

High Lane Residents Association

Response to Consultation

Revised Draft Greater Manchester Spatial Framework, January 2019

To:

Planning Team Consultation,
GMCA,
Churchgate House,
56 Oxford Street,
Manchester, M1 6EU

Submission to GMSF Consultation on the revised proposals for development in High Lane, Stockport, March 2019

Submitted on behalf of High Lane Residents Association by Hilary Stephenson, Chair.

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In particular, this Submission relates to Policy GM Allocation 38, 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 High Lane 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 included on its website details of the proposal and how to participate in the consultation. It has pinpointed ways in which local residents who do not have ready access to details online can access and respond. The Association has been working with other local groups on ongoing concerns about traffic, air quality and transport links.

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1. Lack of overall strategic plan

- 1.1 The timing of various other key developments such as SEMMMS refresh, Stockport revised Local Plan, potential A555 extension, all lacking any apparent overall co-ordination, appears both potentially very wasteful in planning terms and also renders it extremely hard to make the judgements required at the moment.
- 1.2 The effects on High Lane of the newly opened A555 extension, terminating just up the road from the proposed development, are only just beginning to be assessed and the effects on traffic queues, slowing traffic, causing more pollution and rat running, are totally evident but without any viable solution at present to their detrimental impact on the village.
- 1.3 The uncertainty about the continuation of the A555/A6MARR to Bredbury, the lack of funding for a High Lane / Disley bypass, the steady erosion of public transport, the incomplete brownfield register, all bear massively on judgements about this proposal, which are therefore premature, particularly as the proposal involves what would become permanent changes to the Green Belt.
- 1.4 In summary we believe there is a case for consultation on development plans and the need to release Green Belt land only after all the above issues have been addressed with co-operative working between those who have power over finance for transport, roads, health and education. Information should then be made available in a clear and coherent way accessible to all residents online and offline on which they could make judgements about the sustainability impact of any substantial development plans in this area.

2. Current proposals – lack of detail and guarantees

- 2.1 There are elements of the revised proposals that merit positive mention and are welcomed. The proposals are for reduced numbers of dwellings, though still substantial. The proposed area north of the A6 has a reduced footprint and the difficulty with proximity to the rail tunnel now recognised. More development has been planned for central Stockport which is much more in line with the need to locate development close to jobs and transport. More is said about infrastructural issues though there remains a lack of detail on how timescales and enforcement on developers would happen and many of the infrastructure points made in the strategic allocation lack guarantees that they can be delivered in a timely fashion before housing development, or even at all.
- 2.2 We note that the absolute lack of detail in this proposal makes it very hard to respond with detailed planning objections. We are conscious that this can easily be deflected by pointing out that the GMSF proposal is only on the areas which can be designated and released (if Green Belt, like the High Lane land) to developers. Even though we will argue that the proposal is over-development and does not meet the GMSF's own stated criteria, the devil, even for a reduced development is, at least partly, in the detail and enforceability of timings.
- 2.3 The intent that much of the details of infrastructure would lie at the specific planning stages with the relevant local authority, in High Lane's case Stockport MBC, does not enable residents to have the necessary confidence that it would happen as, even if the will were there, the release of Green Belt, the costs, limitations in planning law and the pull of incentives from government like the new homes premium all mitigate in favour of making enforcement of aspirations against planners and developers very difficult if not impossible.

- 2.4 Public transport is Greater Manchester wide (and beyond in the case of High Peak buses and railway franchises) so aspirations on these matters cannot necessarily be delivered. The draft schemes included in the supporting Greater Manchester Transport Strategy offer little if anything for High Lane and its location on the very extremity of the GM boundary does not assist in it receiving the benefits.
- 2.5 The aspirations on other infrastructure are vague on specifics for this area. It remains the case that there are few detailed comments on environmental features to be preserved, on water course and habitat disturbance, on mineral resource. There is little satisfactory evidence offered that any of these vital practical factors have been thoroughly considered. Though the changes in site location since the 2016 proposal indicate that the tunnel issue has at least now been considered.

