



WILLIAM WRAGG MP
Member of Parliament for Hazel Grove Constituency
13 Stockport Road, Marple, Stockport, SK6 6BD

Greater Manchester Integrated Support Team
PO Box 532
Town Hall
Manchester
M60 2LA

09 January 2017

Dear Sir / Madam,

Consultation on the draft Greater Manchester Spatial Framework

In response to the above consultation, please find enclosed with this letter my full detailed submission.

The strength of local opinion is clear to see, the voices from not only my own, but neighbouring constituencies, are clear: the greenbelt should be safeguarded, and previously developed urban land (brownfield sites) should instead be prioritised for housing. Greenbelt should not be used for housing development on the scale currently being proposed in the Draft Framework.

You will additionally be aware that since September 2016 I and neighbouring MPs have been collecting signatures on petitions declaring that the Greater Manchester Spatial Framework should avoid large-scale residential development on the greenbelt, which is a valuable barrier to urban sprawl and is hugely valued by local people; and further declares that brownfield land should be prioritised for residential development provided that proper infrastructure is in place. To date, in Hazel Grove constituency alone, in which the High Lane site is proposed, over 4,000 signatures have been collected.

Thank you for your due consideration.

Kind regards

William Wragg MP
Member of Parliament for Hazel Grove

**Submission to Greater Manchester Combined Authority Public Consultation
Draft Greater Manchester Spatial Framework
William Wragg MP, Member of Parliament for Hazel Grove
9th January 2017**

CONTEXT

I am responding to this consultation in my capacity as Member of Parliament for the Hazel Grove constituency.

The Greater Manchester Spatial Framework represents the Combined Authority's plans for the management of land for housing, commercial and industrial use over the next 20 years. It will have a permanent effect on not only the location, but the shape and character of local communities and will impact the lives of many thousands of families for generations to come.

I want to make clear from the outset that I am not against building and housing developments per se. Nor am I against the concept of the Framework itself – on the contrary, I think a cross-regional approach to sharing housing allocation from the Combined Authority strategically across Greater Manchester is to be welcomed. We of course need to provide new developments in order to fill the housing shortage, and provide jobs for now and generations to come; however this should be done in a way which is sensitive to both the local environment and the wishes of local communities. It should also be only where there is genuine need, and where the infrastructure exists to support such developments.

It is in that spirit which I wish to raise some specific concerns about the methodology behind the Framework and also the salient issue of protecting greenbelt land and promoting, as far as possible, developments on alternative brownfield site instead.

POPULATION FORECASTING - GMSF METHODOLOGY

The Draft Framework proposes that 227,200 net additional dwellings will be needed by 2035 in order to home a projected population increase of almost 300,000 people. It also apportions this house building target across the ten Greater Manchester councils, and in the case of Stockport the allotted target is 19,300 new homes.

I have concerns about how these figures have been derived. In order to estimate the population growth information from the Office of National Statistics, the Department for Communities and Local Government, an economic forecasting model, the Experian credit referencing agency, and independent business consultants, were considered.

In 2014 the Combined Authority produced a 165 page document, outlining and consulting on its methodology for calculating the future housing needs. This was subject to a separate consultation process, but the bottom line was a **prediction of 294,800 extra people living in Greater Manchester by 2035**, which translates into the 227,200 new homes – the figure used as the current basis of the draft GMSF.

Forecasting is a very difficult and complex task and is always subject to a degree of uncertainty. However, taking just the most recent three forecasts from the ONS, from 2008, 2010 and 2012, there is a variance of almost 200,000 people between the highest and lowest estimates for the population of Greater Manchester by 2032. This means that the Framework's critical number (294,800) overlaps two thirds within the margin of error of the three most recent ONS forecasts. It is also curious to observe that 10 large housing developers, including the likes of Barratt Homes, Redrow Homes, and the Peel Group, all claimed that the Authority's Objective Assessed Need figure was too low, whereas on the other hand the Campaign to Protect Rural England called it "excessively high".

Faced with such wild variance in the estimates of population growth, it is difficult to have faith in the Combined Authority's arithmetic and I for one wonder if the projected need goes beyond the true need. **I call on the Combined Authority to defend the robustness of this population growth forecasting, as it moves towards finalising the Greater Manchester Spatial Framework.**

RELEASE OF GREENBELT LAND

The second major area of concern I have over the Framework is its proposal to release of greenbelt land for housing development.

