Response to The Greater Manchester Plan for Homes, Jobs and the Environment: The Greater Manchester Spatial Framework.

GM Allocation 17 – Hanging Chadder

MARCH 15, 2019

SAVE ROYTON'S GREENBELT COMMUNITY GROUP

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1. Opening Statement

To whom it may concern

RE: GMSF 2019 Consultation: GM Allocation 17 – Hanging Chadder

We are writing to respond to the consultation on The Greater Manchester Plan for Homes, Jobs and the Environment: The Greater Manchester Spatial Framework. In Particular, with regards to **GM Allocation 17 – Hanging Chadder**

We strongly oppose the proposed use of Green Belt land at **GM Allocation 17 – Hanging Chadder**, for the provision of housing, for the reasons listed below and overleaf.

We represent a large and powerful community group called "Save Royton's Green Belt". We are the primary organiser of the Tandle Hill Country Park protest march on Sunday 3rd March 2019; the event saw over 4,000 people march and gather at the Tandle Hill mount, and received coverage on all the main regional news bulletins.

The reason we chose Tandle Hill as the location for our protest is because in Royton it is synonymous with democracy and political failure. A war memorial stands erect at the mount of the Hill, a timeless reminder of how it is usually ordinary people who pay the highest price for political impotence. This year also marks the 200th anniversary of the Peterloo massacre; this event has a special connection to Tandle Hill because it is here where the radicals trained and practised their manoeuvres. And in March of this year as well as in January 2017, Tandle Hill once more gave a voice to the people of Royton in the face of political insouciance

In this document we outline our main concerns with the Greater Manchester Spatial Framework. First, we question how the GMSF can be reconciled with the National Planning Policy Framework and the primary purpose of the Green Belt. We then consider the onerous impact on infrastructure in the local area and the harmful effect on wildlife and the environment. Finally, we submit the evidence base to objective forensic scrutiny and expose multiple failings. In conclusion, we discuss how the consultation could be improved to take better account of public sentiment and create a more democratic process.

Our group has the backing of nearly 3,000 people on Facebook as well as the implicit support of countless others in the community, and this document puts forward our collective concerns about the GMSF.

We strongly urge the Greater Manchester Combined Authority to give serious consideration to the comments contained within this document.

2. Our concerns about the proposed use of this Green Belt land for the provision of housing and commercial development

The proposed future use of all this site is particularly ill-considered. It is located within the established green belt and these proposals go completely against the five purposes of Green Belt Policy set out in the National Planning Policy Framework.

Our members have real concerns about proposals in the Greater Manchester Spatial Framework which earmark substantial areas of Green Belt land for largescale development. This represents a short-sighted approach, which threatens the future of these much-loved and well used areas of land.

Clearly if developers are given the choice between developing a green open space or regenerating previously developed Brownfield land, the choice they will make is obvious.

In the GMSF we need an intelligent plan which looks at how we can focus development on our Brownfield sites – encouraging the redevelopment and regeneration of these urban areas of land. Such a plan could bring back to life empty and in some cases neglected former factory sites, whilst channelling investment to the struggling town centre of Oldham. The development of these sites should be the priority of the Greater Manchester Spatial Framework.

The strategic aims of the Greater Manchester Spatial Framework should support both the current and future needs of local residents. Proposals should be balanced, considering the needs of current and future generations of residents. Plans should not promote development at the expense of a good quality of life for those residents.

Green belt Policy states that green belt land exists as an area that is kept permanently open and that this is the essential characteristic of these reserves of open space. The main purposes of the Green Belt Policy are set out in the NPPF. It is clear to us that the site at Hanging Chadder performs all of these purposes, and that significant harm would occur as a result of its development for housing. It is clear that the Hanging Chadder site performs these roles as follows:

a) *to check the unrestricted sprawl of large built-up areas;*
   The urban area of Oldham, as part of the Greater Manchester conurbation, is subject to significant pressure for green filed development. Without the protection of the green belt policy the city would be subject to a far greater degree of urban sprawl and unfettered development
b) *to prevent neighbouring towns merging into one another;*
   The site sits in an important position between a number of large urban areas. Oldham, Manchester and Royton all represent significant and large areas of urban development that would coalesce as a result of the development of this site.
c) *to assist in safeguarding the countryside from encroachment;*

The Hanging Chadder site represents an excellent example of open countryside. The development of the site for housing would undoubtably represent encroachment by development.

d) *to preserve the setting and special character of historic towns;*
There are a number of Conservation Areas and Listed Buildings within the historic cores of surroundings towns that could benefit from investment and development which would be housed on this site. The development of this site would result in much needed demand for housing which could be directed to the preservation and reuse of these 'difficult' buildings and areas.

e) *to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.* The recycling and reuse of urban land is the product of the demand or need for the development reaching a level that the development of these more difficult sites becomes viable. The development of alternative sites of course puts this reuse at risk. There has been no assessment of the harm that the allocation of this site for housing would have on the efforts and investment that the Council has made to try and encourage urban regeneration.

Green belt offers a great many benefits for both urban and rural populations. By preventing the urban sprawl, it helps protect agricultural activities and the unique character of rural communities. Urban population, in turn, is provided access to open space which offers opportunities for outdoor activities and access to clean air.

National Planning Policy makes it clear that only in exceptional circumstances, can it be possible to change the boundaries of an established green belt. However, such cases are very rare and should only be explored if no other site for the buildings can be found in the urban centre or outside the green belt and there is an existing suitable infrastructure to support the buildings.

Green Belts significantly improve air quality and help combat a high number of environmental problems.

The UK government therefore encourages local authorities to protect the land around the towns by maintaining green belts.

In response to concerns that MPs raised about the protection of Green Belt land in 2016, the former Planning Minister Brandon Lewis said that:

"The Government has put in place the strongest protections for the Green Belt. The Framework makes it clear that inappropriate development may be allowed only where very special circumstances exist, and that Green Belt boundaries should be adjusted only in exceptional circumstances…we have been repeatedly clear that demand for housing alone will not change Green Belt boundaries."

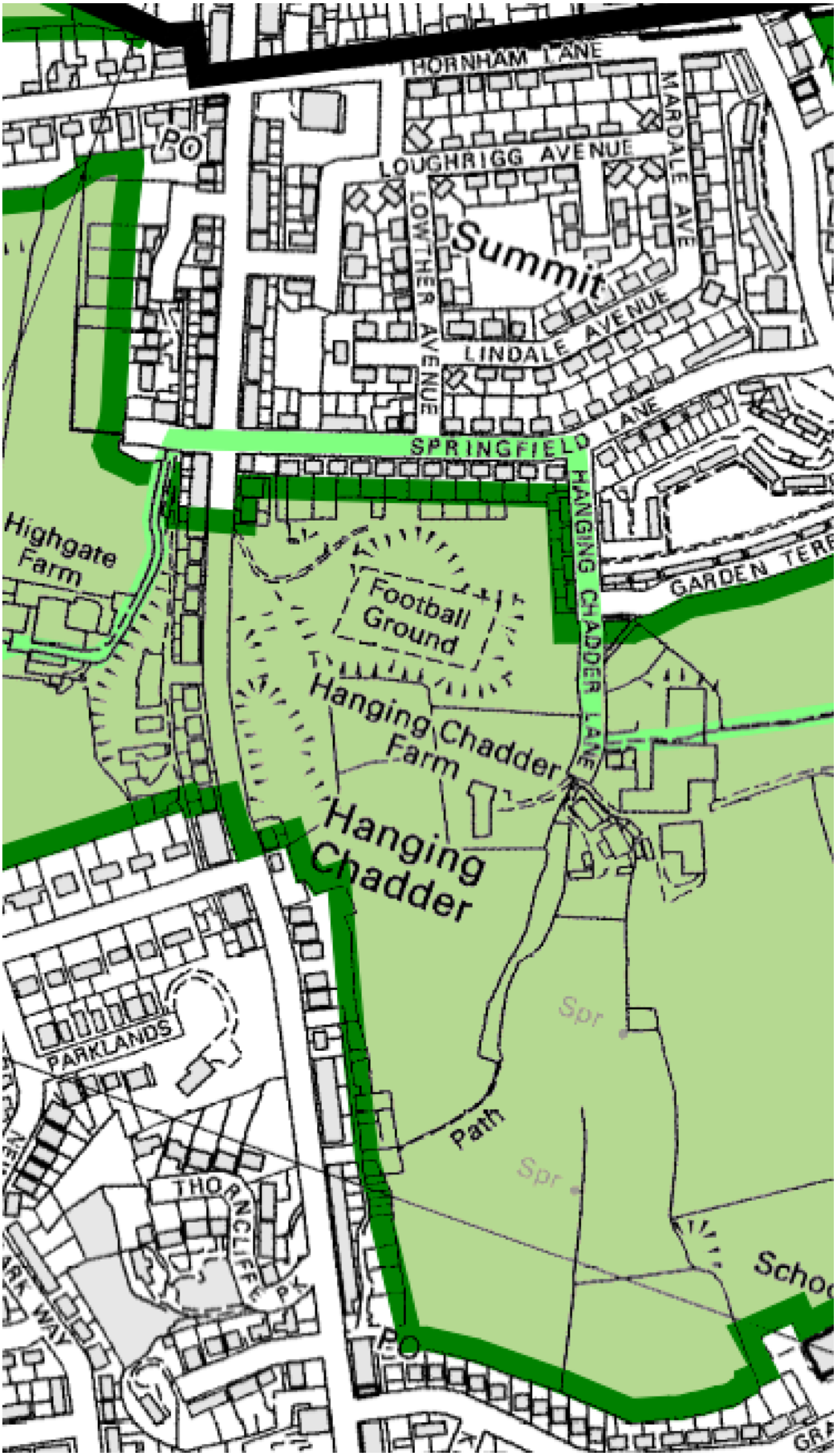
There are no exceptional circumstances to justify these GMSF proposals showing a clear disregard for Green Belt Policy and the wellbeing of Royton's existing and future residents. There are many Brownfield sites in the Oldham Borough and derelict sites, old mill buildings and areas in need of regeneration that should be used. In addition, Kit Malthouse MP and Minister of State for Housing, in a letter to Jim McMahon MP dated 5th March 2019 stated:

"On Green Belt specifically, I would like to reaffirm that only in exceptional circumstances can a strategic policy-making authority establish the need to alter a Green Belt boundary, using the Plan process of consultation and examination (paragraph 136-137). In fact, the revised National Planning Policy Framework strengthened this policy by saying that local authorities should show fully evidenced justification for a Green Belt boundary change (paragraph 136).

There is no evidenced justification for this site to be removed from the green belt. More specifically, this proposed site is particularly important to the local community of Royton. Hanging Chadder currently provides a green space between the existing densely populated settlements on Rochdale Road, Grasmere Road housing estate, Fir Lane, and the housing estate of Thornham. Building any houses here would create an un checked urban sprawl and would cause neighboring settlements to merge into one another. The site provides a natural break and green space between existing historic settlements and provides quality grazing land for a variety of animals used in food and dairy production. The designation of this area as green belt also helps to shift development pressure onto the areas of Oldham that need it most. These areas are often previously used and derelict and need to be recycled in order to encourage urban regeneration.

