

Heald Green and Long Lane Ratepayers' Association

Founded 1927



RESPONSE TO THE DRAFT GMSF CONSULTATION OF JANUARY 2019

This response is submitted on behalf of the Heald Green & Long Lane Ratepayers' Association to the GMSF Consultation of January 2019. The Association was founded in 1927 and, since Heald Green first became a local government ward in 1929, it has provided all local authority councillors, initially on the Cheadle & Gatley Urban District Council and, after local government reorganisation, on the Stockport Metropolitan Borough Council, almost always with one of the greatest majorities in Greater Manchester.

The Consultation Process

1. The consultation documents and supporting documentation comprise a huge amount of material which must be reviewed and digested to enable the citizen to understand and comment on the proposals. The deadline by which submissions to the consultation are to be completed is far too tight. Whilst the timetable may be legal, it is far from reasonable.
2. Following on from this, the consultation document and the mass of supporting documents are of such length and written in such language that they are almost impenetrable to the layman. The available maps, both on-line and at the Drop-In Sessions, were very poor and it was almost impossible to see what lay beneath the colour washed areas. This again means that the consultation process cannot be considered a meaningful engagement with the general public of Greater Manchester.
3. Within Stockport, the main attempt to include the public was by a few "Drop-In" events. Publicity for these events and the consultation in general, was poor and mainly carried out by local organisations. The displays were poor and the maps of the individual allocation areas were small and of almost indecipherably low quality. At one event there was only one small map of the area available and when someone took this away, there was no map available. There were no handouts, so members of the public could not take any written information away.
4. Heald Green Ratepayers have been fortunate to have a team of volunteers to undertake review work. It is submitted that it would be virtually impossible for an individual citizen with normal responsibilities to undertake this volume of work within the time permitted.

Heald Green in General (This comprises Allocation 37 and the misnamed Allocation 40)

5. The Heald Green Ratepayers' Association welcomes the reduction in proposed housing numbers for Heald Green, compared with the numbers proposed in the first consultation.

However, we consider that the current proposals still demonstrate a disproportionate number with attendant destructive effects on the ward. The GMCA choice of Heald Green sites demonstrates a possible failure to look at smaller Stockport sites which could provide housing without losing Green Belt. Actual sites selected will impose 'estates' of houses on Heald Green and pave over the last bit of open space before Handforth which will now see, per Cheshire East expansion plans, an additional 3,100 houses.

6. Heald Green is currently an exemplar of a "Community". The consultation states: "The direction of the Greater Manchester Strategy to form 'neighbourhoods of choice' feeds into Policy GM-E1 on Sustainable Places which requires new developments to contribute to successful places with a clear identity rather than functioning in isolation, to help Greater Manchester become one of the most liveable city-regions in the world." If the current proposals were to go through, Heald Green would be turned into an oversized, town-crammed, car reliant dormitory.

7. The draft GMSF falls short of, or contravenes, the requirements of the National Planning Policy Framework (NPPF) in a number of respects.

8. Paragraph 133 of the NPPF states that the Government attaches great importance to Green Belts and that the fundamental aim of Green Belt is to prevent urban sprawl by keeping the land permanently open. The essential characteristics of Green Belts are their openness and permanence.

9. NPPF para 134 states:

"Green Belt serves five purposes:

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

10. Clearly, Allocations 37 and 40 serve purposes a), b), c), and e) of these purposes.

11. Para 136 of the NPPF states: "Once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified,"

12. The NPPF requires "exceptional circumstances" before land can be removed from the Green Belt. Para 137 details three requirements which need to be met before land can be removed from the Green Belt. It is our contention that the three requirements have not been fully met.

13. The January 2019 GMSF document plans to release areas from Green Belt. The document makes no case for exceptional circumstances which outweigh the aims of Green Belt and thus not only ignores the requirements of NPPF but also flouts case law direction in this respect. Case law has established that alterations to Green Belt require exceptional circumstances and that the mere process of preparing a new local plan is not in itself an exceptional circumstance.

14. Paragraph 151 of the NPPF states that Local Plans must be prepared with the objective of contributing to the achievement of sustainable development. NPPF Para 7 states that "the objective of sustainable development can be summarised as meeting the needs of the present without compromising the ability of future generations to meet their own needs". (Resolution 42/187 of the United Nations General Assembly) The release of Green Belt which has an essential characteristic of permanence (i.e. for the benefit of all future generations) is in direct contravention of this requirement.