The draft Framework proposes that 4,900 hectares of Greater Manchester's Green Belt be built on, representing a net loss of over 8% of greenbelt land across the area. Under the Draft Framework, Stockport, the Borough I represent a portion of, is set to lose 9% of its greenbelt, and would see over 8,000 homes built on greenbelt in Cheadle constituency, whilst in neighbouring Hazel Grove constituency, permission would be given to build a further 4,000 homes on fields around the village of High Lane – essentially doubling the size of that village. These housing developments have been proposed with little regard for the burden of increased traffic on the road network, or the increased pressure on public services.

However, even if all these homes are realised, they only account for two thirds of Stockport's overall target in the Draft Framework and so I fear this is likely just the thin end of the wedge for the loss of greenbelt land.

WHY PROTECT GREEN BELT?

Green Belt the best loved and most easily understood British planning policy and is hugely valued by local people. It has been a longstanding commitment of all colours of Government that redevelopment and reuse of land in urban areas, so called brownfield sites, should take priority over green field sites. This is rightly so for many reasons:

Regeneration – Firstly, we need to get people living in town centres again. Our cities are thriving but medium and large towns are being neglected. This depopulation leads to further decline and creates a vicious cycle, as has been witnessed in Stockport - however Manchester, to its credit, has made great strides in this respect. The greenbelt encourages regeneration of our towns and makes best use of our land.

Transport – Secondly, greenbelt is a vital barrier to urban sprawl, and encourages us to build upwards not out; to live nearer to our work places and not to commute and congest. Our local roads, infrastructure, and transport capacity already struggle with existing demands. These proposals for massive developments in rural areas will only make matters worse.

Countryside - Thirdly it protects the countryside and all the benefit that brings

In contrast, developing vacant brownfield sites that have previously been used for commercial or industrial purposes, is more suitable for house building. They are closer to the urban centres, retain the countryside, boost regeneration, and ease transport pressure.

Yet before these many brownfield sites have been properly utilised, the Framework seeks to release greenbelt land, which once gone can never be gotten back. While building on greenfield sites is sometimes necessary, the release of greenbelt land now, and on the scale proposed, is a huge disincentive to proper use and regeneration of brownfield sites.

Most of our housing is now provided by volume housebuilders. They are essential to housing provision, but their business models favour large new green field developments. If we make sites in the greenbelt

available, the volume house builders will develop these first, and make the spurious case that sites in our towns are unsuitable or unprofitable. Once they have developed on the greenbelt releases, they will come back for more before they even look at urban land. Therefore the opportunity for real regeneration in Stockport, and other Greater Manchester towns, will be lost for a generation.

PRIORITISING BROWNFIELD SITES FOR DEVELOPMENT

There are several steps the Combined Authority should take to ensure that brownfield developments are prioritised, and to ensure this is reflected in the final version of the Framework. This will ensure our towns are regenerated first, and that greenbelt is only released when it really is the last option.

First, we need an accurate estimate of the amount of urban land actually available. According to the Combined Authority's own figures,¹ Greater Manchester has at least 1,000 hectares of brownfield land across 439 sites which have not yet been developed for housing or even have planning permission applied for and Stockport has many of these sites which have not yet been developed for housing. Taken together these sites have enough space to build at least 55,000 homes (assuming a density of 55 homes per hectare). That's almost a quarter of the entire Greater Manchester target. This is just a pilot exercise and I am confident there are more sites to be found. However releasing greenbelt land will totally undermine any incentive for these sites to be developed as green field sites are more attractive, more straightforward, and more profitable to developers.

Secondly, Greater Manchester Combined Authority needs to tackle the familiar issues that prevent development of urban land such as: split ownerships, land banking, unrealistic expectations of land value, access, and land contamination.