3. The objectives of the GMSF and Stockport Planning are not met (see also Appendix 1)

- 3.1 The proposal for High Lane would contribute nothing to several stated objectives of the GMSF for example urban regeneration, congestion limitation, Streets for All, and pollution reduction. This is a rural site and as such cannot contribute to urban regeneration.
- 3.2 Of the seven criteria for development given in the proposal, the only one of the criteria which the proposal suggests High Lane meets is criterion 7. This criterion is only met if a very wide definition of 'local', covering the whole of Stockport at the very least, is taken. We have concerns as to how GM has arrived at its decision to include the High Lane Allocation through its Site Selection process, given the significant constraints of the location. This is explained in more detail in our *Appendix 1*.
- 3.3 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.
- 3.4 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. The plan lacks credible and sustainable public transport options for High Lane.
- 3.5 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.

4. Housing Needs Assessment and Housing Types

- 4.1 Numerical challenges. The Needs Assessments that form the basis at every level for the initial proposals were challenged by a variety of experts whose figures have clearly been considered as there has been some revision. Although the number of dwellings needed across the area was reduced in the 2019 revision, the planners have been forced to go ahead on higher numbers than calculated. This has meant that pressure to build substantial estates on High Lane's Green Belt have remained, but unnecessarily so on the more recent numbers.
- 4.2 Fitness of the High Lane site to meet the stated needs. The High Lane proposed development is purely housing (and possibly some limited associated infrastructure) to meet housing shortfall. The site is a considerable distance from areas identified for economic development and employment. 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 still an under-considered option.

- 4.3 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. The lack of credible commercial balance between affordable housing, a significant requirement for funding new infrastructure and a return for developers, combined with a failure to convince on environmental concerns, suggest that this proposal will ultimately take more cognisance of the needs of developers than the public, whether they are already in High Lane or trying to afford a home.
- 4.4 Long term affordability. There appears to be general agreement locally that High Lane could benefit from a limited amount of suitable housing, specifically affordable housing for young couples and smaller properties or apartments, possibly some of it sheltered, to enable the substantial older population to downsize and free up existing property. There is absolutely no guarantee that such priorities will be enforced given the ability of developers to use the argument of economic viability when seeking planning permission. This has recently happened in Marple Area and there is no reason to suppose it would not happen again unless planning law was reformed in the favour of the local authorities and residents rather than developers.
- 4.5 'Affordable' developments need to minimise additional costs to their residents such as transport to employment, schools, health and other essential services. This site would require most people needing to be able to afford to have and regularly use their own transport to reach such services, adding to the costs for the individual as well as the environment.
- 4.6 Current definitions of 'affordable' put even these homes out of the reach of many of those most in need and of course there is no enforceable limit of the cost when the homes are sold on and enforceable restraints on extensions.
- 4.7 The substantial additional site proposed in these revisions would, being on the other side of the A6 from the first, add significantly to traffic challenges that appear to have been ignored.

5. Village character, existing facilities and proportionality of development

- 5.1 There is mention of 'respecting ...qualities that create a sense of place or local character'. The proposal still places 13.5% of Stockport's proposed housing quota on a community which currently houses below 2% of the population. It would increase the village size by 25% with continuous development, changing the nature fundamentally and reducing an important Green Belt corridor 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 and Hazel Grove as separate communities which look equally toward the Peak District foothills, Stockport and Manchester.
- 5.2 High Lane currently has a population of around 4,200 (latest ONS estimate) and around 2,000 dwellings. Whilst there is acceptance that some development will be needed in the plan life of GMSF, it is hard to see that an increase of any more than 10% could be appropriate on a single rural village separated from other villages and townships. Our evidence from meetings and surveys is that an absolute maximum of 200 new dwellings over