The Hanging Chadder site also contains an area that should be protected as a valuable public space because of its historic use as a playing field, and because the public have been using it freely for such a long time. It is clearly documented on the UDP map on the next page.

The pond on Hanging Chadder adjacent to Castleton Road, is also currently a valuable community asset. At many times of the day, local children and families can be seen viewing the horses that drink there.


THORNHAM LANE
PO
LOUGHRIGG AVENUE
MARDALE AVE
LOWTHER AVENUE
Summit
LINDALE AVENUE
LANE
SPRINGFIELD
HANGING CHADDER LANE
Highgate Farm
Football Ground
Hanging Chadder Farm
Hanging Chadder
GARDEN TERR
PARKLANDS
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Path
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THORNCLIFFE PL
PARK WAY
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The pond also supports a wealth of wildlife, including large numbers of annually returning migratory Canada Geese. It also houses a diverse wealth of wildlife including some endangered species. The wildlife includes water voles & great crested newts. This area of land is an important asset and offers many benefits to the local communities who visit it, to the places they are set in and to the nature that they host.

We urge the Combined Authority to think again on the proposals that could see us lose important areas of Green Belt land like this in the Royton area.

3. Our concerns about Transport, Roads & Increased Pollution in Royton

The main proposed access point, for the Hanging Chadder site, according to the Concept plans produced by OMBC, is on Castleton Road. This is designed to serve more than 75% of the properties on the development and is within 100 metres of Thornham Saint James Primary School, which sees around 240 children aged between 4yrs and 11yrs arrive and be collected on each school day. This already causes double parking on both sides of this stretch of Castleton Road and other neighboring residential streets. Any increase in traffic at this location would greatly increase the potential for an innocent child to be fatally injured.

The other proposed access point for this development is shown to be directly onto Rochdale Road, between two blocks of terraced properties, obscuring the view, both left and right, to motorists trying to egress onto a busy main road. The junction would also be significantly below the level of the road, meaning that the access road would need to be built up to a higher level that the rear gardens of the Rochdale Road properties, harming their outlook and amenity.

Rochdale Road is the main arterial route between Rochdale and Oldham and already experiences large volumes of traffic at all times. This road, between Rochdale and Oldham, runs directly past this site between the area that used to be served by Rochdale A&E department, which closed a few years ago, and Oldham Royal A&E department. This road, therefore, experiences a constant stream of Emergency Ambulances. Any further housing in this area will undoubtedly lead to more traffic, potential patients and more ambulances. These factors would compound the already increased noise and air pollution and road safety issues.

A 'strategic' plan would need to cater for the transport needs of residents, industry and businesses but Royton's roads have been at full capacity for many years resulting in nose to tail traffic every morning and evening rush hours. Many have not been resurfaced for decades and are in a poor state of repair. The main routes into and through Royton are bordered by terraced properties leaving no prospect of widening.

Public transport in this part of Royton is limited to infrequent and unreliable bus services despite a sizable existing population. There is no Metrolink or railway provision in Royton and access to the nearest motorway junctions, train or tram stations is via the busy roads described above. The effect that extra traffic and longer traffic queues will have is to push increased poisonous carbon emissions into the local atmosphere, negatively impacting the air-quality. This has been proven to directly contribute to hundreds of premature deaths each year.

The loss of the green belt in this area will also remove large portions of green space that currently act as 'green lungs' to the current settlements in Royton.

Road safety and pollution would undoubtedly be made worse by this huge increase in traffic. There is much evidence to suggest that air pollution causes significant harm to the environment and to the health of our communities. Transport is the biggest source of NO2 and PM10 and is a major contributor to carbon emissions.

The National Planning Policy Framework states that:
"To prevent unacceptable risks from pollution and land instability, planning policies and decisions should ensure that new development is appropriate for its location. The effects (including cumulative effects) of pollution on health, the natural environment or general amenity, and the potential sensitivity of the area or proposed development to adverse effects from pollution, should be taken into account…"

Further development, particularly through the development of our green spaces in Royton will have a negative impact on the health of local residents due to increased air pollution from the additional car movements. The recently published Greater Manchester Low Emissions Strategy states that:

"Poor air quality has a real and significant effect on people's lives, contributing to cancer, asthma, stroke and heart disease, diabetes, obesity, and changes linked to dementia. Long-term exposure to out-door air pollution is understood to be a contributory factor in deaths from respiratory and cardiovascular disease…"

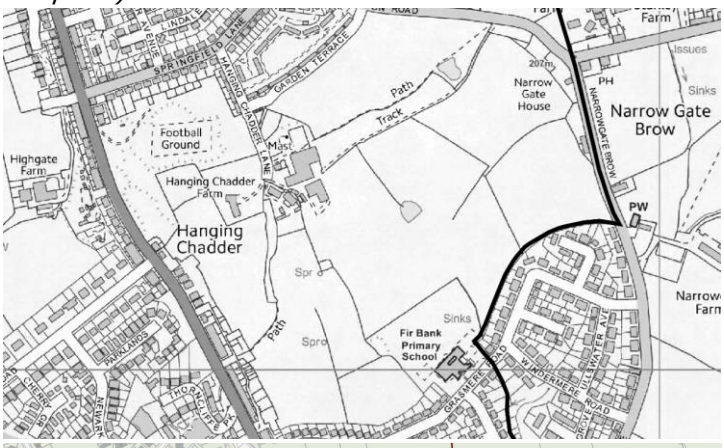
4. Our concerns about Infrastructure in Royton

The water supply, drainage and sewer systems in Royton date from the 19th century and are at full capacity, a recent sewer collapse which closed the main arterial route between Oldham, Royton and Rochdale for a week adjacent to the Hanging Chadder site demonstrates this.

Local electricity and gas supplies date back to the early/mid-20th century and were never designed to cater for the modern energy consumption levels. Localised power cuts due to overloaded/faulty substations are common.

Roadside drains in the areas cannot cope with the increasingly wet weather leading to localised flooding as recently experienced on a road that would be expected to serve the Hanging Chadder site. Because of the already lack of natural water retention of the land, any covering of the substrate land with buildings, access roads and paths will result in less surface area to absorb future precipitation, resulting in more flooding to residencies and roads at a lower level than the proposed site. This would definitely apply on this proposed Hanging Chadder site with Rochdale Road, Garden Terrace, Castleton Road, Narrowgate Brow, Fir Lane and Grasmere Road already experiencing flooding issues from this elevated land.

The topography of the land on this site contains a mixture of soft sand pockets and large dense seams of clay which are just under the relatively thin layer of topsoil. This topography has formed many natural underground water culverts that emit rainwater onto local roads, paths and local resident's gardens. Flash flooding is already extremely common following any heavy rainfall as the soil cannot retain the precipitation to allow slow release. We note, from the Concept plans for this site that some form of flood defence drainage system is proposed (SUDS) but these type of drainage systems are only effective if dealing with a limited flow of top water. This area has many deep, winding underground culverts and springs and sinks as the UDP map below demonstrates, which has already caused issues that Oldham Council and Unity Partnership have tried to contain. We understand they paid the landowner to install a form of SUD, which according to residents of Grasmere Road, has compounded the flooding issues. ***A sustainable drainage system is designed to reduce the potential impact of new and existing developments with respect to surface water drainage discharges.*** *(source Wikipedia)*



The obvious developer led requests and influence for Green belt sites to offer more desirable and aspirational homes is clear. The site preparation costs of Greenfield sites generally being more competitive than complex Brownfield sites is an error of judgement in the case of Hanging Chadder and Thornham Old Road. This in part is due to the complex nature of natural springs,

existing flooding and flood risks, gradients of sites versus existing dwellings and critical use of greenfield run-off. Independent flood authorities' advice and residents will cite the material consideration of pre-commencement planning condition's across Hanging Chadder and also Thornham Old Road. The curious timing of OMBC funding Utility Partnership to create natural drainage systems of SUDS is woefully inadequate. Attempts to use public funds to prepare future planning sites is a mis-use of public funds. Detention basins, French Drains etc. will not comply with the Flood Authorities minimum standards and preparations for one-in-one-hundred-year flood events. The developer must bear these costs, estimated to be in the region of £4million pounds per site plus retro fitting flood defences for every home that surrounds the land locked Green Belt areas inside Hanging Chadder and Thornham Old Road.

The Flood Risk Assessment/Drainage Strategy submitted to the Local Planning Authority must be designed to accommodate the minimum 1 in 100 year, plus climate change and urban creep (100% at Hanging Chadder) and critical storm events.

It will be proposed by developers that surface water will be disposed of via existing watercourse at a rate of 1l/s. This rate of discharge is too low as pipes will be sized too small and will increase the risk of blockages in the future. It is recommended that a minimum rate of 1.4 l/s is adopted unless greenfield runoff rates can conclusively prove otherwise. The GMSF site plan currently removes short of 100% of the greenfield runoff, therefore this will be inadequate.

The Drainage Strategy will require the substantial volume of water from Hanging Chadder and Thornham Old Road to be attenuated, and storage for the whole site and Hydro brakes. Storage requirements must be designed to a 1 in 100-year rainfall event. They must be designed so that surface water is completely contained within the drainage system for all events up to and including the 1 in 100-year rainfall event and designed so that no flooding occurs within properties or infrastructure during a 1 in 100-year rainfall event. All calculations must include minimum additional allowances of 30% for climate change and the 100% for urban creep planned for Hanging Chadder versus 10% Urban creep normally sized for. Micro-drainage calculations will be necessary to assess the storage requirements are adequate. Hydro brakes to hold and release the water volume will be required the length of Rochdale Road and Grasmere Road.

An appropriate Exceedance Flow Plan for the site must be submitted to and approved in writing by the Local Planning Authority. Site design must be such that when SuDS features fail or are exceeded, exceedance flows do not cause flooding of properties on or off site.

Flood Authorities independent of Local Planning Authority have not previously approved flood defences in known flood areas based on the 100 % urban creep planned for the land locked site of Hanging Chadder. Urban creep is assumed to be 10% over time versus the proposal of GMSF and OMBC.
Furthermore, the removal of trees, shrubs and grassland to make room for these houses and access roads would have a dramatic effect on the ecology of the area and make the surrounding land even more unstable, risking landslip.