15. Clearly, the proposal to remove Green Belt is in contravention of the NPPF and is unacceptable.

16. However, the actual situation is much worse in Heald Green, as a large proportion of the Green Belt which would remain is already built-up, as follows:

17. Areas of Green Belt land which would remain but which are already built-up:

1. Land to the West of Styal Rd and South of Lomond Rd already occupied by housing
2. Land appropriated by construction of A6MARR in South-West
3. Land occupied by Robinson's buildings and commercial glasshouses
4. Land occupied by Seashell Trust
5. Land occupied by Griffin Lodge, Outwood House development and Hunter's commercial operation.
6. Land to the South of Stanley Rd, already occupied by housing and the A6MARR
7. Land occupied by Bolshaw School
8. Narrow buffer strip to West of A34

18. Areas of Green Belt land which would remain and are not already built-up:

1. Isolated single field West of Styal Rd and North of Lomond Rd
2. Isolated single field North of Daisy Bank Farm
3. Land South of Outwood Farm
4. Land South of Bolshaw Rd
5. Single field at the end of Dawson Rd

19. The areas of Green Belt land which would remain and are not already built-up consist of isolated small patches. If one considers the five purposes of Green Belt, then it is arguable whether they would qualify as Green Belt. In essence the proposals in the consultation document effectively denigrate the Green Belt in Heald Green to a useless token.

20. The value of the Green belt in the two allocation areas in Heald Green was recorded in the 2016 consultation document in the table overleaf.

Table 4.23: Assessment ratings for Strategic Green Belt Areas in Stockport					Strategic Green Belt Area assessment ratings
Strategic Green Belt Area	Purpose 1 To check the unrestricted sprawl of large built-up areas	Purpose 2 To prevent neighbouring towns merging into one another	Purpose 3 To assist in safeguarding the countryside from encroachment	Purpose 4 To preserve the setting and special character of historic towns	Score
20 (Woodford)					N/A
21 (High Lane)	Weak	Moderate	Strong	Moderate	12
22 (Off A34)	Moderate-Strong	Strong	Moderate	Weak-Moderate	14
23 (Nixons)	Strong	Strong	Weak-Moderate	Weak-Moderate	14
26 (Mottram)	Weak	Strong	Weak	Weak-Moderate	N/A

Notes: GMSF2016, Allocation 23 relates to GMSF2019 Allocation 37

GMSF2016, Allocation 22 relates to GMSF2019 Allocation 40

Scores are allocated from 1 (Weak) to 5 (Strong). A higher total score means a higher strategic rating.

21. From the table, it can be seen that GMCA's assessment of the two existing Green Belt areas in Heald Green accords them substantial importance. It is noted that while High Lane Green Belt attracts a score of 12 in the above table, as against Heald Green's score of 14, the High Lane Green Belt allocation has been reduced by 87% as opposed to Heald Green's reduction of 64%.

22. In addition to the enfeeblement of Heald Green's Green Belt to a mere token, it is also proposed to drive an access road, complete with bus route, through the major recreation field which is Local Open Space.

23. In order to reduce the nett loss of Green Belt, the GMSF2019 proposes to redesignate Bruntwood Park from Strategic Open Space to Green Belt. This Strategic Open Space is one of the two major parks within the borough. Bearing in mind the current proposals to redesignate substantial parts of Green Belt for development, it is difficult to see how redesignation of Bruntwood Park as Green Belt would give it any further measurable protection against development.

24. Furthermore, apart from a small area adjacent to Etchells Rd, the proposed redesignation would not fulfil the Green Belt purpose of preventing adjacent urban areas from merging neither would it fulfil any of the other four purposes of Green Belt. This proposed redesignation as Green Belt is a thinly veiled manoeuvre to reduce the nett loss of Green Belt. It is not in accord with the GMSF policy, which states "Land has been added to the Green Belt where its designation is necessary to keep it permanently open, where enhancements to beneficial use can be made and where development would be harmful to the sustainable delivery of the spatial strategy."

25. Paragraph 178 of the NPPF requires public bodies to cooperate on planning issues that cross administrative boundaries. Although the GMCA is a prime example of cooperation by authorities within the Greater Manchester boundary, it takes no account of the plans of Cheshire East Council with particular reference to the Cheshire East Local Plan Strategy and emerging Strategic Allocation Development Plan Document, which will have a hugely significant effect on the transport infrastructure within South-West Stockport,

before any GMSF proposals are added.

