N., *Population estimates for the UK, England and Wales, Scotland and Northern Ireland: mid-2017*, 28th June 2018, p.3, https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/bulletins/annualmidyearpopulationestimates/mid2017/pdf

Bear in mind that the projections are continuations of current trends — they should *not [be] viewed as predictions or forecasts, but … an indication of the future if recent trends continue*.[31, 32]

These migration trends have been studied by the ONS, which, in its latest report on UK population,[33] says that for immigration increases,

> *these increases have generally coincided with expansions of the EU (where citizens of EU member states have freedom of movement between other EU member states, facilitating migration to the UK).*

In the ONS's most recent (June 2018) statistical bulletin for UK population estimates, it says:[34]

> *the largest inflow of immigrants to the UK was from Romania (50,000) followed by China, India, France and Poland*

Given the demonstrated existence of a sufficient supply of brownfield land in Stockport borough to meet the growing housing need, there seems to be little evidence of the "brownfield first" policy[35] being applied to High Lane.

The reasons underpinning the importance of Green Belt land should not be forgotten. These include:[36]

- *to check the unrestricted sprawl of large built-up areas;*
- *to prevent neighbouring towns merging into one another;*
- *to assist in safeguarding the countryside from encroachment;*
- *to preserve the setting and special character of historic towns; and*
- *to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.*

The proposed removal of Green Belt land in High Lane would leave only a thin strip of separation from the current edge of the Manchester conurbation, i.e. the Greater Manchester Urban Area agglomeration zone.[37] Indeed, the Design and Access Statement for the A6MARR says[38]

*The area represents an important green buffer between the more settled landscape to the west with the more nucleated settlement of High Lane that is representative of the settlement pattern along the Pennine fringe.*

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[31] GOV.UK, *Household Projections*, 24th January 2017, https://www.gov.uk/government/collections/household-projections

[32] PEREIRA, R., *What our Household Projections Really Show*, 19th October 2018, https://blog.ons.gov.uk/2018/10/19/what-our-household-projections-really-show/

[33] COATES, S., *Overview of the UK Population: November 2018*, Section 5: Why is the Population Growing? Net Migration, https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationestimates/articles/overviewoftheukpopulation/november2018#why-is-the-uk-population-growing

[34] PARK, N., *op. cit.*, p.7

[35] GREATER MANCHESTER COMBINED AUTHORITY, *Greater Manchester's Plan for Homes, Jobs and the Environment: Greater Manchester Spatial Framework*, *op. cit.*, paragraph 1.16, p.9 = p.11 of PDF.

[36] MINISTRY OF HOUSING, COMMUNITIES & LOCAL GOVERNMENT, *op. cit.*, paragraph 134.

[37] DEPARTMENT FOR ENVIRONMENT, FOOD & RURAL AFFAIRS, DEPARTMENT FOR TRANSPORT, *Air Quality Plan for Tackling Roadside Nitrogen Dioxide Concentrations in Greater Manchester Urban Area (UK0003)*, July 2017, p.6, https://uk-air.defra.gov.uk/assets/documents/no2ten/2017-zone-plans/AQplans_UK0003.pdf

[38] URS INFRASTRUCTURE & ENVIRONMENT UK LTD., *A6 to Manchester Airport Relief Road: Design and Access Statement Volume 1: Full Statement*, 1007/6.15.2/180, October 2013, p. 13, http://a6marr.stockport.gov.uk/746597/760095/762642

**Conclusions**:

- The GMSF's own figures show that the available land for housing supply exceeds the housing need in Stockport by 954 homes.
- A brownfield capacity of nearly 1500 homes in Stockport has already been identified for the period beyond the 20-year GMSF plan.
- The GMSF figures for housing need are higher than necessary because
    - they are based on 2014 housing projections; 2016 projections are lower; and
    - they do not take account of foreseeable changes in housing need, such as an expected further reduction in the rate of population growth due to Brexit.

Hence a housing need sufficient to justify the release of Green Belt in High Lane does not exist.

## Summary

High Lane already suffers from a congested main road (the A6) with high pollution levels that exceed the legal limits. It lacks the amenities, employment opportunities and transport infrastructure to support an increase in population and housing on the scale that is proposed by the GMSF. Quite simply, this congested and isolated village is entirely unsuitable for such a large number of additional homes, and a change on this scale would destroy the existing character of the village.

Finally, based on the evidence listed in this consultation response, including the GMSF's figures for housing need and supply, there is no justifiable case to be made for removing land in High Lane from Green Belt protection.

# Appendix 1

The GMSF Site Selection Topic Paper[39] lists seven criteria for choosing Green Belt sites. However, I contend that none of them are applicable in the case of the proposal to build 500 new homes in High Lane on Green Belt land, and so there is therefore no valid justification for claiming "exceptional circumstances" to release this Green Belt land. Each criterion is addressed below.