The most pressing of these is land banking, which is being allowed to occur at an alarming rate. Looking at Stockport, according to research by the Local Government Association, in March 2015 there were 2,009 residential units with planning permission granted but for which construction was unimplemented – and these units were all on sites not on greenbelt land, but on urban sites for redevelopment.²

It is troubling that this is almost double the number from the previous year (2014 = unimplemented planning permissions for 1,105 units) and almost triple from two years before (2013 = unimplemented planning permissions for 715 units). Land banking in Stockport is increasing at a near exponential rate, while across all England the trend in unimplemented planning permissions is much flatter. See Chart 1 below.

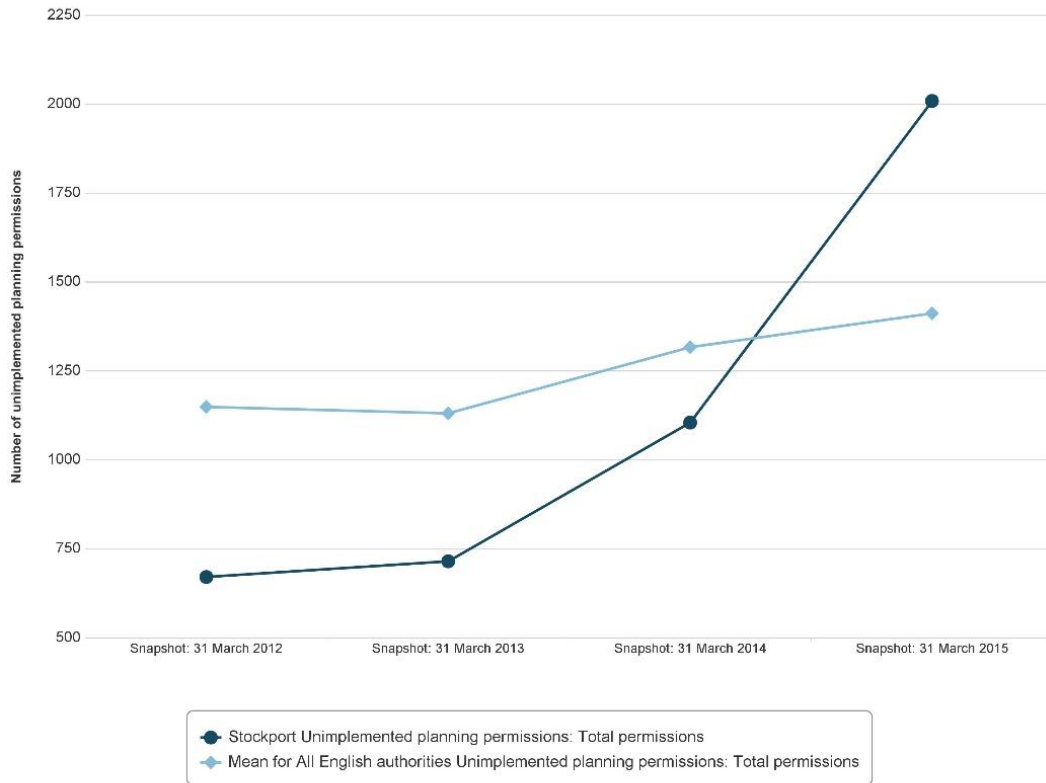
On interrogating the Stockport figures further, it becomes apparent that while the number of granted permissions for developments in the Borough are increasing the rate of building is in fact slowing, leading to a huge gap between what the local authority is permitting to be built and what building is actually taking place. This phenomenon is displayed starkly in the Chart 2 below³ - where the dark blue line represents residential units where building is taking place and the light blue line, where permission is granted but construction is un-started i.e. are subject to land banking. Of the 2,009 residential units referred to above as unimplemented, i.e. incomplete, 1,744 permitted homes were un-started while a mere 265 were under construction as of March 2015. The number of homes under construction has fallen each year since 2013 and in 2015 was only just over half that of 2013.