26. The Cheshire East Local Plan Strategy has been approved. It includes the establishment of the “North Cheshire Growth (Garden) Village”. The Development Plan Document (DPD) for this includes for 1,500 dwellings, plus the facility for self-build and community build, plus 12 ha of employment land. The site is in the Green Belt, adjacent to the Stockport boundary and access is solely from the A34. In addition the DPD includes for 250 houses between Clay Lane and Sagars Rd, in the Green Belt, again adjacent to the Stockport Green Belt in Heald Green. Also in addition, Seashell Trust have applied for planning permission in the Heald Green Green Belt for the construction of 325 houses. This application was refused by Stockport Council and is due to be considered at a Public Inquiry due to start on 8 May. The above totals an additional 2,075 houses plus self-build plus community build in the Green Belt between Stockport and Handforth, prior to GMSF being finalised. It should be noted that the transport issues created by the North Cheshire Growth Village alone, were put forward by Stockport Council as reasons why they could not support the Cheshire East Local Plan proposals in this area.

27. The draft GMSF shows allocations and the way these allocations measure up to the various criteria is provided in the draft and in the supporting documentation. There is no comparative analysis between the selected allocations and other sites which were not selected. It is therefore impossible for anyone reviewing the proposals to ascertain whether the most appropriate allocations were selected from a range of alternatives. As it stands, the draft GMSF reads like a shopping list of sites each of which is judged against criteria, only after it was decided to include it within the allocations. This lack of any rigorous comparative analysis demonstrates a flawed methodology and is not in keeping with the aim of sustainability.

28. It is submitted that the draft GMSF is underpinned by economic forecasts of dubious utility. It focusses on an economic view of Greater Manchester which is speculative and, in fostering increasing focus on the Manchester part of Greater Manchester, is divisive. There is a baseline economic forecast and an accelerated growth economic forecast but no forecasts for neutral or negative growth. Given the recent economic problems faced by the UK and the looming unknown of Brexit, this speculative over-optimistic basis lacks rigour. In fact the Employment Topic Paper says of Research carried out by academics as part of the ESRC project on ‘The Economic Impacts of Brexit on the UK, its Regions: "This assessment found that a third of Greater Manchester’s manufacturing output is exposed to Brexit." The economic reports of New Economy essentially do little more than re-spin the analysis of the Manchester Independent Economic Review carried out in 2012.

29. The effect of the so called Northern Powerhouse initiative is assumed to be wholly beneficial, despite the huge public and political opposition to some of the central policies of this scheme. It is submitted that the economic thought which underpins many of the assumptions on which GMSF2019 is predicated is unreliable and far from universally accepted.

30. The latest ONS projections for GM for household growth forecast a 24% reduction compared with the figure predicted in July 2014. Whilst the Combined Authority is resolutely sticking to the 2014 figure, it must be pointed out that mixed messages from government and the uncertain political situation may well change this decision before the Spatial Framework is concluded.

31. The revised Draft GM2019 Growth Options document is predicated on an uplift of 25% on historical rates of industrial, warehousing and office development. The only stated justification for this uplift is a theory that if more commercial and industrial accommodation is planned then the extra accommodation will be filled, bringing with it extra jobs. The large amounts of empty accommodation in GM would seem not to support this theory, which also seems contrary to the driver of market forces.

32. The GMSF documentation states that the need for industry and warehousing land in Greater Manchester is 4,220,000 sqm and the baseline supply is 2,627,492 sqm, leaving a shortfall of 1,592,508 sqm. The need for office space is 2,460,000 sqm and the existing baseline supply is 2,806,705 sqm. If the 25% uplift is discounted, the total requirement for the commercial use is 5,344,000 sqm. The total supply is 5,433,000 sqm. Hence supply exceeds demand by 89,000 sqm. It is the arbitrary use of the 25% uplift which causes the predicted demand to exceed supply.

33. It is submitted that rather than seeking to release Green Belt across Greater Manchester, some of these proposed industrial and warehousing sites, which are in excess of the estimated need, should be recategorised for residential use. This would also be in keeping with the sustainable aim of enabling more people to live closer to places of employment.