1. Not applicable — High Lane is not well served by public transport. There is no tram service whatsoever. The closest railway station is Middlewood, but it has no vehicular access, and pedestrian access is via unlit muddy tracks within woodland; the service is approximately two-hourly.[40] At peak times, it is well known that the trains are overcrowded, but the limited platform length constrains the trains to a maximum of four carriages.[41]

   There are **no TfGM** bus services in High Lane. The main bus service is the **199 Skyline**[42], run by High Peak Buses, which runs approximately half-hourly during the day, or approximately hourly in the evenings, Sundays and bank holidays. It connects Buxton to Hazel Grove, Stockport and Manchester Airport. High Peak Buses' TP service no longer runs through High Lane. Its other service of relevance to High Lane, the **394**[43], comprises 6 buses per day on weekdays only (at approximately two-hourly intervals) per direction between Glossop (via Marple) and Stepping Hill Hospital. Apart from school buses, the only other scheduled bus service that stops in High Lane is Stagecoach's **360**[44] that comprises a single bus per day (weekdays only) in one direction only (to Hayfield), at around 5:34 in the morning.

2. Not applicable — the land cannot "take advantage of the key assets and opportunities that genuinely distinguish Greater Manchester from its competitors".

3. Not applicable — the land is not proposed to be used for anything other than residential purposes and such use would hinder, not improve, the connectivity of Greater Manchester.

4. Not applicable — the land is not within 800 metres of a main town centre boundary.

5. Not applicable — High Lane is not in an urban location, so urban regeneration does not apply.

6. Not applicable — there is no proposed developer investment in transport. The lack of proximity of High Lane to amenities, leisure facilities, and employment centres, coupled with its lack of any continuous cycle routes, means that it is a very poor choice for a location that can support sustainable travel options.

7. Not applicable — there are no major local problems or issues that releasing this land from Green Belt would solve. The housing need in High Lane does not require 500 new homes to be built. The figures in the GMSF show that there is more than sufficient housing land supply in Stockport (see Housing Land Supply).

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[39] GREATER MANCHESTER COMBINED AUTHORITY, *GMSF Site Selection Topic Paper*, January 2019, https://www.greatermanchester-ca.gov.uk/what-we-do/housing/greater-manchester-spatial-framework/site-selection-gmsf-topic-paper/

[40] NETWORK RAIL, *Buxton and Hazel Grove – Manchester*, Table T086-F, December 2018 Edition, https://www.networkrail.co.uk/running-the-railway/timetabling/electronic-national-rail-timetable/

[41] ATKINS, SMBC, Atkins / SMBC, *Stockport Rail Strategy*, Document 5129010, Version 12, 19th January 2015, p. 9, http://www.mcrua.org.uk/chairmansblog/wp-content/uploads/2015/01/Stockport-Rail-Strategy-January-2015.pdf

[42] HIGH PEAK BUSES, *199 Skyline Buxton – Manchester Airport*, 22nd July 2018, http://www.highpeakbuses.com/skyline%20199

[43] HIGH PEAK BUSES, *394 Glossop – Stepping Hill*, October 2017, http://www.highpeakbuses.com/394

[44] STAGECOACH, *Stockport – Hayfield 360, 358*, September 2018, https://tis-kml-stagecoach.s3.amazonaws.com/PdfTimetables/XJAO360.pdf

# Appendix 2

SMBC have recently recognised

> *the changing shopping habits of the public and the need to diversify the usage of property in the Town Centre, including introducing a more residential provision*

leading to proposals for the **Merseyway** redevelopment[45] in the town centre of Stockport.

This is separate from another major redevelopment area of the town centre called the **Town Centre West Development**[46] — 3000 dwellings in a new urban village on brownfield land totalling 130 acres in five areas:

- Station Quarter
- Weirside Village
- Brinksway
- Stockport Exchange Business Quarter
- Royal George Quarter

that is proposed to be run Greater Manchester's first Mayoral Development Corporation (MDC).

Stockport's 2018 SHLAA[47] takes account of both of these developments (collectively identified as Town Centre Living), giving a **total of 5,000 new dwellings** over a 25-year period.[48] However, given that the GMSF Plan covers only 20 years, the SHLAA estimates that the supply within the GMSF time period will be 3,521 dwellings, and this is the figured carried through (as a total of 5,105 mixed (brownfield/greenfield) development, when combined with the other developments listed in Appendix 4 of the SHLAA) into the GMSF Plan (in the table in paragraph 7.33).

In other words, five years beyond the GMSF time period, it is expected that there will be brownfield land available in the Stockport town centre for a further 1,479 homes.

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[45] SMBC, *Cabinet Meeting Minutes*, 13th November 2018, Item 10, "Town Centre Regeneration – Merseyway Redevelopment", http://democracy.stockport.gov.uk/documents/g26245/Printed%20minutes%2013th-Nov-2018%2018.00%20Cabinet.pdf?T=1

[46] GMCA, *Mayoral Development Corporation - Regenerating Stockport's Town Centre West*, Consultation, 14th January 2019 to 10th March 2019, https://www.gmconsult.org/communications-and-engagement-team/mdcstockport/

[47] SMBC, *Strategic Housing Land Availability Assessment, SHLAA 2018*, December 2018, Appendix 4, p.70 = p.74 of PDF, https://s3-eu-west-1.amazonaws.com/live-iag-static-assets/pdf/LDF/Housing+Land/2018+SHLAA+Report+and+all+appendices.pdf

[48] *Ibid.*, p.10. = p.14 of PDF.