Response by High Lane Residents Association to the Consultation on the Draft Greater Manchester Spatial Framework, Proposed Development in High Lane

Background

High Lane Residents Association is a long established and recognised body of local homeowners and business people. Membership is conferred on all residents and business owners as of right and there is also a subscribing membership.

The Residents Association has been a consultee on all significant developments in the village as well as, principally through its monthly open meetings, providing a liaison channel with residents for councillors, police and other bodies.

The Residents Association has participated in a number of well attended meetings since this development proposal was announced, has leafletted the whole village with details of the proposal and how to participate in the consultation and has held surgeries to assist local residents who do not have ready access to details online. The Association has also conducted a brief survey, mainly by email given the short timescale. Whilst the survey cannot claim to fully reflect the views of the whole village, it gives a clear flavour of the level of concern.

1. Lack of adequate consultation and information

- 1.1 Many residents have commented on the inadequacy of the consultation and information process which has been almost entirely reliant on online content, leaving many residents to come very late into the process after Residents Groups and Councillors have alerted them. It is unclear why the development of the A6MARR, for example, merited posted consultations and information to every affected household and these proposals did not. Although an extension to the consultation period has been agreed this is still short given the intervention of the holiday period and the slow and inadequate dissemination of information to residents.
- 1.2 We note that the absolute lack of detail in this proposal and the short timescale (even to 16 January 2017 given the public holiday that intervenes) make it very hard to respond with detailed planning objections as there are only sketchy comments in the GMSF papers supplied on compensatory infrastructure projects and we cannot see ways in which some fundamental objections (more detail on these below) can be overcome. The paper supplied states that proposals 'must make provision for supporting infrastructure, facilities and environmental mitigation' but lacks any detail on what this might involve for a proposed 4000 house development or on the timing. Whilst precise dates could of course not be given, intended timing in relation to the progress of actual house building could have been given.
- 1.3 Not only are the aspirations on infrastructure vague, but few detailed comments are made on environmental features to be preserved, on water course disturbance, on mineral resource, or the fact that rail tunnel land and historic mine workings run through the site. A Green Belt Assessment dated July 2016 and a Flood and Water Management Paper dated October 2016 strongly suggest that insufficient time for consideration of any findings before site proposals were made. There is no satisfactory evidence offered that any of these vital practical factors have been thoroughly considered.
- 1.4 On a wider note, the timing of various other key developments, lacking as it does any coordination, appears both potentially very wasteful in planning terms and also renders it

extremely hard to make the judgements required at the moment. Specifically, the A6 MARR mitigation measures which may be rendered less effective if this development happens, the uncertainty about the continuation of the A6 MARR to Bredbury, the incomplete brownfield register, all bear massively on judgements about this proposal, which are therefore premature.

1.5 In summary we believe there is a case for consultation on plans only after all the above issues have been addressed and information made available in a clear and coherent way accessible to all residents online and offline.

2. Inadequacy of the Housing Needs Assessment

- 2.1 Numerical challenges. The Needs Assessments forms the basis at every level for these initiatives and these are being challenged by a variety of experts. The housing and employment needs assessment of the GMSF is being challenged by the CPRE and other expert opinion which suggest a minimum over estimate of 30,000 across Greater Manchester.
- 2.2 Greenbelt last. If the projections prove to be excessive, clearly brownfield development should be prioritised. If as is likely greenfield sites prove quicker and more profitable to develop, and are allowed to be taken first, it is likely that we will lose much greenbelt unnecessarily. No measures to prevent this are proposed.
- 2.3 Fitness of the High Lane site to meet the stated needs. The High Lane proposed development is purely housing (and possibly associated infrastructure) to meet projected housing shortfall. The site is a considerable distance from areas identified for economic development and significant employment, so it appears no other justifications for this development are offered. Apart from the overall needs assessment, principles stated like urban regeneration one of the 5 justifications for green belt are not met by building here rather than in existing population and employment centres where building upwards is an under-considered option.
- Affordable housing. A key justification for the housing projections is the need for more affordable housing, but littered through the document are clues that this may not be realised on this site. Phrases like 'providing a competitive return to the landowner' and 'will be attractive to the housing market', combined with a failure to convince on environmental concerns, suggest that this proposal takes more cognisance of the needs of developers than the public, whether they are already in High Lane or trying to afford a home
- 2.5 Long term affordability. 'Affordable' developments need to minimise additional costs to their residents such as transport to employment and other essential services. This site would entail most people affording to have and regularly use their own transport to reach such services.
- 2.6 There is no evidence that the proposals link to potential availability and suitability of sites. For example, the proposals do not appear to link to the earlier 'Call for Sites'. Although we do not believe that this exercise should be a major determining factor for development, it is hard to see what other assurances there are that building plans are likely to be deliverable.