¹ Source: [Greater Manchester Open Data Infrastructure Map](#)

² Research has been carried out by the Local Government Association (LGA) and Glenigan into unimplemented planning permission for the 2014/15 financial year. - <http://www.local.gov.uk/mapping-unimplemented-planning-permissions-by-local-authority-area>

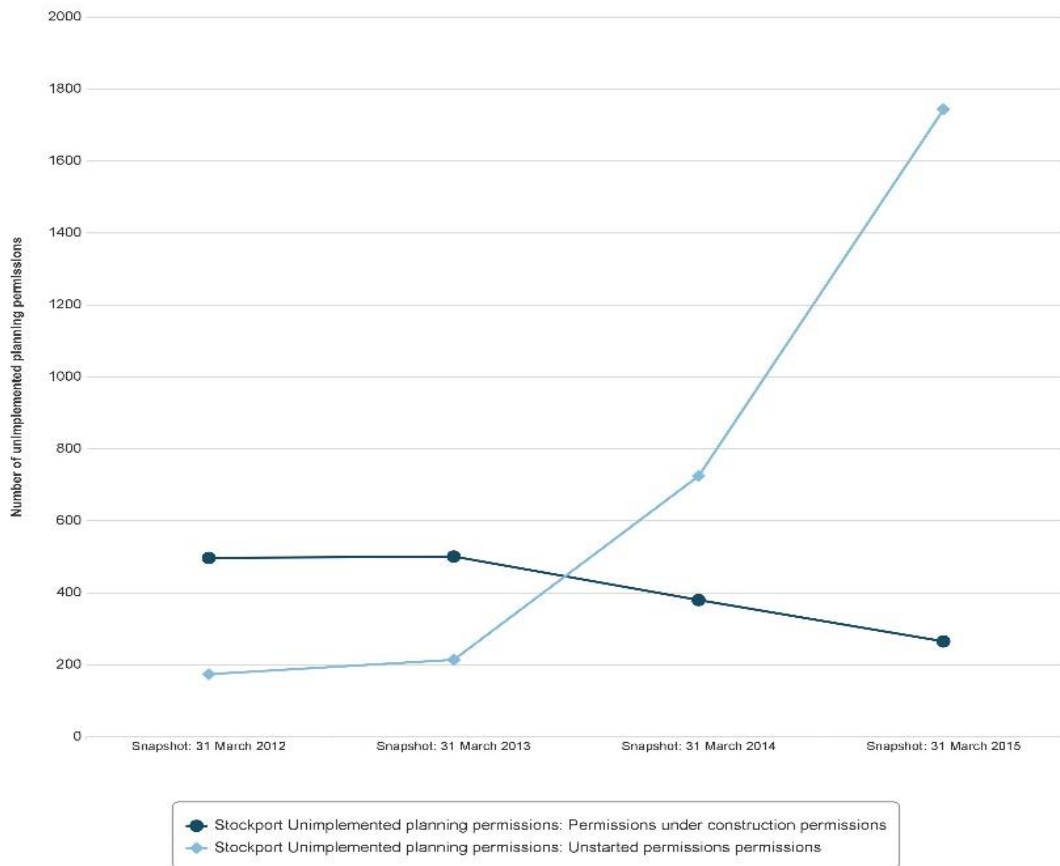
³ Ibid.

Total unimplemented planning permissions: Stockport & All English authorities



Powered by LG Inform

Permissions under construction & Unstarted permissions: Stockport & All English authorities



Powered by LG Inform

This is only a snapshot from each year, but the trend is clear and stark; developers are failing to build on sites even when planning and to utilise available brownfield land, and more over the speed of construction is slowing. This not only further widens the gap in housing supply, it means regeneration of suitable urban sites is delayed, and it puts undue pressure to release greenbelt land. **I therefore call on the Combined Authority, as part of the GMSF, to urgently review what can be done to reduce the amount of 'land banking' across all its constituent boroughs so that brownfield sites can be developed as a priority, and to incorporate these measure into the GMSF.**

Thirdly, to make housing in urban areas attractive to new owners and tenants, we need to make towns places where people want to live, with pleasant safe surrounding and the right facilities, amenities, public services, education and healthcare centres, recreation land, retail space, and transport infrastructure. The provision of such vital amenities has been treated in a cursory manner at best in the Draft Framework, and some selected sites have no mention certain services in their site specific draft plans. **The Combined Authority must give much more regard to the availability and capacity of current amenities in areas where developments are proposed by the Framework, and ensure that these services and infrastructure will not be overloaded, or that new such amenities are fully included in developments.**

The need to release any greenbelt land, as currently proposed in the Draft Framework, should be reassessed in light of these steps taken to prioritise the development and regeneration of urban brownfield land of which there is a demonstrably significant supply.