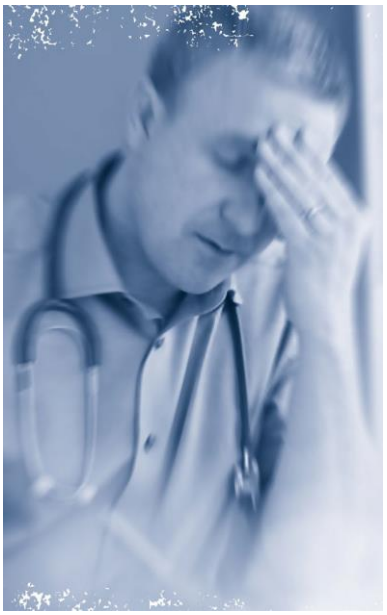
5. Our concerns about our already overstretched Education and Health Provisions in Royton

A 'strategic' housing plan would need to cater for the education and health provision of the people intended to live there. We have serious concerns about the lack of consideration that is being given to the impact that proposed new housing developments could have on local services, including on demand for school places and on GP practices in Royton. Whilst it would appear Royton is well served with schools; they are already at full capacity with every primary and secondary school in the area, already struggling to cater for the current population.

Likewise, the local health services are all struggling to keep up with demand and it is common to expect a 4 to 5 week waiting period to see a local General Practitioner. We are extremely concerned about increasing demands caused by the number of extra people proposing to be moved into the catchment area of these already overstretched Royton GP practices.

The local hospitals are also already hugely overstretched with Accident and Emergency departments in crisis. Since the closure of the Rochdale Infirmary A&E department, this crisis has deepened. Ambulance response times are already a significant issue for this area. Due mainly to all the A & E patients from neighbouring Rochdale that would have been taken to Rochdale A&E, now having to travel directly through Royton to the Oldham A&E. Should congestion be increased, this would have significant implications on emergency care reaching the communities of Royton, Rochdale and Oldham in good time. This situation would also be exacerbated with such the huge increase in population being proposed in this GMSF plan, between Hanging Chadder GMA17, Thornham Old Road GMA21, Cowlishaw GMA16 and the Beal Valley GMA14 in the immediate area. This is without mentioning the other local proposed sites at Stakehill GMA2, Broadbent Moss GMA15, Kingsway South GMA2, Broadbent Moss

GMA15, Robert Fletchers GMA18, South of Rosary Road GMA19, Spinners Way GMA20, Woodhouses GMA22, Castleton Sidings GMA24, Smithybridge GMA26 and Newhey Quarry GMA27. All these 5,880 additional homes would be expected to be served by Oldham Royal Hospital Accident & Emergency Department.



It appears that the impact of these proposed housing developments and the associated local population growth on local GP services is not being given proper consideration in the planning process. We are very concerned that this is an issue which is being totally ignored by the GMSF and, no thought or planning has gone into maintaining our already overstretched Health Services. This situation is not sustainable.

We believe that the GMSF fails to take into account the impact that sizeable developments would have on our local services. In fact, it appears that little or no analysis has been made of the impact of these developments on our services and infrastructure.

6. Brownfield first and higher density housing in town centres

The Government's 2014 web-based Planning Practice Guidance sets out that unmet housing need in a particular area is unlikely to meet the "very special circumstances" test to justify Green Belt development:

"Unmet housing need (including for traveller sites) is unlikely to outweigh the harm to the Green Belt and other harm to constitute the "very special circumstances" justifying inappropriate development on a site within the Green Belt".

Whilst we would welcome plans to introduce more affordable housing to ensure local people are able to access the property ladder, the need for affordable homes is not considered justification for removing these areas of land from the Green Belt. The National Planning Policy Framework makes it clear that the construction of new buildings should be regarded as "inappropriate" for the Green Belt. While there are some exceptions, the development of affordable housing is not permitted as one of the exceptional circumstances.

Local green spaces serve as a green lung for otherwise built-up areas of Royton. We support the principle of focusing development, wherever possible, on Brownfield land. Given the large availability of Brownfield land across Oldham MB, we question the need to remove any land from Royton's Green Belt.

The Campaign to Protect Rural England stated in September 2015:

"There is still progress to be made to optimise the value of the significant amount of vacant and neglected previously built land (Brownfield) across Greater Manchester. The latest National Land Used Database shows that Greater Manchester has 2,721 hectares, the highest amount of Brownfield land in the North West, which does blight areas when left in a neglected and vacant condition."
"CPRE believes the GMSF must focus attention on bringing back into use this wasted land resource. Land assessed as suitable for housing in Greater Manchester is 1,309 hectares and at an average build out rate of 40 houses per hectare this equates to 52,360 houses. It would be perverse if Brownfield land, which is generally located in more central and therefore accessible locations is not successfully reused in advance of allocating further greenfield land."

The development of Brownfield sites first is a more sensible approach to house building. These areas tend to be closer to urban centres and near to existing infrastructure. Intelligent planning on the future of these sites would also encourage local regeneration. These sites also tend to be smaller and lend themselves better to affordable housing for our expanding population.

We do not believe that the GMSF has done enough to promote its "call for sites" and many Previously Developed Land and Brownfield site owners have not been made aware enough of the opportunities to submit their sites to the council for future development. We believe that there are more than sufficient Brownfield sites and land already with existing planning permission in the Oldham borough to satisfy at least the next five year's demand for housing and commercial property. We suspect that developers are land banking these sites and call for a Government inquiry into the practice.

Rather than lose our green spaces forever, we should be focusing on regenerating our towns and cities and encouraging people to reside in these areas. A shift to a high-density town centre-centric strategy could also be a solution to the decline of the high street. Town centre based living would encourage people to buy more locally and less off the internet. A revitalised town centre based local economy would also raise revenue from business rates for the council.

We also strongly believe that the government should make funding available to demolish and decontaminate previously developed brownfield sites, to make them equally attractive to developers than green open spaces.

7. The GMSF proposals will damage the Ecology and Wildlife that currently thrives in our Green Belt

There is a large concentration of wildlife and ecology that flourishes on the Hanging Chadder site that would be damaged irreparably if development was to be allowed.

The biodiversity of Royton's Green belt will be seriously impacted by these proposed developments, with adverse impacts on priority species and habitats identified of principal importance at a National, Greater Manchester and Local level. The State of Nature report 2016 showed that over half (56%) of UK species assessed have declined since 1970, and that 15% of species in Great Britain are thought to be extinct or threatened with extinction. More than one in ten (1,199 species) of the nearly 8,000 species assessed in the UK are under threat of disappearing from our shores altogether. Biodiversity 2020: A strategy for England's wildlife and ecosystem services states a pledge to:

"halt overall biodiversity loss, support healthy well-functioning ecosystems and establish coherent ecological networks, with more and better places for nature for the benefit of wildlife".

The Hanging Chadder site is currently a haven for many species of birds, animals and creatures, many of them protected species. These should be left undisturbed in their natural habitat to maintain the overall quality of the local ecology.

8. Our Members show their disapproval of The GMSF proposals to use Green Belt

We have a Facebook site known as "Save Royton's Greenbelt" with more than 2800 registered members and growing in membership daily, as more and more people learn of the proposals to develop on Royton's green belt.

Recently, a demonstration march took place on Sunday 3rd March this year, organised by our members, in protest against these GMSF proposals. This march commenced at the **Hanging Chadder GMA17** proposed site and the protestors then marched the length of **Thornham Old Road GMA21**, to congregate at the monument in Tandle Hills, Royton. Despite terrible weather conditions, this march saw crowds of supporters in excess of 4000 people.

This huge attendance echoes residents' disgust at the potential loss of their "Open spaces", they currently enjoy as a break in the urban sprawl.

The march was also supported and attended by five of the six Royton Councillors. The sixth Councillor was out of the country on annual leave and was unable to attend on the day. Jim McMahon, MP for Oldham West and Royton also attended the Protest march to show his support for his constituents' concerns.

9. Outdated growth projections used to establish housing need

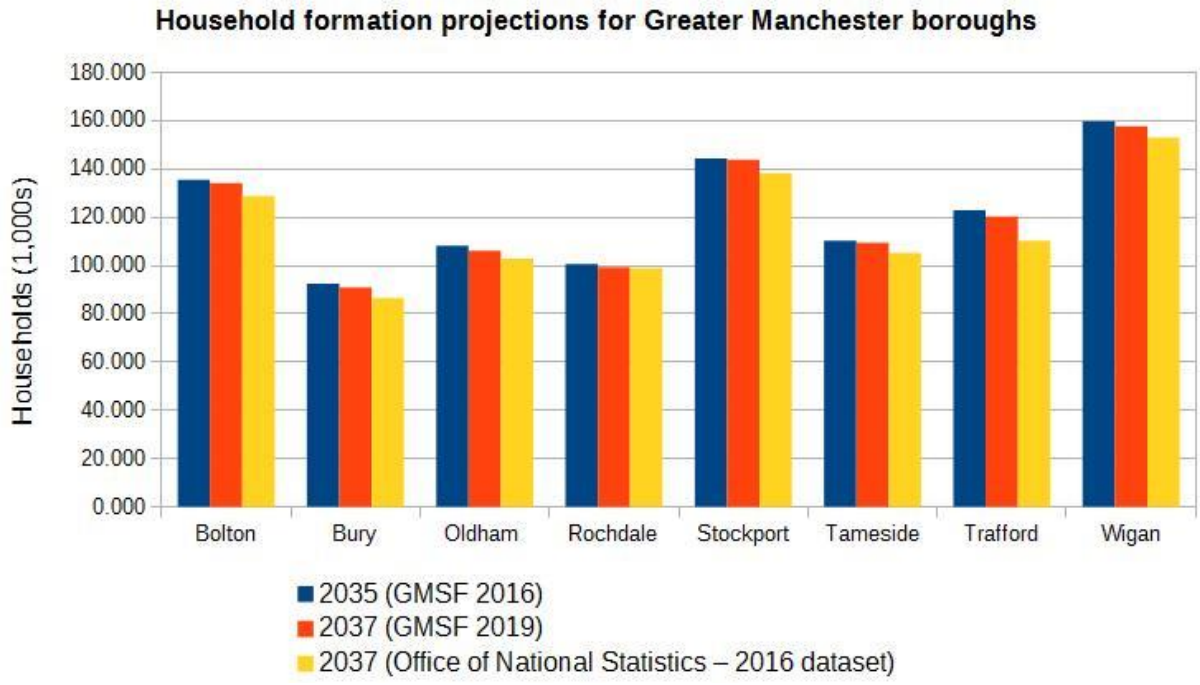
Concerns have been raised by the Campaign to Protect Rural England (CPRE) about the housing and jobs figures that are used as the basis for this Framework. Our members share these concerns. The CPRE has said that they believe that the projections made by the GMSF for housing and jobs rely on:

"...untenable economic growth assumptions, which are greatly in excess of baseline forecasts..."

If these figures have been over-estimated this means that our Green Belt and green open spaces are needlessly under threat from development. It is imperative that we do not over-estimate growth and threaten the future of our green spaces and the benefits linked to them. The CPRE goes on to state that:

"Such a huge scale of over-supply poses significant risks in terms of the ability of the GMSF to be implemented, and provision based on such inflated numbers cannot demonstrate exceptional circumstances for the proposed scale of Green Belt deletions."