the plan life of GMSF might be considered appropriate by a significant number of residents and interestingly this is in line with what is happening in the neighbouring Cheshire East village of Disley with its spatial allocation. It is also the case that a significant other group of residents consider a much smaller number of new homes to be appropriate, along with a very specific direction that these should be affordable and that provision for our aging population to downsize be given, be it sheltered, serviced or simple low maintenance build. High Lane has a Neighbourhood Forum, designated pursuant to the Localism Act, that has been preparing a Neighbourhood Development Plan for High Lane. Its research and engagement with the local community has identified the scale, type and most suitable/sustainable locations for development, taking account of the constraints, summarised in its Issues and Options Paper. We consider it vital that GM and Stockport planners consult with the Neighbourhood Forum to take advantage of, and account for, this information and so avoid inappropriate and unsustainable decisions about future development in High Lane.

- 5.3 The concentration of development in two quite substantial sites, whilst more economic to build, is difficult to assimilate. Five or more much smaller dispersed developments across the south east of the borough, including possibly two or three in High Lane, would seem more sensible, more proportionate and undoubtedly more sustainable. Appended is one such suggested potential development which has been put forward locally and which has significant merits and potentially good transport spin offs (*see item on rail services below 7.4 and our Appendix 4*). Any scheme will have winners and losers, but we would hope this and similar suggestions would be looked at seriously as an alternative part of an overall smaller and more proportionate allocation.
- 5.4 Both of High Lane's primary schools are at full capacity already and extension would be impossible in one case and extremely character changing in the other. In addition to which it is unlikely that children would walk to school from the sites of the proposed new developments without considerable thought to safe off-road routes, which are not obvious and would involve walks of around half an hour for small children. There is no secondary education provision in High Lane.
- 5.5 The papers speak of the site lying 'close to the existing centre of High Lane and providing good access to local services'. The siting of the proposed new estates on the edge of the village, downhill from its services such as shops, library, social and medical centre facilities means its suitability for older residents is in question and is likely to encourage more car traffic and probably less integration with the village as people look to Hazel Grove and beyond instead.
- 5.6 The absence of any off-A6 safe cycling routes to key destinations means that many of those willing to use alternative transport or to walk are unlikely to welcome the prospect.
- 5.7 An important theme from residents both in our earlier 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 significantly bigger than currently and with a likely 1,100 more people sharing already stretched services and adding to congestion.

- 5.8 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.
- 5.9 There is a growing, if belated, aspiration to improve air quality and limit carbon emissions and although measures are being increased to monitor the effects, we already know we are in a red zone for pollution and making this worse is a significant issue for residents. There is a current disconnect between the Greater Manchester Air Quality Action Plan and development of any significant size in High Lane (*see our accompanying Appendices 2 and 3*).

6. Green Belt loss and encroachment

- 6.1 The Green Belt threatened by this development fulfils 4 of the recognised 5 purposes / justifications for Green Belt in NPPF and it is the case that overall housing need alone does not constitute an 'exceptional circumstance' for release of a site. Paragraph 136 of the NPPF requires that Green Belt boundaries should only be altered where exceptional circumstances *are evidenced and fully justified*. With regard to the circumstances of High Lane, the case put forward by GMSF in paragraph 6.39 of its supporting Green Belt Topic Paper is unconvincing, not least in terms of the assertion made in the fourth bullet point of that paragraph.
- 6.2 One of the principal justifications for defence of the Green Belt is stopping the spread of urban sprawl. High Lane is situated on the very outer edge of the Greater Manchester conurbation and the Green Belt 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.
- 6.3 Just a few hundred yards from High Lane's border we find ourselves in Poynton, in Cheshire East where development is not controlled by GMSF or Stockport and where the land is very far from the planning centre of the local authority. Looking at the development record of Cheshire East (e.g. the massive Handforth development), there is no room for complacency that Green Belt the other side of the boundary will remain intact if rules are perceived to be relaxed. Given also 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 thinner strip which could easily become extremely vulnerable after this development on the grounds that it is too limited to fulfil its major justification. It is all the more important that Green Belt separation around High Lane, that GM and Stockport do control, is protected and not eroded.
- 6.4 Compensatory Green Belt replacement shown in the proposals are not situated near High Lane and cannot compensate local residents for their loss.
- 6.5 'Green Belt last' – this is a flawed aspiration. If the housing needs projections may prove eventually to be acknowledged as excessive, clearly brownfield development should and must be prioritised and enforced. Not only is the statement that elements of this plan may not happen for twenty years optimistic given the continuous challenges, but it is easy to see that, given the chance of development on prime virgin Green Belt land rather than on brownfield, developers will snatch the opportunity of the Green Belt land first, so protection against this is needed.