Additionally the aim of prioritising brownfield development could be achieved by creation of a Development Corporation, or similar body, with responsibility for regeneration of for Greater Manchester, and with a remit to recycle land and to create places fit to live in.

PUBLIC SUPPORT

Since September 2016 I and neighbouring MPs have been collecting signatures on petitions declaring *that the Greater Manchester Spatial Framework should avoid large-scale residential development on the greenbelt, which is a valuable barrier to urban sprawl and is hugely valued by local people; and further declares that brownfield land should be prioritised for residential development provided that proper infrastructure is in place.*

On Tuesday 13th December and MPs representing Cheadle and Bury North, presented petitions on behalf of thousands of our constituents who are opposed to this massive scale development on the greenbelt and to prioritise building on brownfield land instead. In Hazel Grove constituency alone, in which the High Lane site is proposed, over 4,000 signatures have been collected.

The huge support for my petition shows the strength of feeling about this spatial strategy which seeks to reclassify large areas of greenbelt clearly does not reflect the developments that local people want.

The strength of local opinion is clear to see, the voices from not only my own, but neighbouring constituencies, are clear: the greenbelt should be safeguarded and previously developed land (brownfield sites) should be prioritised for housing.

This concern is not just limited to those who signed petitions. As the contributions from a dozen MPs in leads Westminster Hall debate on the subject of the Greater Manchester Spatial Framework (Wednesday 14th December) demonstrates, this is a feeling shared by members of the public right across Greater Manchester. For reference the debate can be read here - <https://hansard.parliament.uk/Commons/2016-12-14/debates/16121449000001/GreaterManchesterSpatialFramework>

WILLIAM WRAGG MP – GMSF SUBMISSION CONCLUSIONS & KEY FINDINGS

- **The strength of local opinion is clear to see, the voices from not only my own, but neighbouring constituencies, are clear: the greenbelt should be safeguarded, and previously developed land (brownfield sites) should instead be prioritised for housing. Greenbelt should not be used for housing development on the scale currently being proposed in the Draft Framework.**
- **We need to provide new homes in order to fill the housing shortage, but this should be done in a way which is sensitive to both the local environment and the wishes of local communities.**
- **I and the thousands who signed local petitions are not against house building; but we believe brownfield sites which have had development on them previously, should be prioritised for the building of houses, and not greenbelt. This not only protects the countryside, but focuses development where regeneration is needed and where the necessary infrastructure already exists.**
- **I call on the Combined Authority to defend the robustness of its population growth forecasting, as it moves towards finalising the Framework. The Combined Authority should also confirm whether, in deriving the figure for housing need, it took as its basis actual projected need, or an aspirational need, based on projected economic growth above the national average.**
- **Greenbelt land is designated the following reasons:**
 - **The greenbelt is a vital barrier to urban sprawl and is hugely valued by local people.**
 - **Our local roads, infrastructure, and transport capacity already struggle with existing demands. These proposals for massive developments in rural areas will only make matters worse.**
 - **The greenbelt encourages regeneration of our towns and makes best use of our land.**
 - **Greenbelt protects the countryside and all the benefit that brings.**
- **The redevelopment and reuse of land in urban areas, so called brownfield sites, should take priority over greenbelt sites. If we make sites in the greenbelt available now, then the opportunity for real regeneration in Stockport, and other Greater Manchester towns, will be lost for a generation.**
- **Greater Manchester has at least 1,000 hectares of brownfield land spread across 439 sites which have not yet been fully developed for housing, enough to build at least 55,000 homes, and it is likely more such land can be found.**
- **The Combined Authority should urgently review what can be done to reduce the amount of ‘land banking’ across all its constituent boroughs so that brownfield sites can be developed as a priority, and to incorporate such measures into the GMSF.**
- **The need to release any greenbelt land, as currently proposed in the Draft Framework, should be reassessed in light of these steps taken to prioritise the development and regeneration of urban brownfield land of which there is a demonstrably significant supply.**
- **The Combined Authority must give much more regard to the availability and capacity of current amenities in areas where developments are proposed by the Framework, and ensure that these services and infrastructure will not be overloaded, or that new such amenities are fully included in development proposals.**