

GMSF consultation response January 2019& TfGM Delivery Plan

Name of Respondent: _____

Policy GM Allocation 38 - High Lane (see Appendix A)

Question 120: Do you agree with the proposed policy GM Allocation 38: High Lane?

Agree / Mostly agree / Neither agree or disagree / Mostly disagree / Disagree:

We Mostly Disagree.

What is the reason for your answer?

There are several of the overarching policies that we agree with and would expect to see applied to any development in the High Lane Neighbourhood Planning area. These include: Brownfield preference; stronger protection for important green infrastructure; wider environmental policies. Specifically "We are also seeking to deliver a net gain in biodiversity assets over the plan period and to contribute to improving air quality primarily by locating development in locations which are most accessible to public transport".

However, we find this policy and other intents are inadequately applied to the proposed development in High lane and other GMSF areas.

A Air Pollution

The air quality in High Lane village centre around the A6 exceeded the legal limits in 2014 (confirmed by SEMMS-A6 to Manchester Airport Relief Road Monitoring and Evaluation Baseline Report). The opening of the A555 SEMS to Manchester Airport as anticipated has increased total traffic volumes. The addition of 500 homes, with at least 500 extra vehicles is not compatible with reducing current pollution levels to those required by law, and committed to by the ten district councils. We quote:

GMSF 1.24 "Government has directed Greater Manchester authorities to produce a Clean Air Plan to tackle Nitrogen Dioxide (NO2) concentrations and bring them within Limit Values in the shortest possible time. The ten districts have chosen to do this collectively and an Outline Business Case will be presented to GMCA and submitted to Greater Manchester authorities for approval in 2019".

The implication that air quality will improve radically by 2025 due to vehicle electrification does not adequately address the intervening years of pollution on ill health and potential deaths especially in the vulnerable young and elderly. The latter is of specific relevance to High lanes demographic.

It is also in conflict with Stockport's own 19 point Air Quality Plan.

Lastly, the two sites are located either side of the A6 to the west of the village centre. This means two additional junctions both north and south onto the A6, **as stated in requirement 5 of the allocation**. This will further reduce average speeds and standing times for vehicles through the village. This will directly increase air pollution further, not reduce it.

B Proportionality of Housing Development

The proposal for 500 homes to be built onto a village of just over 2,000 homes is still a disproportionate increase of 25%, considering the village's need for a sustainable future. It would adversely affect the village's rural character and sense of community. The concept that small dispersed developments are not practical is not supported by the many local small housing schemes of 5-20 homes that have been built in both High Lane and the surrounding area in recent years. Such small developments are not incompatible with a multi-phased approach over the 15 year

development period (2022 to 2038). Smaller developments also lend themselves to social and other affordable housing schemes. It does not prevent the council having a primary developer coordinating the management of land and phasing.

In response to GMSF we have conducted a survey on the development proposals which has had 216 responses, including 197 from local residents. The results are presented in Appendix B. **For residents who expressed a preference, a selection of opinions is as follows:**

- For the total number of homes (0-500), 32% wanted 0-100 and 44% wanted None
- 79% wanted all smaller (dispersed) developments.
- 86% wanted up to 50% of the affordable allowance (30% of total) to be social housing
- A percentage of the allocation of any development to be for local people.

C Green Belt/Site Selection

It is imperative that GMSF honours its commitment to 'Green Belt Last' in phasing of developments across all of its councils. This commitment was confirmed by The Mayor Andy Burnham at our meeting on the 5th March 2019. We therefore expect all of GMCA's Brownfield sites to be developed before any Green Belt land development is commenced, including the High Lane allocation. GMCA and SMBC must ensure that the 'Brownfield First' policy commitment is adhered to and land remediation and sustainability projects are incentivised. This could include the partial remediation to build and capping of higher risk areas across the same site, working with key stakeholders including the Environment Agency.

The development of two large plots to the west and south of the rural village will adversely affect two of the village's important and distinctive views. This visual amenity across the Green Belt both to and from the village is part of its essential value to the community. Smaller scale and dispersed developments would be less damaging to these distinctive views.

A more detailed review of the site selection justification for High Lane shows that the criterion used was Number 7 *"Land that would deliver significant local benefits by addressing a major local problem/issue". The justification for this in Allocation 38 under 11.234 is "The lack of provision for housing and care for the elderly in this area can be addressed by delivering housing focussed on that need alongside specific elderly care provision."*

There is a definite need for housing for the elderly, including those with care needs, but also for single storey dwellings such as bungalows, warden controlled/assisted living apartments etc. to enable local residents can downsize whilst staying within the community.