The selection of the 2014 dataset and not the 2016 dataset (which projects lower household formation as illustrated in the bar chart below) has been one of the more controversial aspects of the GMSF evidence base. Not using the most recent dataset undermines what is supposed to be an objective and evidenced based approach. It is worth noting at this point that the National Planning Policy Framework requires changes to the Green Belt boundaries to be "fully evidenced and justified".



10. Empty homes not taken into account by the Local Housing Need methodology

The *Greater Manchester: Strategic Housing Market Assessment* (2019; pp. 150–151) highlights Oldham MB's appalling vacant home record. With over 3 percent (2,893) of all homes in Oldham MB vacant as of 2017, Oldham has the worst record in the whole of Greater Manchester. And with nearly 40 percent of those ongoing, Oldham also has the worst record for long-term empty homes, which stands at 1,126 dwellings as of 2017.

Table 5.12: Vacant dwellings 2017

Area	Vacant dwellings		Vacant dwellings that are Long Term Empty Homes*		% of vacant dwellings that are Long Term Empty*
	Number	% of total dwellings	Number	% of total dwellings	
Bolton	3,497	2.8	1,298	1.1	37.1%
Bury	2,484	3.0	957	1.1	38.5%
Manchester	3,787	1.7	1,324	0.6	35.0%
Oldham	2,893	3.1	1,126	1.2	38.9%
Rochdale	2,684	2.9	858	0.9	32.0%
Salford	2,734	2.4	1,004	0.9	36.7%
Stockport	3,087	2.4	1,119	0.9	36.2%
Tameside	2,588	2.5	1,080	1.1	41.7%
Trafford	2,321	2.4	702	0.7	30.2%
Wigan	4,227	2.9	1,359	0.9	32.2%
Greater Manchester	30,302	2.5	10,827	0.9	35.7%
England	605,891	2.5	205,293	0.9	33.9%

Source: MHCLG Live Table 615 All vacant dwellings by local authority district, England, 2017 and MHCLG Live Table 125: Dwelling stock estimates by local authority district, 2017

It is obvious from the data that Oldham and some of the other boroughs could address a sizeable chunk of local need with vacant properties. The 2016 draft of the GMSF (*Greater Manchester: Strategic Housing Market Assessment;* pp. 186–187) factored this in, and calculated that bringing vacant homes back into circulation offset Oldham's housing need by over 500 homes. It explains its rationale as follows: *"The amendment means that in the areas which have more vacant dwellings there would be an expectation that some of the household need would be met by the reuse of vacant dwellings."*

As flawed as the 2016 draft was, its commitment to tackling the vacant homes problem was a welcome and positive aspect. Unfortunately the 2019 draft of the GMSF does not factor vacant homes into its Local Housing Need methodology, and no explanation is provided for this inconsistency with the 2016 draft. This is a disappointing backwards step for the 2019 draft.

11. The Local Housing Need figure is being incorrectly interpreted as a "target"

Throughout the debate surrounding the Greater Manchester Spatial Framework, much has been made of the Local Housing Need figure, and how it should be interpreted and applied. Some Councillors that Save Royton's Greenbelt have been in discussion with have disparagingly referred to this figure as the "Tory target". While it is correct that to all intents and purposes the Government have indirectly created this figure (by imposing the 2014 dataset) there is significant confusion over whether this figure should be interpreted as a mandatory housing target that Greater Manchester must meet.

In a letter received by Councillor James Daly of Bury dated February 2019, Secretary of State James Brokenshire wrote that the housing need figure is "not a target" and should be the result of a "realistic assessment … using the standard method … This will then then be scrutinized, as part of the examination undertaken by an independent Inspector."
This point was further reiterated in a parliamentary debate on 21st February 2019 dedicated to the framework with Minister of State for Housing and Planning Kit Malthouse stating the Local Housing Need is just a "baseline". He offered the following clarification:

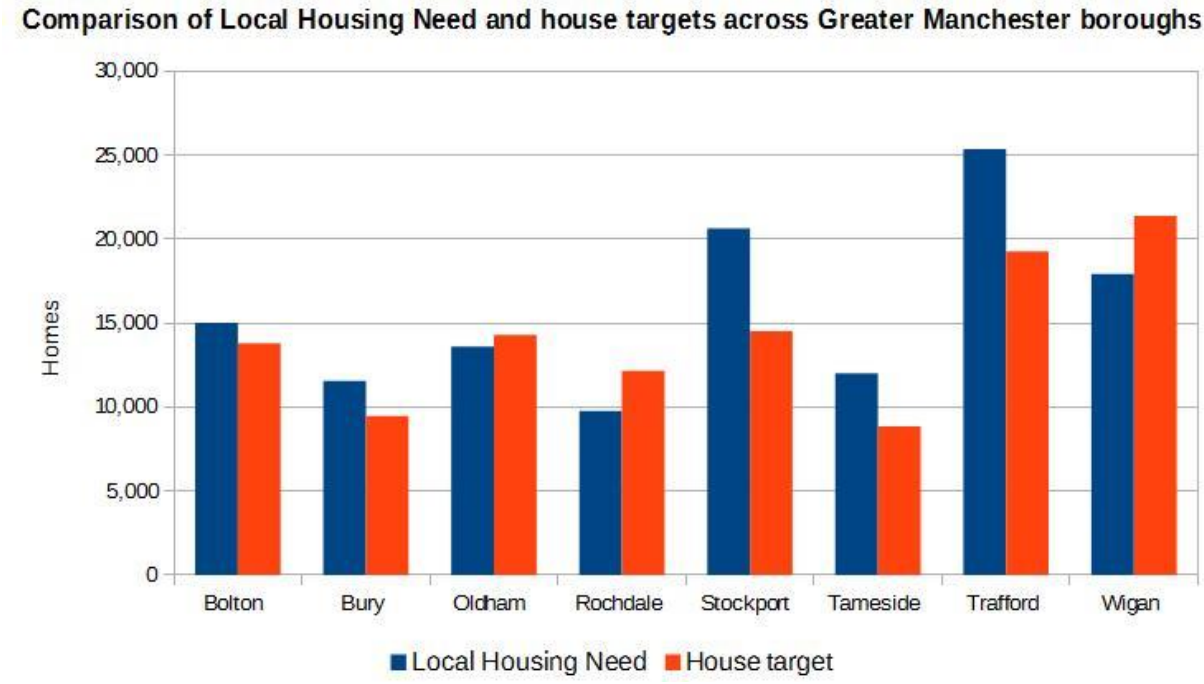
"Any inspector will accept a properly evidenced and assessed variation from that target … If, for example, you have constraints like areas of outstanding natural beauty or Green Belt, or whatever it might be, and you can justify a lower number, then an inspector should accept that."

Mr Malthouse confirmed this position in writing to Jim McMahon, MP for Oldham West and Royton:

"The expectation is that the standard method is used to identify the minimum number of homes needed per year (as set out in paragraph 60 of the revised Framework). However, the standard method does not provide a target that must be planned for. If using the standard method, authorities can establish an annual figure. They then plan how to meet that need by considering land availability, relevant constraints, including Green Belt and whether the need is more appropriately met in neighbouring areas."

12. The "off-loading" of housing targets across Greater Manchester is not a solution to the housing crisis

The Local Housing Need (LHN) for each borough or city across the country is established by a standardised independent methodology. In theory, each area should make enough housing provision available to accommodate their housing needs. However, as is apparent from the graph below, some boroughs are falling far short of their targets while others are substantially exceeding them. This is true of Oldham, who along with Rochdale, Wigan, Manchester and Salford have house-building targets that exceed their housing needs while Bolton, Bury, Stockport, Tameside and Trafford all have house-building targets substantially below their stated Local Housing Need.



The Local Housing Need is objectively evaluated for each district of Greater Manchester, which comes to a combined total of 201,000 homes. Based on this, Greater Manchester has set a policy target (Policy GM-H 1) of approximately the same number, yet the LHN and the targets do not match up for any individual city or borough.

The GMSF documentation provides no explanation as to why the individual borough targets do not meet the LHN targets formulated by the Government methodology. However, it is clear that the targets have been established so they add up to Greater Manchester's overall policy target, and it is obvious that if some boroughs "under-supply" others will have to "over-build" to meet the policy target.

An explanation was offered by William Wragg, a Conservative MP for Stockport during a parliamentary debate held 21st February 2019. Wragg praises the GMSF for redistributing housing targets across the county to where "land availability is greater". So what is essentially happening is that Green Belt is being saved in boroughs such as Stockport at the expense of

Comparison of Local Housing Need and house-build targets

Area	Local Housing Need	House target	% of LHN
Bolton	15,029	13,800	92
Bury	11,552	9,470	82
Manchester	49,096	54,530	111
Oldham	13,604	14,290	105
Rochdale	9,766	12,160	125
Salford	26,068	32,680	125
Stockport	20,653	14,520	70
Tameside	12,008	8,850	74
Trafford	25,365	19,280	76
Wigan	17,936	21,400	119
Greater Manchester	**201,077**	**200,980**	**100**

places like Oldham, Rochdale and Wigan. Clearly, the burden of supplying new homes is not evenly shared by the constituent boroughs.

Given that Royton, Shaw & Crompton and Chadderton North are putting up 10 percent of Greater Manchester's entire Green Belt loss, (discussed in detail later in this report) this raises serious questions of fairness over the disproportionate burden on these three towns.

It also raises fundamental questions about the purpose of the Greater Manchester Spatial Framework. If the whole point of the project is to address housing needs in Greater Manchester over the next 20 years, then the GMSF has singularly failed to do that.