- 6.6 Even for those people prepared to accept some development on the Green Belt, much more evidence would be needed that all brownfield sites had been fully exploited first, not only in Stockport but across Greater Manchester. It is very clear, and planners admit, that there is still no fully up to date register of brownfield sites. The CPRE's report on the value of Green Belt and the threats to it emphasises the potential of brownfield suggesting scope for 1.1-1.14 million houses across the country. In 2016 the government had only recently committed local authorities to a pilot brownfield register and it is clear that local authorities must be, by their own admission in Stockport's case at least, still some way from having a complete picture of brownfield availability. They also have limited powers and means to enforce sale of derelict sites. CPRE have commented on the very limited investment in brownfield development.

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 Green Belt development.

- 6.7 This proposed 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 Green Belt 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 development, and the lack of national grants to incentivise clearance of brownfield sites to encourage development, these factors mitigate toward the 'quick fix' of Green Belt development which is already gathering pace. The mooted 'green belt swaps' do nothing to lessen the arguments for the preservation of High Lane's Green Belt as there are no opportunities to compensate for loss in this area.

7. **Transport infrastructure**

- 7.1 The 'tram train' idea floated could not happen for many years according to representatives on TfGM and in the revised proposals it is no longer intended not come as far as High Lane in any case so the issue of fast alternative reliable public transport to Stockport and to Manchester is unresolved. We are not advocating that it should have done so as to result in the loss of the Middlewood Way and the failure of the plan as outlined below still applies.

(a) for High Lane 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) there is no evidence that the plan could happen quickly and even if it was ever extended to Hazel Grove, this would make it an even longer and more complex and expensive project.

(d) Timing is not stated and there is no guarantee that even the line which might eventually exist would be actually up and running before building commences or that any of the authorities that would have to approve and finance such a link are likely to do so.

(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. The current proposals do not provide that.

- 7.2 The paper talks about providing access points from the A6 to the proposed sites north and south but gives no indication what this might entail or how it links with the additional traffic complications of the A6MARR. What we can be clear about is that the proposed development would put around 750 extra cars¹ on the road, adding to congestion that already backs up for several miles into Cheshire East and beyond at peak morning times. Also, the revised proposal for two settlements on either side of the A6 suggests the need for a roundabout or more traffic lights causing holdups, or an exit onto Windlehurst Road which would be at least as disruptive. 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.
- 7.3 A number of residents have referred to the fact that currently there is no TfGM bus service route through High Lane along the length of the A6 and serving Stockport. In the past two years we have seen the High Peak bus service route shortened and the TfGM bus which used to provide a two day a week service to Marple through the estates cut. With money tight, the clear trend is toward cutting services, not increasing them. There is no credible plan included in the GMSF Transport Strategy to improve or resolve the present shortfall in High Lane, let alone to support a new development of the scale proposed.
- 7.4 There is currently no easy or safe pedestrian-accessible rail station, no car access or frequent service from Middlewood in any case. There is a suggestion, again with no timing or substantive detail, of a 'new station'. This is problematic as placing it toward Hazel Grove would increase traffic through the village to reach it, and placing it at the Disley end would entail access through a residential estate and a complete new build. There is a consensus that the village needs improved rail access, but it is generally agreed that upgrading Middlewood station to provide car and better pedestrian access would be the more viable and economic answer. Placing some element of new development in this area would have the spinoff of both reducing car journeys from the new build and making a compensatory contribution for the village generally (*see Appendix 4*).
- 7.5 For several years at least, construction traffic, whether along the A6 or via Windlehurst Road or Andrew Lane would be significant and potentially long lasting. Two listed canal bridges would be affected or necessitate alternative routes limiting to the A6, with its own massive problems.
- 8. Air quality – see also Appendix 3**
- 8.1 There has been a growing demand for better monitoring and mitigation for the already unacceptable levels of pollution on and near the A6. 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, or is planned to happen. This presents a significant constraint for any proposed development in this area.