However, the numbers here are not in line with currently foreseeable levels of elderly need and lacks clarity on the justification. This statement suggests that the elderly people of High Lane need most of the 500 allocation for retirement and care. If this approach is implemented it would imbalance the community's demographic and put additional strains on the village's infrastructure.

D Lack of Transport Infrastructure

The village needs better public transport before any development begins so that people in new homes have the option to use it before they adopt the "car first" choice, through lack of alternatives. The most realistic and timely options are to increase buses to Stockport, preferably clean hybrids, and have an accessible train station with regular stops equivalent in frequency to Disley Station.

The proposal for a new station at High Lane (see Figure 11.9 Illustrative overview of proposals in Stockport) is a flawed policy option in many ways. It would require years of expensive works at huge disruption to the local community, including the local Brookside Primary school. It would have a high impact on air quality, noise pollution,

and present a health and safety risk to the school and the adjacent public park. It would also increase congestion and rat-running in the surrounding housing estate.

It would be more sustainable in design, build and time to re-develop Middlewood Station. The HLVNF GMSF survey showed an overwhelming 98% of the residents who responded and expressed a preference wanted Middlewood station used for better public transport (Appendix B). These include the following simpler, less costly and more sustainable options: upgrade metalled road access via Middlewood Road; improve the pedestrian and cycle access (via Middlewood Way upgrades, including sustainable LED/solar illumination) and a car parking option at end of Middlewood Road. There would be the added benefit of improving access to the social facilities of High Lane Cricket Club, creating a value-adding and improved village amenity, with a potential option to bring in a football pitch for the High Lane Village Team.

E Lack of Infrastructure

There is no detail in Allocation 38 on what local infrastructure improvements would be made to support the additional demands of the population increase from 500 homes. There would need to be additional provision of doctors, dentists, other health care providers, schools etc. These requirements should be reviewed and defined as binding commitments as part of the multiphase plan. The only related requirement from the 19 points is a vague commitment in Point 18 to "Make an appropriate contribution to new community facilities in the High Lane Area". Such previous commitments including SEMS provisions, have not had substance or been delivered and therefore cannot be relied upon. It needs to be more credible and defined than Statement 3 on master planning, which lacks certainty and clear milestones prior to housing being in place.

F GMSF Planning Number Assumptions

The GMSF planning numbers are based on the 2014 Housing Need numbers and not the revised lower numbers from the ONS 2016 statistics. We would contend that it is ethically, morally, financially and environmentally imprudent to over-plan in this way. There may be a government drive to use the unsound 2014 numbers, but a real and democratic consultation should be able to challenge or defer some impacts until further data is available from the ONS in 2020 and prior to any development starting.

This would also reduce associated planning costs and the stress on impacted communities.

G Allocation 38 Development Requirements

The requirements in the Allocation numbered 1 to 19 have good policy intents on transport, sustainability, housing design and protection of the "remaining green belt".

We would support many of these policy intents including: electric vehicle charging; ensuring boundaries reflect local design and additional cycle and footpath connections. The HLVNF Plan will include many such policies as integral to any future development, providing they are delivered upon and the homes are in the right proportion, of the right type and in the right place.

However, all these requirements will be empty gestures if disproportionate development of the community's Green Belt land is allowed, destroying it for current and future generations.

Signed: _____

Contact e-mail: _____

Address: _____

Appendix A Extract from GMSF Policy GM Allocation 38 - High Lane

Development of the site will be required to:

- 1. Deliver around 500 homes on the site;*
- 2. Make provision of a minimum of 30% affordable housing on site and across a range of housing types, including provision for older persons' affordable accommodation and custom/self-build;*
- 3. Be preceded by a comprehensive master planning exercise approved by the Local Planning Authority, which establishes a clear phasing strategy as part of an integrated approach to infrastructure delivery that supports the scale of the whole development, for example: surface water drainage, grey infrastructure including utilities provision, green infrastructure, superfast broadband and electric vehicle charging points;*
- 4. Ensure a high quality of design, creating visually attractive development, which establishes a strong sense of place by means of architecture, layout, landscaping and materials;*
- 5. Provide access points from the A6 to the areas north and south of that road;*
- 6. Make necessary improvements to highway infrastructure to mitigate the impact of the development, facilitate appropriate access to the site and incorporate enhancements to pedestrian and cycle routes in the area and to public transport, including contributions to high quality bus waiting facilities on the A6 and to possible development of a new railway station at High Lane, to be agreed with Network Rail and other appropriate bodies;*
- 7. Include measures to promote sustainable travel including production of a Travel Plan and appointment of a Travel Coordinator to develop, implement and monitor the Travel Plan. Travel Plans could include measures such as public transport vouchers and access to car clubs;*
- 8. Provide appropriate access to electric vehicle charging infrastructure and cycle storage;*
- 9. Make provision for suitable and publicly accessible open space and green infrastructure within the site;*
- 10. Make provision for new cycle and footpaths to connect with the existing local network, including routes to/from the Middlewood Way, ensuring that existing routes within and across the site are retained;*
- 11. Make provision for a range of suitable and publicly accessible open space and green infrastructure within the site;*
- 12. Development must be designed to minimise any adverse impacts on the remaining Green Belt, including the use of landscaping and carefully designed buffer zones that will manage the transition, and create strong defensible boundaries between the edge of strategic allocations and the new Green Belt boundary;*
- 13. Ensure boundary treatments reflect the local characteristics and include the planting of a new generation of mature native hedgerows and trees;*
- 14. Contribute to the area's special landscape qualities and key sensitivities in line with Policy GM-G 1 'Valuing Important Landscapes'. Development should restore positive landscape characteristics and features that reinforce the scenic quality and distinctiveness, having specific regard to the Stockport LCA and Landscape Sensitivity study, GM and National Character Area Opportunity statement;*
- 15. Protect and enhance biodiversity interests, through securing measures to improve linkages and habitat value landscape and natural features (e.g. trees, hedgerow, watercourses, water bodies, pollination species and priority habitats) in order to achieve biodiversity net gains in line with Policy GM-G 10 'A Net Enhancement of Biodiversity and Geodiversity';*
- 16. Promote and protect important views into Cheshire East including Lyme Park;*

- 17. Contribute towards the provision of additional school places and health provision generated by the development;*
- 18. Make an appropriate contribution towards the provision of new community facilities in the High Lane area; and*
- 19. Ensure provision of suitable and appropriate drainage measures, to be delivered through sustainable drainage systems. Surface water should be managed as close to its source as possible and on the surface where practicable to do so. Measures such as rainwater recycling, green roofs, water butts and permeable surfaces will be encouraged mitigating the impact of potential flood risk both within and beyond the site boundaries, whilst ensuring potential is minimised for urban diffuse pollution to affect the surrounding watercourses and water bodies.*

11.231 The site is close to the existing centre of High Lane and lies adjacent to that settlement, providing good access to local services.

11.232 The site provides a number of defensible boundaries to protect from further encroachment into the Green Belt.

11.233 The site is within the Ladybrook Valley and Hazel Grove High Lane Landscape Character Areas.

11.234 The lack of provision of housing and care for the elderly in this area can be addressed by delivering housing focussed on that need, alongside the delivery of specific elderly care provision. This can be delivered alongside other market and affordable housing to enable a sustainable mixed-use community to develop.

11.235 The provision of affordable housing in this area is vital to help address the significant shortfall of affordable housing provision that exists within Stockport, particularly in this area.

Appendix B HLVNF GMSF January 2019 survey data

Residents who expressed a preference				
		High Lane Residents 197 91%		
Total Respondents	216			
No of Homes as a range from 0 to 500				
Options	total			
0 - 100	68	31%	64	32%
101 - 200	13	6%	11	6%
201 - 300	9	4%	8	4%
301 - 400	4	2%	4	2%
401-500	23	11%	21	11%
None	98	45%	87	44%
Scale & placement of development				
Options	total			
All Smaller	123	57%	110	79%
1 Large & Smaller	20	9%	19	14%
2 Large	12	6%	10	7%
Expressed Preference	155		139	
Social Housing as % of the 30% affordable homes				
Options	total			
0%	5	2%	5	4%
Up to 10%	41	19%	39	32%
11 to 25%	25	12%	24	20%
26 to 50%	44	20%	37	30%
51 to 75%	4	2%	3	2%
76% to 100%	17	8%	14	11%
Expressed Preference			122	
% of total housing for Local people (Stockport/High Lane)				
Options	total			
0	2	1%	2	1%
Up to 10%	13	6%	13	10%
11 to 25%	27	13%	25	19%
26 to 50%	55	25%	48	36%
51 to 75%	9	4%	8	6%
76% to 100%	43	20%	38	28%
Expressed Preference			134	
Which railway station option is preferred				
Options	total			
Middlewood	117	54%	102	98%
New	2	1%	2	2%
			104	
Should the infrastructure be in place before development starts (phasing)				
Options	total			
Yes	160	74%	143	97%
No	5	2%	5	3%
Expressed Preference			148	