34. The supporting document 'The Natural Environment – Priority Green and Blue Infrastructure' recognises at paragraph 4.3 that The Greater Manchester Ecological Framework is based on “relatively poor and incomplete species datasets available at the time and therefore is not considered to be particularly robust”. At paragraph 4.4 it recognises that the 'GM Priority Ecosystem Service Pinchpoints Study' has produced a “heat” map which, although valuable, “is somewhat difficult to interpret from a land use planning point of view”. It is submitted that these are just two examples of this essential part of the GMSF2019 consultation being based on poor and inadequate preparatory research.

35. Sustainable development is an essential requirement of the NPPF and the GMSF. The supporting document “Greater Manchester Spatial Energy Plan” recommends that district heating schemes can contribute to low carbon energy planning. This document identifies a number of town centres within Greater Manchester which have the potential to deliver district heating schemes, yet the draft GMSF envisages no such development in the town centre areas. Further Combined Authority documentation notes that development patterns influence travel behaviour and transport infrastructure and that housing needs to be in the right place and this means compact and mixed-use development around town centres. It is a simple truth that people who live in town centres, close to jobs and facilities, do not need to use motor vehicles – private or public – as much as those who live in commuter belts. It should also be noted that free flowing traffic produces less air pollution than standing traffic. Any proposal which increases congestion on our roads cannot be considered sustainable. The problem of transport is something which the GMSF proposals regard as something to be attended to after the allocations are agreed. This approach is flawed and is the very antithesis of a sustainable development proposal. It is submitted that the draft GMSF fails to consider in any way this basic building block of sustainable development.

36. Whilst the consultation document is weak on the costs and financing of infrastructure, the suggestion is that large scale developments will provide the finance. The draft GMSF

also recognises the need for affordable housing. However, the provision of affordable housing by the private sector will lead to a reduction of the associated finance available for infrastructure. The whole vital subject of infrastructure, including transport and the financing thereof, receives no rigorous consideration in the GMSF documents and undermines the whole consultation.

37. It is submitted that the draft GMSF is concerned with creating an ever-increasing commuter belt to serve Manchester centre and the airport, at the expense of real local, sustainable development to benefit the towns within Greater Manchester. This approach is in contravention of the NPPF principles.

38. It is submitted that Heald Green is under threat of merging with two different areas:

39. Firstly, Manchester Airport. Manchester Airport has, de facto, become a town in itself. In fact, the Airport's latest £1B Transformation Project has been given the name "Airport City". Tens of thousands of square metres of office space are in the pipeline and yet more hotels have just received planning permission. The airport's latest 9,600 space surface car park now reaches almost to the Heald Green boundary and private operators are attempting to gain permission for further parking facilities even closer. The unofficial and often illegal parking of airport workers and holidaymakers in Heald Green is an increasing problem.

40. The proliferation of airport parking which blights the surrounding communities and countryside is a testament to the huge numbers of motor journeys that the airport generates. To read the Consultation document one would imagine that the airport, sitting at the centre of what is termed a public transport hub, is somehow a model of sustainability. This is fantasy and is not a widely shared view. It is submitted that Heald Green (along with other communities) needs protection from uncontrolled airport expansion. Instead the Consultation document seeks to sacrifice the community of Heald Green in order to house staff at both the Airport and Airport City.

41. This proposal suggests that the dwellings are within easy walking distance of Manchester Airport. It is submitted that there are already many dwellings at a similar distance from Manchester Airport, particularly in Wythenshawe, but the number of people who actually walk or cycle to the airport is currently 0.2%. The reason for this is that it is simply not practical, nor indeed safe, to walk to the workplaces at the airport or the Airport City Business Park. We therefore think that the suggestion of walking to the Airport from Heald Green, particularly Allocation site 40, is unrealistic and not worthy of inclusion.

42. Secondly, Cheshire East. The spread of Handforth driven by Cheshire East Council's aggressive and opportunistic release of their own Green Belt on the border of Stockport at Heald Green.

43. It is stated that developers of the two Heald Green sites will be required to contribute towards additional health provision needs generated by the development. However, GMCA have no authority to enlarge healthcare provision.

44. Primary care services are already over-stretched in Heald Green. District nurses, treatment rooms and health visitors, as well as palliative care and mental health teams are already unable to provide the standard of care they would like. One of the Group

Practices is one doctor short and struggling to recruit. Consequently, they would be unable to take a significant increase in patients safely. They would sink under a growth in the patient population as they are unable to recruit GP's.

45. If the proposed population increase took place, a new group practice would be required but it would not be possible to source the doctors, nurses and other medical staff to run it. In fact, currently within Stockport, group practices are closing as they cannot recruit new staff.