13. Using the SHLAA to calculate the shortfall in building land over a 20-year period is fundamentally flawed

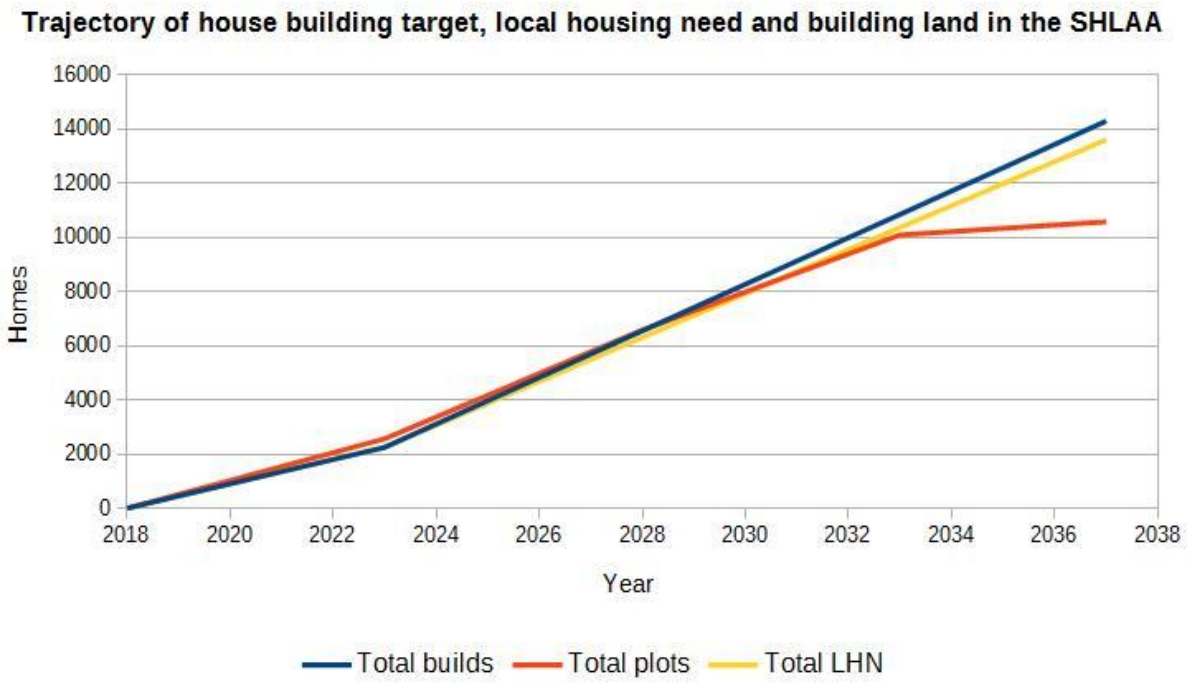
The reason being given for releasing land from the Green Belt is that Oldham MB (and Greater Manchester at large) will run out of building land over the course of the 19-year Spatial Framework. There appears to be no concrete evidence to support this claim, and it is our conclusion the GMSF is manufacturing a building land shortage by using a mathematical conjuring trick.

To take Oldham's case specifically, the GMSF has determined that there will be a shortage of 4,000 building plots over the course of the plan, which underpins the rationale for releasing land from the Green Belt. This number is specifically the shortfall between the number of plots Oldham needs to meet its target (15,137) and the amount of building land logged in the 2018 edition of the Strategic Housing Land Availability Assessment (11,130). The Strategic Housing Land Availability Assessment (SHLAA) is a document compiled by the council for the purpose of logging land available for building. The justification given by the Greater Manchester Spatial Framework for releasing land from the Green Belt is that there is not enough land in the SHLAA to cover the housing target (see *Greater Manchester's Plan for Homes, Jobs and the Environment*, p. 123).

Table 2: GM Housing Land Supply – trajectory

District	2018-2023	2023-2028	2028-2033	2033-2037	**Total 2018-2037**	Post-2037 identified supply
Bolton	3,257	6,881	3,469	1,016	**14,623**	0
Bury	1,692	2,411	488	105	**4,696**	0
Manchester	23,279	17,941	12,159	4,444	**57,823**	7,778
Oldham	2,700	4,229	3,694	507	**11,130**	75
Rochdale	3,815	4,432	1,022	-12	**9,257**	0
Salford	16,931	9,686	8,643	2,231	**37,491**	0
Stockport	3,649	3,542	2,950	1,633	**11,774**	200
Tameside	2,312	3,460	1,888	276	**7,936**	0
Trafford	4,239	5,281	2,804	1,037	**13,361**	0
Wigan	6,610	8,135	4,417	2,030	**21,192**	439
GM	68,484	65,998	41,534	13,267	**189,283**	8,492

Moreover, the SHLAA also provides a trajectory for when the land will become available for building. It is structured into 5-year spans i.e. 2018–2023, 2023–2028, 2028–2033, 2033–2037 and post-2037 (this can be viewed in the table above). By plotting the SHLAA trajectory (see *Housing* topic paper, Appendix A, p. 1) against Oldham's building target of 450 homes per year during 2018–2023 and 860 homes for the remainder of the plan (*Housing* topic paper, p.17–18) we can determine exactly at which point building land will run out in Oldham.



By plotting Oldham's target against the SHLAA trajectory, we see that the projected number of builds will exceed the land supply in 2028/2029, and will run into serious trouble in the 2033/2034 period. It is clear from the graph there will be a shortfall of circa 4,000 building plots by 2037. The GMSF puts forward a compelling argument for their case, but there is a fundamental flaw in their approach: **the SHLAA is not a fixed supply of land.**

The SHLAA is a dynamically evolving document, and as land drops off the books as it is built on, other land is added as it falls into disuse. Twenty years is a long time and plenty of land will become available over this period. It is entirely possible for the SHLAA to increase in size as well as decrease. The 2012 edition of Oldham's SHLAA only logged 9,118 plots, and rather than becoming depleted over the 6-year period between 2012 and 2018 the SHLAA actually increased in size to around 11,130 plots of land. Also over the 2012–2018 period, Oldham built 2,199 homes (*Monitoring Report 2017/2018*, p. 96). So, despite over 2,000 plots dropping off the SHLAA, Oldham's overall land availability has, in fact also increased by 2,000 plots during the same period.

To illustrate what is actually occurring, it is helpful to consider what would have happened if the Spatial Framework had been initiated in 2012 using that year's edition of the SHLAA. Over a similar 20-year timeframe (2012–2033) the 2012 DCLG household predictions projected that 13,877 new households would be formed (the overall household projections are reproduced here for convenience).

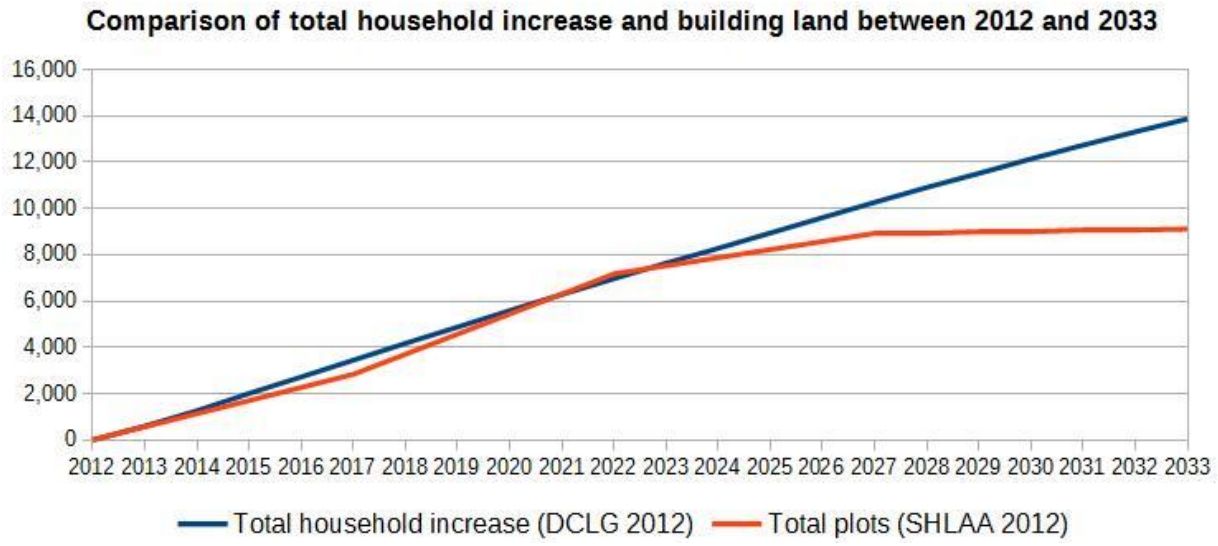
Household formation projections for Oldham MB (DCLG 2012)

Year	Households	Year	Households
2012	**90,365**	2023	**98,004**
2013	**90,958**	2024	**98,648**
2014	**91,630**	2025	**99,308**
2015	**92,374**	2026	**99,973**
2016	**93,088**	2027	**100,634**
2017	**93,812**	2028	**101,277**
2018	**94,537**	2029	**101,885**
2019	**95,242**	2030	**102,511**
2020	**95,958**	2031	**103,107**
2021	**96,654**	2032	**103,682**
2022	**97,332**	2033	**104,242**

Table 13 Potential Housing Land Supply by District Partnership

District Partnership	< 5 years	6 to 10 years	11 to 15 years	16+ years	Total	Total (%)
Chadderton	239	536	169	40	984	10.79
Shaw, Crompton and Royton	252	543	107	39	941	10.32
Failsworth and Hollinwood	166	497	286	17	966	10.59
West Oldham	1,081	1,529	345	0	2,955	32.41
East Oldham	580	1,072	614	0	2,266	24.85
Saddleworth and Lees	519	162	230	95	1,006	11.03
Total	2,837	4,339	1,751	191	9,118	

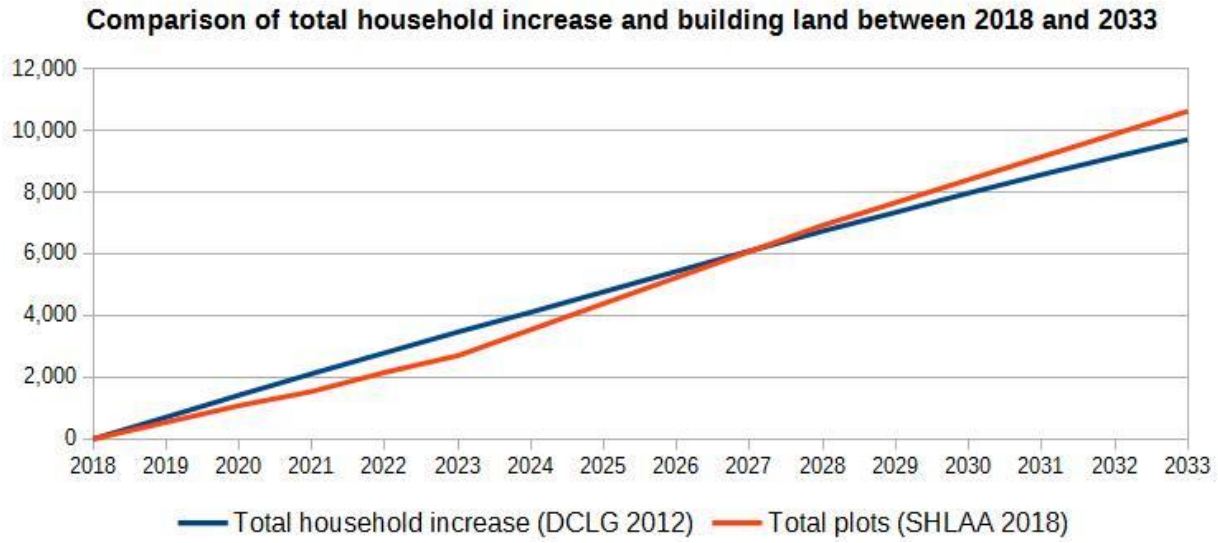
The 2012 SHLAA is broken down into four categories: plots that can be expected to deliver housing in 5 years or less, 6–10 years, 11–15 years, and finally 16+ years. By comparing the trajectory of 2012 SHLAA to the projected household increase we can see that building land was projected to run out in the 2022/2023 period. Over a 21-year timeframe (2012–2033) the shortfall would be around 4,759 plots. The SHLAA roughly covers housing need until 2022, and then it appears to lose steam. According to the graph, by 2027 there is a shortfall of over 1,702 homes, and by the end of the 21-year period in 2033 there is a shortfall of nearly 5,000 homes. Beyond this period, you can see that the gap only increases.