3. Greenbelt encroachment

- 3.1 The greenbelt threatened by this development fulfils 4 of the recognised 5 justifications for greenbelt in the National Planning Policy Framework and it is the case that overall housing need alone does not constitute an 'exceptional circumstance' for release of a site.
- 3.2 One of the principal justifications for defence of the greenbelt is stopping the spread of urban sprawl. High Lane is situated on the outer edge of the Manchester conurbation and the greenbelt here serves exactly that purpose. The Green Belt Assessment for Stockport Borough specifically highlights the green belt around High Lane as being strategically important in preventing encroachment and coalescing of settlements.
- 3.3 Maintaining separation between distinct settlements is one of the key aims of greenbelt but the nature of this development will be to make a close to continuous development encompassing Hazel Grove and Marple via High Lane.
- 3.4 The papers supplied talk of 'minimising the effects on remaining greenbelt'. Given that the green separation between Hazel Grove, the current edge of the conurbation, and High Lane is already affected by the A6MARR, this further assault reduces the green belt 'barrier' to a very thin strip which could easily become extremely vulnerable after this development on the grounds that it is too limited to fulfil its major justification. Further, looking at the development record of Cheshire East (e.g. the massive Handforth development), there is no room for complacency that greenbelt the other side of the boundary will remain intact if rules are perceived to be relaxed.
- 3.5 It is generally stated that greenbelt should have strong, recognisable and defensible boundaries. Reduction of the greenbelt around High Lane as proposed leaves no such clear boundary logic, increasing the probability of further encroachment.
- 3.6 Even for those people prepared to accept some development on the greenbelt, much more evidence would be needed that all brownfield sites had been fully exploited, not only in Stockport but across Greater Manchester. It is very clear, and planners admit, that there is no fully up to date register of brownfield sites. The CPRE has recently released a report on the value of greenbelt and the threats to it. Their recent research emphasises the potential of brownfield suggesting scope for 1.1 1.14million houses across the country. The government has only recently committed local authorities to a pilot brownfield register and it is clear that local authorities are, by their own admission in Stockport's case at least, some way from having a complete picture of brownfield availability. CPRE have commented on the very limited investment in brownfield development (just £6m overall for Manchester, Liverpool and Preston). Our view would be that much more work needs to be demonstrated both on identifying sites and encouraging development on them before consideration is given to greenbelt development.
- 3.7 This development is a very strong example of the threat to green belt generated by national policy and should be regarded as a significant test case on the ability of local councils to resist incentives to build on greenbelt where this can be avoided. In addition, policies are in place which disincentivise regeneration over new build. New Homes Bonus is a tempting way for councils to boost funds and the temptation to get the 'quick ticks' for building on green field sites is understandable but unhelpful. Coupled with fear of the costly risk of being overruled nationally if they refuse greenbelt development, and the lack of national grants to incentivise clearance of brownfield sites to encourage development, these factors mitigate toward the 'quick fix' of greenbelt development which is already gathering pace. As Ministers, George Osborne repeatedly tried to encourage green belt 'swaps' to facilitate release and Sajid Javid has said he will back councils like

Birmingham who have taken greenbelt for development. Resistance to this substantial assault on the greenbelt (major in a national as well as local context) would set an important precedent.

4. High Lane village character

- 4.1 The papers provided talk about 'respecting ...qualities that create a sense of place or local character'. The proposal places 20% of Stockport's proposed housing quota on a community which currently houses below 2% of the population. It would increase the village to three times its current size with continuous development, changing the nature fundamentally and reducing one of the major greenbelt corridors to a size where its value would be critically undermined both as a vital element of environmental balance as well as a critical element in forming the character of the village and of neighbouring Marple as separate communities which look equally toward the Peak District foothills.
- 4.2 An important theme from residents both in our survey and at meetings has been that they choose to live in High Lane because of its character, which will be fundamentally changed by building on the proposed sites at any scale. If the site is seen as 'attractive to the housing market' it will by definition change the village's character because the market attracted must be for a different character of settlement (namely one three times the current size).
- 4.3 Given the ambition to work round existing and natural features, the watercourses and pools shown on the Ordnance Survey map make this a challenge and it is difficult to see how the multiple rural footpaths would survive as providing the same kind of access to natural habitat and landscape for local residents as they do now.
- The Macclesfield Canal is a significant heritage and leisure feature for residents, walkers, cyclists and boaters. The whole length of the canal is a conservation area. Bridges 6 (Windlehurst Road) and Bridge 9 (Andrew Lane) are Grade II listed and heavy construction traffic would also present a problem. Andrew Lane bridge has already been protected from the impact of Water Treatment Works construction traffic. Avoidance of either bridge, even if possible, would simply add to the problems of the additional pressure on the A6. The development as proposed would affect the environs of this amenity significantly. Further, some of the affected length of canal is on an embankment and there are legitimate concerns about the effects of nearby development on its stability.
- 4.5 The paper provided speaks of 'maximising the integration with existing neighbourhoods and communities' and 'inclusive developments that meet the needs of local areas' as well as using walking opportunities to facilitate this. It is highly unlikely that many people would walk uphill from the development into High Lane centre, especially as the document also talks of plentiful provision of housing for older people. Even over this distance we can be sure that cars will be the principal vehicle of movement.
- There is an aspiration to limit carbon emissions but where is the research on the current effect of the A6, the increase that will generated by A6MARR and the potential effects of this development? It is hard for residents to contest this when this information is not readily available. However, it is obvious that 4,000 homes will mean between 6 and 8.000 additional cars joining an already congested and polluted road and increase the already significant traffic through the village both on the A6 and on Windlehurst Road and Andrew Lane. It is worth noting that the Department of Transport's A6 study for Disley and High Lane as far back as 1988 stated that by the mid-1990s the traffic on the A6 would exceed the practical capacity of the road, causing severe environmental impact on local communities. The weight of traffic has worsened since then and no significant relief or upgrading has happened.