¹ See Appendix 2 footnote 15

- 8.2 The well-known concerns about health of residents and also the quality of life with traffic noise, heavy congestion and disruption have been visibly exacerbated by the opening of the new stretch of A555 causing more stationary and slow-moving queues through the village and significantly more 'rat running' evasion tactics through residential roads. There are encouraging signs that there is some movement to do more on these issues under the GMAQAP but given that we are already an area of pollution well beyond the recommended legal levels, there is a strong case to be made that adding to this with additional car journeys to/from new housing estates on the A6 and causing the tail backs to increase is unacceptable. It should be stressed that even with measures to alleviate air pollution (including electric fuel vehicles), the sheer volume of traffic, congestion and increased journey times already being experienced will remain an unacceptable factor affecting quality of life and economy.
- 8.3 There is no evidence that the accumulation of extra housebuilding and resultant Manchester, Airport and Motorway-bound traffic through the village from Disley, New Mills, Buxton, and as far away as Chesterfield has been quantified and taken into account. Much of this is the result of the increased attractiveness of Greater Manchester (which GMSF seeks to increase further) but its collateral impact on High Lane must be considered. Residents have seen this increase year on year. Taking this into account is essential in assessing developments that affect future increased traffic volumes in the village.
- 8.4 The recent increases in traffic congestion on the A6 and side roads is obvious and incontestable. It is equally obvious that 500 more dwellings would mean extra 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.
- 8.5 The Residents Association asked Darrell Williams, a High Lane resident and member of the HLRA Executive, to collate and review the evidence on Air Quality and to analyse the other matters relevant to the revised GMSF insofar as they impact on High Lane. His very thorough papers are appended at *our Appendices 2 and 3*. We would ask that these be read and seriously considered.

Summary

- Our main concerns are about a development which would be disproportionate to the existing village, destroy the viability of local Green Belt and still fail to meet the fundamental stated objectives of the spatial framework on sustainability, pollution and urban regeneration.
- In addition, any development would necessitate a massive investment in public transport – far more than the distant promise of a new train station on an already overcrowded service.
- Other infrastructure provision for health, education, retail, flood mitigation and possible geological complications related to mining would make it inevitable that developers would seek to negotiate down on the 'essential' infrastructure items to keep the project profits viable. Current planning law would make it hard to enforce 'infrastructure first' not least because many elements of this would not be in the hands of the developers or the powers of the council. Currently GMSF offers us no guarantees.

- Promises made in the proposals do not negate residents' fundamental objections and in addition are insubstantial and lack practical credibility.
- Any new development in High Lane needs to be proportionate, sustainable, in the right locations and supported by the necessary infrastructure being in place first.

**High Lane Residents Association,
March 2019**

Appendix 1 – Questions concerning High Lane and the GMSF stated site selection process

Appendix 2 – A summary analysis of the proposals with reference source and figures

Appendix 3 – A detailed review of sources on traffic and air quality with specific reference to High Lane.

Appendix 4 – A resident's letter suggesting an alternative site for some development with sustainability advantages.