However, when the 2018 edition of the SHLAA was published the picture would have changed substantially. By plotting the SHLAA land trajectory against the 2012 household formation projections we see in the graph below 10,623 plots are estimated to be deliverable in the 2018–2033 period, leading to a land surplus of 918 plots over the remaining 2018–2033 period. So what is the net effect of all of this in our 2012 Spatial Framework? Let us recap what is happening:

1. The government's 2012 housing figures state that Oldham will need at least 13,877 houses over the 2012–2033 period.
2. The 2012 SHLAA has 9,118 building plots logged, creating a shortfall of 4,759 plots.
3. Over the 2012–2018 period Oldham delivers 2,199 new houses.
4. The updated 2018 SHLAA documents 11,130 sites and estimates a further 10,623 building plots can be delivered over the 2018–2033 period.
5. When these 10,623 plots are taken along with the 2,199 houses already built, that means there is now only a shortfall of 1,055 plots over the entire 21-year period, and NOT 4,759.

We see that there is originally a shortfall of 4,759 plots in the 2012 SHLAA, but this would have been reduced to just 1,055 for the 2012–2033 period once the 2018 SHLAA was published, as a result of more land becoming available.



So what exactly is going on? The shortfall in the SHLAA only occurs if you treat the SHLAA as a fixed supply that will run out, rather than a supply that is constantly replenished over a rolling 10–15 year period.

Conceptually, it is helpful to think of the SHLAA as a queue. An appropriate analogy would be doing your shopping: you go to Asda, fill your trolley and join the end of the check-out queue. There are maybe four or five people in front of you, and as they are gradually served other people join the queue behind you. All the time, the queue never exceeds half a dozen people, but maybe 100 people pass through the check-out through the course of the day. However, you don't need space for 100 people to queue. If the shop goes over to 24-hour opening then maybe 150 people will pass through the check-out over the course of the day, but the queue does not increase in size. So, the size of your queue has no bearing on the number of people your shop is able to serve, provided you can process your shoppers at the rate they check out.

Likewise, the number of plots in the SHLAA has no bearing on the total number of houses you can build provided there is enough plots to support the necessary building rate.

To return to what is happening in 2019, we see there is a strong parallel between the two SHLAAs: both the 2012 and 2018 editions of the SHLAA register enough land to support building over a 10-year period, but a 20-year period results in a shortfall of around 4,000–5,000 plots. There is an important reason for this: the SHLAA is only designed to supply land over a 10–15 year period (see paragraph 67 of NPPF). If you have a project that exceeds this timescale (as the GMSF does) then the SHLAA will not initially provide all the land that is required. It is very likely that the next edition of the SHLAA will push the "cliff edge" back even further, or at the very least greatly reduce the amount of land "shortage", just as the 2018 SHLAA did in the 2012 example.

The GMSF argues that the shortfall between the land required and the number of plots in the SHLAA means there is not enough building land in Oldham to service the 19-year plan and must

be supplemented by Green Belt land to supply Oldham's building needs. Clearly this is a fundamental flaw in how the building land shortage is being calculated. The GMSF is planning a 20-year project using a register that operates on a 10–15 year timescale. It has not proven that there will be a land shortage, it has engineered one itself.

By setting a timescale that is longer than the operational timespan of the SHLAA any building project can arbitrarily create a land "shortage". For example, the 2018 SHLAA predicts a surplus in 2028, a shortage of around 800 plots in 2033, and 4,000 plots in 2037. If the GMSF had set a timescale of 25 years instead of 19 years then the land "shortage" would be about 9,000 plots. By calculating a land shortage in this manner, Green Belt protection laws can be circumvented by simply extending the timescale of the plan.

There are only two possible conclusions we can draw from all of this:

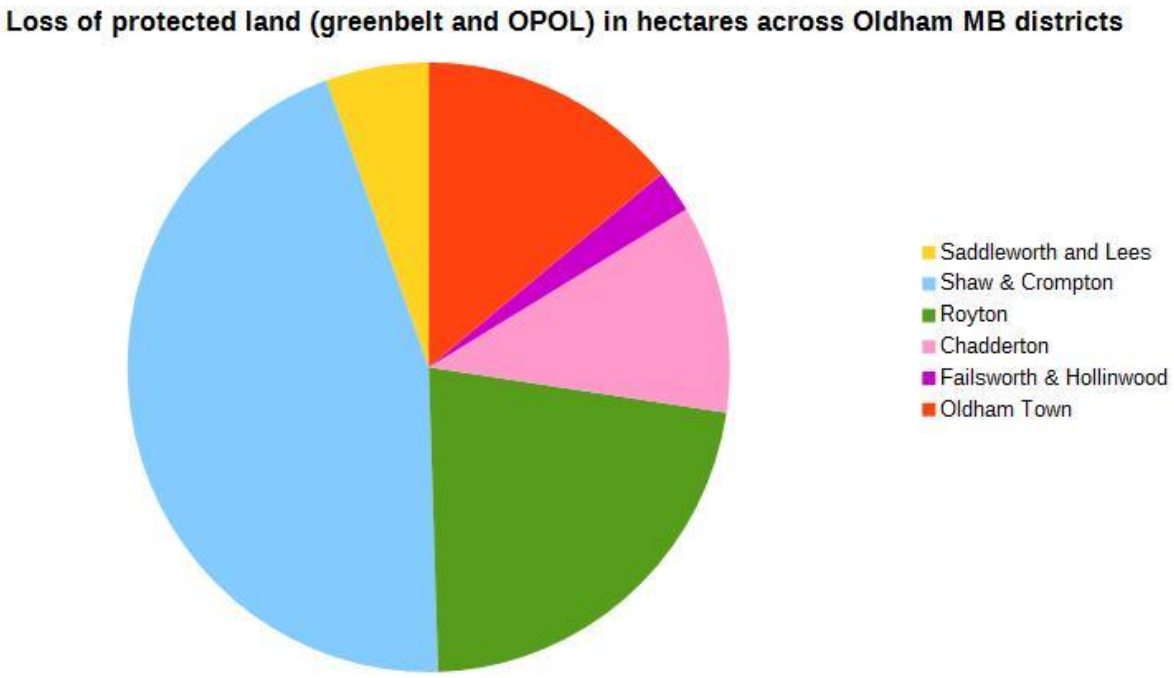
1. **The Green Belt release fails to meet the exceptional circumstances laid down in the National Planning Policy Framework (NPPF) because the GMSF has not proven that a building land shortage exists.**
2. **That exceptional circumstances have been met because the GMSF cannot guarantee there will be enough supply in the SHLAA.**

If the latter is true then this means that a loophole exists in the NPPF that can be exploited to annex building land from the Green Belt by arbitrarily setting a timescale on a plan that exceeds the current supply. Even though "exceptional circumstances" are not defined by the NPPF, normal comprehension of the English language would construe an "exceptional circumstance" to denote an unavoidable situation that is beyond the control of those at the mercy of it, not one that can be manipulated at will and not one that can be made completely avoidable by taking a more measured approach to planning and building. Considering that the NPPF requires such "exceptional circumstances" to be "fully evidenced and justified" it is impossible to envisage that Green Belt protection laws were designed to allow for Green Belt release under such a scenario.

On this basis we consider that there is clear and compelling evidence of a likelihood that as yet unidentified sites will come forward during the course of the plan period to meet needs. This 'windfall' development has not yet been identified specifically as a result of the design and timeframe of the SHLAA evidence used to arrive at potential supply, and the extended period in which the GMSF seeks to set housing policy. Consequently, the advice in paragraph 70 of NPPF should be applied and an allowance should be made for these windfalls.

14. Just five wards will account for one tenth of all the Green Belt loss in Greater Manchester

Across Oldham MB, 352 ha of Green Belt will be built on. Royton will lose 68 ha of Green Belt, but Shaw & Crompton is the worst hit, forfeiting 143 ha. After incorporating Saddleworth's 10 ha of Green Belt additions (Green Belt topic paper, p. 49–51), the net loss of Green Belt will be 342 ha across Oldham. All told, Royton, Shaw & Crompton and Chadderton North (44 ha) will lose 255 ha of Green Belt between them, accounting for approximately 75 percent of Oldham's Green Belt loss and over 10 percent of the Greater Manchester total.



On top of that, Royton and Shaw & Crompton will also lose 59 ha of Other Protected Open Land (OPOL) taking the total net loss of protected land across Royton to 91 ha, and 401 ha across Oldham.

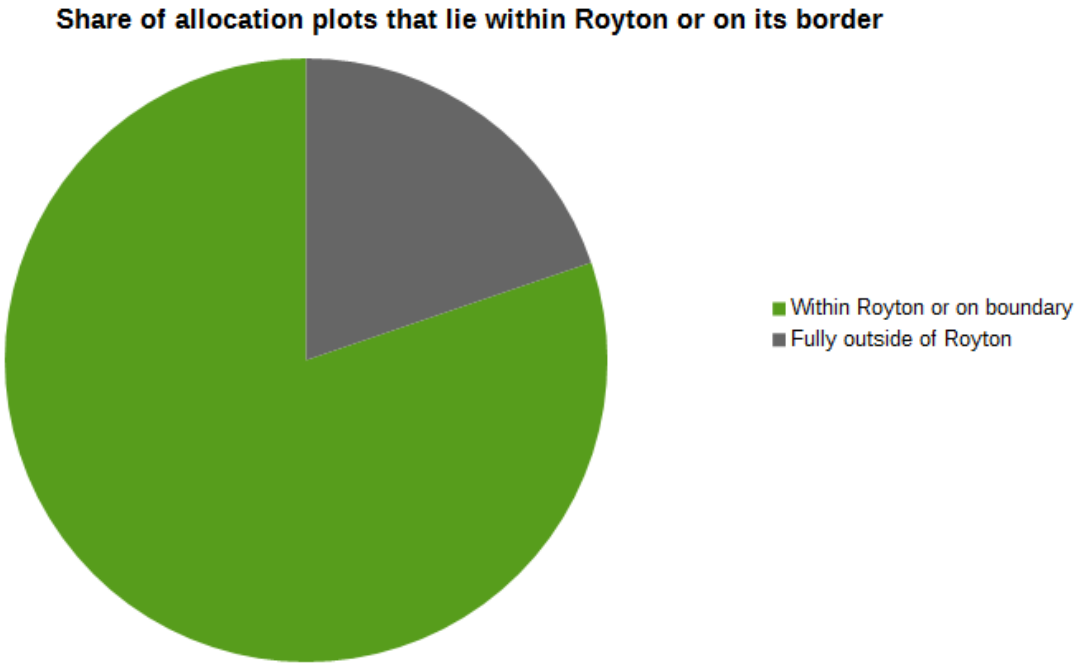
The widely publicised claim that "half of the Green Belt has been saved" while may be true at Metropolitan level, is not true in relation to Oldham MB. Oldham loses 342 ha in the 2019 draft compared to 434 ha in the 2016 draft—a saving of just 21 percent (Green Belt topic paper, p. 31).