5. The objectives of the GMSF and Stockport Planning are not met

- 5.1 The proposal would contribute nothing to several stated objectives of the GMSF for example urban regeneration, congestion limitation and pollution reduction. This is a rural site and as such cannot contribute to urban regeneration.
- 5.2 Development in High Lane does not fulfil Stockport Borough's stated aspiration for town centre growth, regeneration and provision of integrated sustainable employment and housing.
- 5.3 Clearly, even if a school, surgery and limited shops were part of the plan, most people living there would have to use cars to get to places of employment and main shopping areas thus increasing congestion and pollution.
- 5.4 The development would not be, for many residents, within walking distance of existing facilities like schools, clinic, pharmacy and shops in High Lane, so most people here would be using cars even for those short journeys, increasing pollution and congestion.

6. Transport Infrastructure

- 6.1 The tram train idea floated could not happen for many years according to representatives on GMT and is specifically not welcomed by a significant number of respondents to our survey because
 - (a) it would not improve access to Stockport and, for example, our hospital, where most residents would need to access in the case of illness or accident. Hospital facilities at Stepping Hill are already stretched and planned job cuts and ward closures are compounded by likely closures at Macclesfield
 - (b) it would encroach environmentally on the Marple end of the Middlewood Way a vital and well used green lung for residents of Marple and High Lane for walkers, riders and cyclists.
 - (c) there is no evidence that the plan could happen quickly and if, as suggested, it was extended to Hazel Grove, this would make it an even longer and more complex and expensive project.
 - (d) The paper provided states that 'the provision of a tram-train link to the area is a prerequisite for its delivery' but this does not mention extension to Hazel Grove, neither does it state that the line must be actually up and running before building commences. As such it is a meaningless 'guarantee'.
 - (e) The only conceivable economic justification for a building project here would be if there were very strong transport links to Stockport as residents should surely be encouraged to focus on shopping and working in Stockport from a convenience, sustainability and an economic regeneration viewpoint.
- 6.2 The paper talks about 'suitable access to the A6' but gives no indication what this might entail or how it links with the additional traffic complications of the A6MARR. Generally accepted estimates show that traffic on the A6 through High Lane after the opening of MARR will increase by not less than 20% on an already polluted and overcrowded stretch of road without adding 4,000 homes and up to 8,000 cars. A number of residents have referred to the fact that currently there is no GMPTE bus service route through High Lane along the length of the A6 and serving Stockport and that there is no pedestrian

- accessible rail station or frequent service from Middlewood in any case. Massive investment in advance of housing development would be needed.
- 6.3 The proposal seeks to put housing at a 30 per hectare density to the north part of the site with no indication how residents would access the A6 trunk road. Windlehurst Road and Andrew Lane do not currently present a viable option and have no scope for expansion no consideration has apparently been given to this in the proposal.
- 6.4 The proposed higher density of 50 per hectare fronting the A6 will inevitably exacerbate the problems of all traffic accessing and using the A6 unless a new access to A6 MARR were to be created, thus destroying the remaining vulnerable stretch of greenbelt. This would not be acceptable for all the reasons already covered.
- 6.5 The effects of historic mining activity in the area appear to merit only a passing mention but mapping clearly shows the presence of mineral seams across the area. Along with the rail tunnel there are surely significant risks in placing more housing at this density on the site.

Summary

Our main concerns are about a development which would swamp the village, destroy the viability of valuable local greenbelt and still fail to meet the fundamental stated objectives of the Spatial Framework on sustainability, pollution and urban regeneration. But even ignoring these major issues, this development would necessitate a massive investment in public transport – far more than the distant promise of a tram train. This along with other infrastructure provision for health, education, retail, flood mitigation and possible geological complications related to tunnel and mining would make it inevitable that developers would seek to negotiate down on the 'essential' infrastructure items to keep the project profits viable. Promises made in the GMSF proposals do not negate residents' fundamental objections and in addition are insubstantial and lack practical credibility.

High Lane Residents Association 9 January 2017