46. Staff recruitment and retention is a real problem. GMSF2019 is totally lacking in appreciation of the impact of a significant increase in population on health and social services, which are already significantly over-stretched.

47. In addition, the loss of Green Belt around Heald Green would have a deleterious effect on the health of the population. Many patients walk around the local parks and Green Belt which helps to combat depression and improves their wellbeing.

48. The plan is guilty of putting the cart before the horse. A decision on whether a secondary school is required and if so, whether it should be on or off site, must be made before Heald Green is selected as being suitable for 1,700 homes. In addition, the primary schools will have to be extended before the homes are occupied.

49. It is also noted that the Consultation document uses the phrasing: "Development of this site will be required contribute towards..." and "make an appropriate contribution towards...", not "Developer of this site will pay for..."

50. It is abundantly clear that no one can deliver on the infrastructure assumptions within the Consultation document, especially not a developer with an eye on margins.

51. The idea that improved public transport links will somehow mean that construction of an additional 1,700 homes in Heald Green will not result in increased traffic congestion and pollution is fanciful in the extreme. Short of banning new residents from bringing their motor vehicles with them, these developments can only significantly increase congestion in an already badly congested area of Stockport. Already the air pollution on the A34 South from the A560 up to Sainsbury's roundabout is one of the highest levels in the country and above legally permitted levels. It will be made worse by generating even more cars from Cheshire East and would be made worse again by any new Heald Green housing.

52. Assumptions about the capacity of Heald Green Rail Station do not accord with the reality of the station's current use, let alone an increase in that use. The proposal completely fails to understand the car parking issues at present. Many of the assumptions about the suitability of this site for development are not in accordance with the current situation. Without major refurbishment of Heald Green Station and huge enlargement of parking facilities, rail use by an enlarged population would be less than successful and once again bring misery to local people. Even now, rail commuters park their cars on residential streets up to half a mile away. Improvements are necessary now, let alone for a new large influx of commuters. The introduction of a new rail station at Stanley Green would help with public transport infrastructure for the new GMSF Allocation 40 population. However, it would have been more beneficial if some of the GMSF2016 area of housing in Cheadle Hulme on the eastern side of the railway, had been left in the new proposals. This

would have meant that access to the new station would have been from 360 degrees and included many more people. It would also have reduced the number of houses needed in Heald Green's allocation.

53. In the local area there are 4 major attractions which bring significant traffic into Heald Green from outside the district, some from outside Stockport and Greater Manchester. These are Manchester Airport (to which is being added Airport City), Cheadle Royal Retail Park (John Lewis/Sainsburys), Handforth Dean (Tesco, M&S, Boots, Next and soon to be many more) and Cheadle Royal Business Park. Cheadle Royal Business Park is founded on the concept of it being a high tech or regional/national headquarters location and is a low density, extensively landscaped development for this purpose. Unfortunately, the exit from the Business Park is blocked by standing traffic for several hours of each working day. Any increase in A34 traffic will further reduce the attractiveness of this business park which is contrary to the very basis of the Combined Authority's intentions. It is submitted that local public transport schemes, cannot alleviate regionally generated traffic flows.

54. The Greater Manchester Clean Air Plan, a document which underpins GMSF, is silent on the impact of Manchester Airport on air quality. This is a staggering omission, even more so when one of the sites selected is right on Manchester Airport's doorstep.

55. Whilst the likelihood of an air disaster close to the airport is very low, it is sufficiently important that the Airport and emergency services have regularly practised rehearsals for such an event. It is clear that any increase in traffic flows and/or standing traffic in the local area will hamper the ability of emergency services to attend to any incident in, or via Heald Green. Even "Blues and Twos" cannot travel through standing traffic.

56. It is submitted that in selecting the two sites in Heald Green the proposals fail to take account of current local conditions, local trends and the future effects of those trends. The sheer scale of the proposed housing developments across the southern border of Stockport (with Heald Green being the worst affected ward) is unacceptable.

57. At no point does the Consultation Document consider the transport requirements of people with mobility impairments, which require them to use their cars as they are unable to either get to and/or use public transport, let alone walk or cycle. This group have a protected characteristic under the Equality Act 2010 and therefore the Public Sector Equality Duty applies. An Equality Impact Assessment is required to establish the impact on the day to day lives of people in this group, such as increased traffic from new large-scale developments.