Please bear in mind that the figures given at sub-borough level are not provided in the GMSF documentation so are only estimates obtained using the MappingGM measuring tool. It goes without saying that five contiguous council wards, constituting just three towns, forfeiting one tenth of all the Green Belt across the Greater Manchester region is grossly disproportionate.

15. Eighty percent of all the proposed building on Oldham's Green Belt would be in and around Royton.

The physical scale of land mass isn't the only important factor in analyzing the Green Belt allocations. The distribution of plot allocations is also an important consideration due to the impact on local infrastructure

By referring to the *Greater Manchester's Plan for Homes, Jobs and the Environment* (pp. 242–272) and OMBC's concept plans for Beal Valley, Broadbent Moss and Cowlishaw it is possible to determine precisely how many housing units are allocated to each ward. By considering the locality of the allocations, we see that Royton's allocations account for about one third of all the allocation plots in the borough.

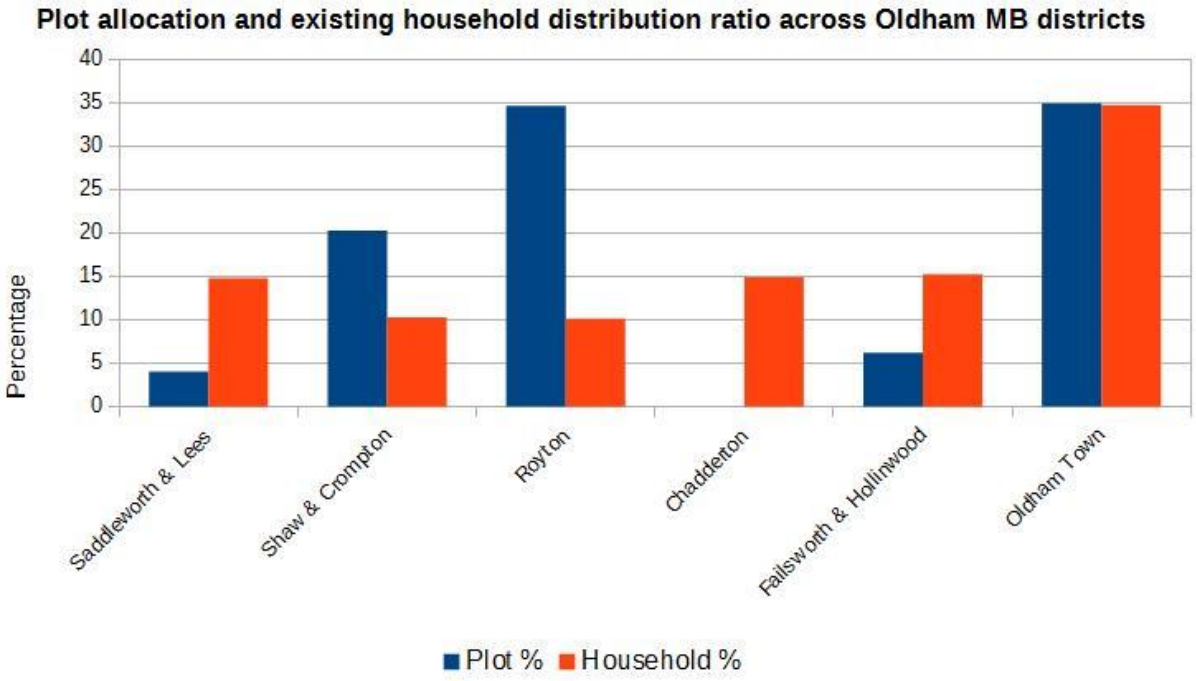


This doesn't tell the full story, however. Many of the allocations lie on the Royton border (such as Beal Valley, Broadbent Moss and Cowlishaw) which will invariably have an impact on Royton's infrastructure. In fact, by considering those allocations that transgress Royton's border along with those allocations within Royton we see they account for 3,250 of the 4,050 plots—80 percent of all of Oldham MB's Green Belt plots.

Obviously, the location of these new builds will have a significant effect on the local population size, which will in turn impact on local infrastructure and public services. The table below compares the proportion of allocation plots per district with the district household numbers as they stood at the 2011 census (p. 7).

Plot allocation and existing household distribution ratio

District	Plots	Plot %	Households	Household %
Saddleworth & Lees	170	4	13,262	15
Shaw & Crompton	852	20	9,205	10
Royton	1,454	35	9,098	10
Chadderton	0	0	13,358	15
Failsworth & Hollinwood	260	6	13,664	15
Oldham Town	1,468	35	31,115	35
Oldham MB	**4,204**	**100**	**89,703**	**100**

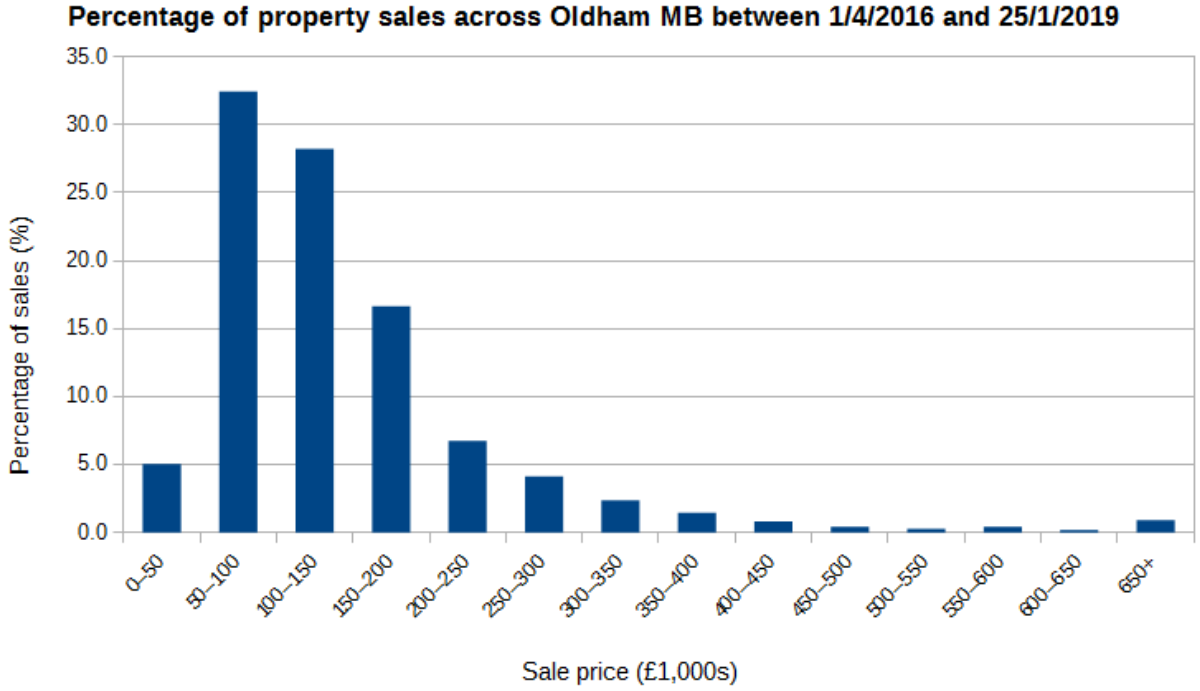


The distribution of plots is highly disproportionate when you take into account the existing household numbers, with Royton accounting for 35 percent of the total share of the plots but only 10 percent of all households across Oldham. This would increase Royton's population by approximately 16 percent over a relatively short period. It is extremely doubtful Royton could absorb such an expansion without a proportionate up-scaling in infrastructure and public services.

N.B. Chadderton's plots have been omitted because Chadderton Fold is part of the cross-border Stakehill development and it is not possible to isolate the development in this region.

16. Green Belt site selection is poorly matched to local incomes

It is apparent that the plans for building on this Hanging Chadder Green Belt site, proposes the construction of "high cost, low density housing" which we understand to mean houses that would sell for sums in excess of £350,000. We suspect site selection is developer led to maximise a fast turnover and realise large profits as opposed to building affordable housing for local people, on smaller Brownfield sites.



According to data obtained from the Land Registry, there were 8,183 property sales across Oldham MB between 1st April 2016 and 25th January 2019. The median sale price was £122,500 during this period, which is consistent with Oldham's average property price of £125,000 over 2017 (*Greater Manchester: Strategic Housing Market Assessment* , 2019; p. 116). A sale price of £350,000 would place a house in the 95th percentile for house values. Even if a quarter of the 4,000 houses built on the Green Belt were "affordable", that would still mean that 3,000 of the 14,000 houses would be unattainable for 95 percent of the local population. In other words, around 20–25 percent of the houses to be built in Oldham over the next two decades would be matched to the income levels of what currently amounts to about 5 percent of the population. Clearly, houses priced to this level, supplied in this quantity, are not being matched to local need.

17. The omission of Green Belt allocations from the totals in the evidence base is misleading

The way the GMSF is supposed to work is to evidence test Local Housing Need and set a target based on that. Apart from the numerous questionable methods that have been invoked to get us to this point, you still end up with a hard target. The collective targets amount to 200,980 home builds (*Greater Manchester's Plan for Homes, Jobs and the Environment*, p. 113), and the GMCA set a policy target of 201,000 builds. After setting these targets the land must be supplied for them which has resulted in the most controversial aspect of the GMSF: the release of Green Belt land. Green Belt plots have been allocated to top up the existing building land, in order to supply the targets. The table below demonstrates that in most cases the total land supply is approximately 6–7 percent above the overall target, once the Green Belt allocations are taken into account (*Greater Manchester's Plan for Homes, Jobs and the Environment*, p. 123). It is standard practice to provide a small buffer so there is nothing unusual at this stage.