Allocation 37

58. The original GMSF1 allocation in this area was comprised of two parts. One was the area of Nixon's farm and the other was Robinson's major horticultural premises. Access to the site through Robinson's land was envisaged. As Robinson's site is no longer available, Allocation 37 is effectively landlocked. The Consultation document proposes access points from Outwood Rd. The only access points from Outwood Rd which do not require demolition of established sound housing are through Public Open Space. This has been Public Open Space since 1936, as evidenced in the Sale document and integral covenant. Any attempt to lift this covenant will be strongly resisted by the local community. In

addition, the successors in title to the covenantor have been approached and will throw their weight behind the local community to resist any diminution of the POS. The recreation ground is heavily used for general walking and casual sport and contains three regularly used football pitches. It is also the location of the Annual Heald Green Festival, which uses the whole of the field and is attended by several thousand people. In addition, it is home to the Heald Green Village Hall which is at the heart of the community in Heald Green. The Hall is heavily used for all manner of societies and pastimes, being almost completely booked up. The Village Hall Management Committee and the Heald Green community are very happy with the present facility and do not wish for there to be any disturbance.

59. It is noted that Allocation 37 also includes the land currently used by Cheadle & Gatley Football Club (CGFC) and Bolshaw Primary School. The CGFC land is in the Green Belt, is publicly accessed land and, again, this is subject to a covenant to this effect. CGFC operate two pitches on this land and have a modern Club House with changing rooms. CGFC currently have 450 young people training and playing football, based on this site.

60. The two areas of publicly accessed open space with football pitches amount to approximately 8 ha. This amount of open space and five football pitches is unlikely to be provided in the proposed housing estate particularly football pitches and changing rooms, as it will make too big an inroad into the building area. First comes a proposal to build on the existing publicly accessible open space which is very well used and then comes a generous offer to return a "suitable" amount back the community within the development. The definition of suitable is not specified. The current site is regularly used to keep people active and healthy and also includes the school playing field.

61. It is noted that for the provision of health, education and other needs generated by the development, the proposal only requires the development to "Contribute towards..." not actually pay for.

62. Is it envisaged that Allocation 37 would be a sufficiently large traffic generator that it would need its own bus lane to facilitate getting onto surrounding roads.

63. Allocation 37 would go a long way to merging Heald Green with Manchester City and Manchester Airport.

64. This proposal would also remove the last buffer that exists between Heald Green and the wider commercial/industrial zone of Manchester Airport.

Allocation 40

65. It is worth questioning why Allocation 40 has been described as Stanley Green, when it is clearly part of Heald Green. In fact, the Plan's own notes acknowledge it as being within the Heald Green Fringe Landscape Character Area (para 11.248). That area of Heald Green has never been referred to as Stanley Green by anyone from Heald Green. It is a misleading misnomer and has annoyed many people locally who see it as "hiding the facts" from the local population. Locally, this is seen as an attempt to disguise the fact that Heald Green is being proposed to take a total of 1,700 dwellings which is 46% of Stockport's allocation within the Green Belt, which is clearly viewed as unfair.

66. The site proposal includes provision of:

- (a) "a minimum of 30% affordable housing, including "provision for older person's affordable accommodation"
- (b) "an appropriate contribution towards the provision of new community facilities in the area".
- (c) "a local centre, providing retail and other services"

67. With respect to (a), it must be realised that the resultant minimum of 255 low cost homes will attract those with lower nett disposable income. Whilst this may reduce potential car ownership, the almost total lack of public transport will cause isolation and hardship. There is mention within the document of a Rapid Transit Bus service. Whilst this may, at this stage, be an admirable intention, the continuation of such a service in perpetuity is most dubious, considering the impossibility of guaranteed perpetual funding, witness the 300 service in Stockport Town centre. With respect to (b) and (c), an estate of 850 houses is too small to make these laudable intentions sustainable. With respect to (c), the country is littered with small rows of shops which are decaying, particularly as, in this case, there will be no passing trade.

68. The consultation document states "The direction of the Greater Manchester Strategy to form 'neighbourhoods of choice' feeds into Policy GM-E1 on Sustainable Places which requires new developments to contribute to successful places with a clear identity rather than functioning in isolation, to help Greater Manchester become one of the most liveable city-regions in the world."

69. It is suggested that the construction of 850 homes, including 255 low cost/elderly peoples' accommodation on this isolated site will produce a dormitory estate which will be "*functioning in isolation*".