Area	SHLAA	Allocations	Total plots	House target	Plot/Target %
Bolton	14,623	0	14,623	13,800	106
Bury	4,696	**5,355**	**10,051**	**9,470**	106
Manchester	57,823	24	57,847	54,530	106
Oldham	11,130	**4,007**	**15,137**	**14,290**	106
Rochdale	9,257	**3,627**	**12,884**	**12,160**	106
Salford	37,491	2,000	39,491	32,680	121
Stockport	11,774	3,700	15,474	14,520	107
Tameside	7,936	1,542	9,478	8,850	107
Trafford	13,361	7,111	20,472	19,280	106
Wigan	21,192	1,900	23,092	21,400	108
Greater Manchester	**189,283**	**29,266**	**218,549**	**200,980**	**109**

Now, here is the problematic part: these Green Belt allocations don't account for all the Green Belt releases. There are several cross-border developments that have houses scheduled that do not seem to service the target of either area. Two examples of this that affect Oldham MB are the Stakehill/Chadderton Fold (allocation 2) and Kingsway South (allocation 3) developments. Between them they will supply a further 1,600 homes that do not serve Oldham's 14,000 home-building target. Could they service Rochdale's target? This is difficult to assess, because Rochdale has two cross-border developments with Bury (allocation 1.1 at Heywood/Pilsworth and allocation 1.2 at Simister and Bowley), so it is not possible to isolate the development in Rochdale. However, since Bury has no further cross-border developments then it is feasible to consider the collective total of Oldham, Rochdale and Bury. The results are interesting to say the least. As you can see from the above table, the combined number of evidenced Green Belt allocations for Bury, Oldham and Rochdale collectively sum to 12,989. This is broadly consistent with the *Greater Manchester's Plan for Homes, Jobs and the Environment – Overview* document which puts the total number of allocations for Bury, Oldham and Rochdale at **13,100**. By referring to *Greater Manchester's Plan for Homes, Jobs and the Environment* (p. 195–289) it is possible to factor in the boundary plots that have been omitted from the above table.

Total number of greenbelt plots across Bury, Oldham and Rochdale

Allocation	Key	Plots
Heywood/Pilsworth	1.1	1,200
Simister and Bowley	1.2	2,700
Whitefield	1.3	600
Stakehill	2	900
Kingsway South	3	700
Elton Reservoir	7	3,500
Seedfield	8	140
Walshaw	9	1,250
Ashton Rd. Corridor	13	260
Beal Valley	14	480
Broadbent Moss	15	1,450
Cowlishaw	16	460
Hanging Chadder	17	260
Robert Fletchers	18	170
South of Rosary Rd.	19	60
Spinners way	20	50
Thornham Old Road	21	600
Woodhouses	22	260
Bamford/Norden	23	450
Castleton Sidings	24	125
Crimble Mill	25	250
Smithy Bridge	26	300
Newhey Quarry	27	250
Roch Valley	28	210
Trows Farm	29	360
Bury+Oldham+Rochdale		**16,985**

As you can see, the total number of allocations for Bury, Oldham and Rochdale comes to 16,985, substantially more than the 12,989 allocations in the evidenced table. That is almost 4,000 allocation plots more!

This is a complicated argument so to sum up the main points:

1. The cumulative Local Housing Need for Bury, Oldham & Rochdale is assessed at 34,922 homes.
2. The cumulative house-build target is 35,920 (in line with policy GM-H 1)
3. The land made available for building these houses is 38,072 plots, including 12,989 recorded Green Belt allocations.
4. The boundary developments (allocations 1.1, 1.2, 2 and 3) release enough undocumented extra Green Belt to build another 4,000 houses over the stated target for Bury, Oldham and Rochdale.

The GMSF certainly gives the appearance of underhand tactics here. No matter how flawed the housing targets are as they stand, the Green Belt allocations in the first table are evidenced to service them. But here we have 4,000 extra builds that are not evidenced, and not included in any cumulative total within the Greater Manchester Spatial Framework. The only way to get these figures is to read through a 400 page document and add them up yourself!

The Mayor of Greater Manchester and the GMCA have a serious question to answer on this point. Why have an extra 4,000 Green Belt home builds above the policy target been slipped in and kept "off the books"? In a public consultation the public have a right to full disclosure and not to be misled about the true scale of the building on the Green Belt.

18. The Sites at Hanging Chadder and Thornham Old Road do not adequately meet the GMSF Site Selection Criteria

1) The land locked Greenbelt and greenfield areas for the proposed sites have not been previously developed. Its current form being in existence for over 100 years. The land is not well served by any of the multi-mode sustainable transport options of the GMSF. Homes will solely rely on the motor vehicle. The site is not well connected to Royton and its services. The site is Green Belt. Community assets and use of Green Belt will be removed and on balance the sites will cause harm at the community level, pressures on existing infrastructure and increase flood risks.

2) The sites cannot take advantage of any of the key assets and opportunities proposed by the GMSF. Lack of access to Central Manchester, Media City, Manchester Airport Enterprise Zone or Leeds via sustainable transport puts the site at a material disadvantage to other locations across Greater Manchester. The key economic data and stubbornly low resident wages of OMBC are material in consideration. The ability of local communities' to affordably buy or rent one of the aspirational homes planned for Hanging Chadder and Thornham Old Road are material in consideration of the site selection any future planning applications. That development affordability and viability will be arrested due to costs of site preparation which developers will use to remove their obligations is of further consideration. This will result in developers legally able to remove themselves from affordable home provision. The site preparation costs will be prohibitive for social housing providers and public funds and will be prevented from preparing the sites for new homes due to costs.

3) The sites have no economic opportunities with capacity to deliver transformational change required other than via the motor vehicle. No infrastructure is proposed to affect or boost connectivity to Greater Manchester's opportunities. The sites do not deliver genuine inclusive growth or sustainable and affordable transport links. The sole use of the motor vehicle is neither sustainable nor complaint with the GMSF goals.

4) The sites are greater than 800 metres to the Royton, Rochdale or Oldham designated town centres', and are therefore not sustainably accessible.

5) The sites, both of which are land-locked will have no direct significant impact or urban regeneration due to the mature tenure of the existing community. In fact, the 100% urban creep in the case of Hanging Chadder will create harm and negative impacts well known and associated with urban creep and the first principles of Green Belt land creation and retention. No additional schools served by sustainable transport are proposed. No additional community services are proposed or health care provision.

6) No transport investment is planned or possible by developer or GMCA to serve the area. Access roads planned or traffic light systems onto Rochdale Road in the case of Hanging Chadder do not qualify or contribute to sustainable multi-mode transport. They place sole reliance on the motor vehicle and will place more capacity onto the road network and the

associated environmental impacts. Existing journey times and cost by bus and car to Central Manchester (in excess of 1hr 30minutes) are not sustainable nor do they deliver inclusive growth.

7) Neither site delivers any local benefits or address local problems or issues. Known issues of flooding, lack of transport options, capacity constraints of local health care and school services and congestion at peak hours will be further and negatively affected by the planned sites.

Summary

We recognise the important early stage of the consultation and the preparation of the GMSF. We seek to highlight the clear non-compliance of the two sites we have represented versus the published site selection criteria. We seek to highlight the material planning considerations both sites will face post GMSF framework. We seek to highlight the costs of preparing these land-locked and flood risk sites. We do this to avoid costs of public money wasted in the futile exercise to further include these sites. Our consultation and critical inputs at this early stage will be material considerations for both the Planning Inspector, Secretary of State and Local Government Ombudsmen in any future claims of maladministration at the OMBC Local Planning Authority level.

19. Summary

We have covered many points in our comprehensive dissection of the Greater Manchester Spatial Framework so we will briefly recap them here.

Given the disproportionate amount of development in the north of the borough, and especially the targeting of Royton that will see the town's population increase by 16 percent, our concerns over the impact on infrastructure and public services should be understandable. Our classrooms are already overcrowded, it takes weeks to get a doctor's appointment, the roads are gridlocked at peak hours and incidents of flooding are becoming more frequent. Perhaps the community would have been more receptive to some of the plans in the GMSF if it had outlined how these stresses would be alleviated, but it is fairly obvious that the impact on the present community did not factor into the thinking behind this proposal. It is easy to dismiss groups such as ours as "NIMBYs", but it is clear that this proposal was dreamt up and signed off by people who do not actually live here, so it is not unreasonable to ask who the NIMBY really is in a process such as this one.

The effect on wildlife in Royton will be particularly devastating. Development at this site will have a catastrophic impact on the biodiversity of this unique natural habitat. It is not possible to reconcile the devastation to be visited on the local wildlife with the Mayor's goal of a "greener Manchester". Royton certainly will not be greener if these proposals go ahead.

The lack of regard displayed by the GMSF for a purely evidence based approach is of particular concern to us. While we appreciate the outdated population growth projections were imposed on the GMSF by the Government, it is largely a red-herring. The GMSF seems to have disregarded the targets produced by the Government's Local Housing Need methodology anyway and have largely set their own targets for each borough that are not evidenced in any meaningful capacity and seem to fall far short of addressing the actual needs for affordable housing in those places. In Oldham's case the Local Housing Need figure was created by adding 10 percent to the overall household growth projection in line with Government methodology, but the GMSF then inexplicably added an extra 700 houses to the target without any justification. Stockport's target on the other hand falls short of the Local Housing Need target by 30 percent. Once you factor in that the nature of the development has clearly not been matched to local income levels, it is impossible to see how Greater Manchester's housing needs will be properly serviced over the next 20 years.

The problems with the evidence base are exacerbated by further obfuscation by the GMSF. As demonstrated by us in this document, using the SHLAA to calculate a building land shortage and present this as a case for releasing land from the Green Belt is deeply flawed. The evidence demonstrates compelling evidence of a supply of 'windfall' homes which need to be taken into account. On top of that we also have what seems to be a clear attempt to keep thousands of unevidenced cross border Green Belt developments "off the books" in Oldham, Rochdale and Bury. Even if this is a genuine oversight it clearly breaches the spirit of "full disclosure", which is supposed to be the guiding principle in a public consultation.

While the Green Belt offers many benefits to local residents its primary purpose is not actually to provide the locals with some nice scenery, it is a strategic tool with the specific goal of preventing urban sprawl. The whole purpose of the Green Belt is to prevent the kind of development being proposed in the GMSF i.e. the Greater Manchester Spatial Framework would be more aptly titled the Greater Manchester Urban Sprawl. Clearly, implementing something it was designed to prevent does not constitute an "exceptional circumstance" as laid out in the National Planning Policy Framework. It is not surprising the GMSF has turned into such a mess when it was founded on such a paradox.

Since we have spent considerable time telling you what we do not want, it is reasonable to ask what we do want. We propose a higher density town-centre based strategy that will make more optimal use of the available brownfield sites, with the added advantage of rejuvenating the local economy. Such an approach could conceivably reverse the trend of the declining high street if it had its own consumer base built into it, and also create a new "night life" industry which has all but vanished from Oldham in recent years. Modern living is geared to convenience and speed, and while nothing can compete with the click of a button in terms of convenience, when it comes to speed, internet shopping is still at the mercy of the geography, which factors into the economics of buying. The net effect of building on the Green Belt will be to take people out of the town which will exacerbate Oldham's economic problems. This is the exact opposite of what Oldham should be doing, unless Oldham's long-term goal is to simply become a suburb of Manchester.

As our Tandle Hill protest demonstrated, the GMSF clearly does not have the consent of the people of Royton. Nobody has expressed this more eloquently than Jim McMahon, MP for Oldham West and Royton, when he stated that the people of Oldham felt like this was being done to them rather than with them.

For all the above reasons, we strongly oppose your proposals and urge you to completely remove **Hanging Chadder GMA 17** from the GMSF.

Yours Sincerely

Noel Mahon
Chairman
For and on behalf of Save Royton's Green Belt Community Group.