70. It is noted that for the provision of additional school places and health provision the document only mentions "contribute towards" and for community facilities, "make an appropriate contribution towards...", which phraseology renders the promise meaningless. In the case of the intention to "Deliver a local centre providing retail and other services", no developer contribution whatsoever is mentioned.

71. Allocation 40 envisages access onto the A34 from the site. The traffic congestion problems of the A34 are already well documented. It is submitted that dumping traffic from another 850 dwellings on to the A34 would be impractical, unsustainable and irresponsible. It must be borne in mind that the greatest flow of commuter traffic in the whole of GM is to/from Cheshire East. A substantial proportion of this traffic uses the A34. Proposed residential and commercial development planned by Cheshire East Council (as detailed in para 26, above), immediately across the border in Handforth, will exacerbate the current problems, a fact explicitly acknowledged by Stockport Council themselves in their refusal to endorse the Cheshire East Local Plan Strategy.

72. The Consultation document includes "the planting of a new generation of mature hedgerows and trees". It is not clear how one can plant mature hedgerows and trees.

73. This proposal will remove land last used for agricultural purposes. It was used for

cattle grazing and hay cropping. However, in order to ease their application for housing in the Green belt (referred to in para 26, above), the Seashell Trust landowner has stopped the local farmer from using the land for agricultural purposes.

74. The document gives assurance that "views to the Peak District and countryside of Cheshire East are preserved." There will be very little Cheshire countryside to see because of Cheshire East Council's Local Plan Strategy for thousands of extra homes, just across the border. In addition, it must be remembered that the Cheshire plain is flat so cannot be viewed from Heald Green. For a plan that talks so much about sustainability within Greater Manchester there is a huge blind spot to what is going on right on the border of Greater Manchester.

75. The document also promises to "Make necessary improvements to local highway infrastructure to mitigate for the impact of the development, facilitate appropriate access to the site and incorporate enhancements to public transport, direct and high-quality pedestrian and cycle routes in the area."

76. It is implicit in this point that improvements to the local highway infrastructure would be necessary if this development were to proceed. This aspect of the infrastructure would need to be in place before any housing development is allowed and should be part of the plan before the it is approved.

77. Due to its geographical separation from the current Heald Green housing and centre, residents in this location would not enjoy the strong community identity and social cohesion that currently exists in Heald Green. These are exemplary features of this diverse community, fostered by the Ratepayers' Association.

Manchester Airport Operations

78. The assessment of suitability of Allocations 37 and 40 appears to have totally ignored the operational effects and requirements of Manchester Airport.

79. Allocation 37 lies only 400m to the side of the glideslope of Runway 23R, which is the landing runway for approximately 80% of the time. As such it is subject to substantial aircraft noise.

80. The latest noise figures, for Summer 2017, show that the northerly part of the site is within the following contours:

Average Night Noise = 57 dBL_{aeq,8hr}

Average Day Noise = 60 dBL_{aeq,16hr}

Average 24 hr Noise = 60 dBL_{aeq}

These levels already put part of the site within the area requiring noise insulation for dwellings.

81. It should be realised that following the practically universal introduction of high bypass jet engines, there is no further technological advance which will bring about a substantial reduction in the noise of individual aircraft in the foreseeable future. However, as the number of aircraft movements at Manchester Airport increases, the noise exposure will

increase, potentially putting some of the site within the area where planning permission for housing should be refused.

82. One of the main parameters used by airports to assess its noise effect is the area enclosed by the 60 dBL_{aeq,16hr} contour. Comparing 2017 with 2016, the number of flights increased by 5.9% but the area within the daytime contour increased by 8.8%. The current government consultation document "Aviation 2050 - The Future of UK Aviation" forecasts more than a doubling of global passengers by 2037. In the last three months of 2018, the increases in passengers at Manchester Airport were 5.8%, 7.0% & 6.7%. The airport is forecasting these increases, compound, for years to come. Clearly, the noise levels in Allocation 37 will increase accordingly.

83. The consultation document speaks of the airport "...growing to make best use of its existing runways and handle around 55 million passengers per annum." Government policy is to "make best use of existing runways". Currently the Airport operate their two runways in segregated mode. It may be that with advances in technology and in order to cater for the forecast increase in movements in the future, they may move to mixed mode operation. This will mean that Runway 23L/05R may have to be used in mixed mode. This will cause a substantial increase in noise levels in the area of Allocation 37.

84. Over the last few years, a number of authoritative surveys have concluded that public sensitivity to aircraft noise has increased, so that what may have been an acceptable level a few years ago is no longer acceptable. Whilst the reason for this is unknown, if it continues in this way, then the levels of noise in the area may become increasingly unacceptable.

85. In October 2018 the World Health Organisation produced its long awaited Environmental Noise Guidelines for protecting human health from exposure to environmental noise. Their conclusions on aircraft noise are as follows:

Recommendation	Strength
<i>For average noise exposure, the GDG strongly recommends reducing noise levels produced by aircraft below 45 dB L_{den.}, as aircraft noise above this level is associated with adverse health effects.</i>	Strong
<i>For night noise exposure, the GDG strongly recommends reducing noise levels produced by aircraft during night time below 40 dB L_{night.}, as night-time aircraft noise above this level is associated with adverse effects on sleep.</i>	Strong
<i>To reduce health effects, the GDG strongly recommends that policy-makers implement suitable measures to reduce noise exposure from aircraft in the population exposed to levels above the guideline values for average and night noise exposure. For specific interventions the GDG recommends implementing suitable changes in infrastructure.</i>	Strong

(GDG: Guideline Development Group)

86. It should be noted that the noise levels are external, hence noise insulation is not relevant.

87. Whilst L_{den} values have not been calculated for Manchester Airport, the perceived wisdom is that reducing the current noise levels to the WHO recommended levels would require a reduction in movements by about 50%. Clearly, this is not going to happen. However, it is also clear that the area recommended by the WHO Guidelines as being injurious to health will be substantially greater than the area previously acknowledged as such. In addition movements are confidently forecast to increase.

88. The final WHO recommendation regarding changes in infrastructure clearly points to the necessity of ensuring that infrastructure planned for the future, must be planned not to increase the numbers of the population living in areas subject to noise above the strongly recommended levels of the WHO. It, therefore, follows that housebuilding in Allocation 37 would be contrary to the strong recommendations of the WHO.

89. Consideration should also be given to the fact that the northern end of Site 37 is within 250 m of the Public Safety Zone of Runway 23R, within which there should be no developments which would increase the number of people living, working or congregating and that, over time, the number should be reduced as circumstances allow. No new or replacement dwellinghouses, mobile homes, caravan sites or other residential buildings should be permitted. (DfT Circular 01/2010) Whilst the Allocation 37 is just outside the Public Safety Zone, the extent of the Zone must be recalculated, periodically. It would appear foolhardy to contemplate building dwellings so close to the present Zone.

90. The implications of the effects of Manchester Airport on the proposal for Allocation 40 are less than those for Allocation 37. It is not currently within the area affected. However, changes to airspace in the region are under consideration and will be introduced within the next few years. Allocation 40 may then fall under one of the new flightpaths. Designating Allocation 40 for housing may add to complexity of the determination of the new flightpaths.

Conclusion

91. The principles of GMSF and of the Green Belt are completely overridden by the current proposals, which cause merging with nearby communities, reduce open space and thus reduce wellbeing and health benefits to the current and future populations. The consultation proposals do not take due regard of the conclusion of some of its own supporting documentation. The infrastructure for health has not been specified clearly and certainly not budgeted for because neither the Combined Authority nor the Council have control over such matters and therefore cannot guarantee the infrastructure needed. Much of that would be in the hands of developers and market forces.

92. Allocation 37 has two fundamental problems. Firstly, access through Public Open Space and secondly the proximity to the airport's flight paths, with the resultant problems of aircraft noise and public safety. Its possible development is, therefore, a non-starter.

93. Allocation 40 also has two fundamental problems. Firstly, access onto the already overloaded A34 which would be exacerbated by the Cheshire East's policies which will pour even more traffic onto the A34. Secondly from the air pollution into the site from the A34.

94. Neither of these sites, being of such density and mass, are in keeping with the present community of Heald Green. Together they would increase the number of households by one third. Being on such a vast scale, they would be difficult to integrate with the present community. Allocation 40 will not be sufficiently well served by public transport. Even if the much-vaunted rapid transport bus service can have its funding preserved in perpetuity, it would only provide transport to Woodford and the airport. Allocation 40 is of such a distance from the centre of Heald Green that it would become a car dependant, separate enclave. We should not be planning mere houses but communities. We should have learned the lessons from the brave new planning world of the 50's and 60's.