

SAVE ROYTON'S GREENBELT



**RESPONSE TO THE GREATER MANCHESTER
SPATIAL FRAMEWORK
CONSULTATION ON THE DRAFT PLAN
2016/2017"**

References:

- **Hanging Chadder (Ref:28.8.10 OA10)**
 - **The East & West of the
A627M Tandle Hills (Ref:28.3.4 NG2)**
- **The Beal Valley (Ref:28.8.11 OA11)**



Saves Royton's Greenbelt



@SaveRoytonGbelt

SAVE ROYTON'S GREENBELT



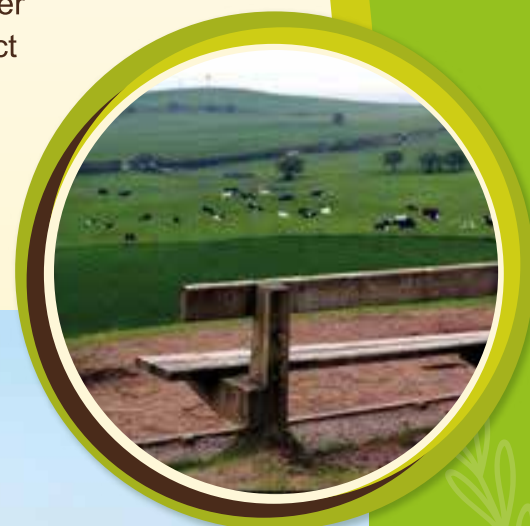
12th January 2017

RE: Draft GMSF 2016 Consultation:

The proposed use of Greenbelt land at Hanging Chadder (Ref:28.8.10 OA10) & The East & West of the A627M Tandle Hills (Ref:28.3.4 NG2) & The Beal Valley (Ref:28.8.11 OA11)

We are writing to respond to the consultation on the Draft Greater Manchester Spatial Framework. We represent a community group known as "Save Royton's Greenbelt" and currently have a membership of over **2100 local residents** and as such, these representations reflect the feelings and views of our membership.

We have outlined below the points that we would like to ensure are considered at this stage of the consultation process.



1. Our concerns about the proposed use of this Greenbelt land for the provision of housing and commercial development.

The proposed future use of all three of these sites is particularly ill-considered. They are all in the established greenbelt and these proposals go completely against The Greenbelt Policy.

Our members have real concerns about proposals in the Framework which earmark substantial areas of Green Belt land for large scale development. This represents a short-sighted approach, which threatens the future of these much-loved 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 areas of land. Such a plan could bring back to life empty and in some cases neglected former factory sites. 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.

Greenbelt Policy states that greenbelt land exists as an area that is kept in reserve for an open space. The main purpose of the Greenbelt Policy is to protect the land around larger urban centres from urban sprawl, and maintain the designated area for forestry and agriculture as well as to provide habitat to wildlife.

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 an access to clean air.

Areas that are designated as green belt must not be built upon because green belt is defined as an open space, other than certain buildings for agricultural uses and sanitation facilities, should be considered. Only in exceptional circumstances, can it be possible to change the use of land in greenbelt and gain permission for structures that are officially not allowed in 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 greenbelt and there is an existing suitable infrastructure to support the buildings.

Greenbelts 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 creating 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.”

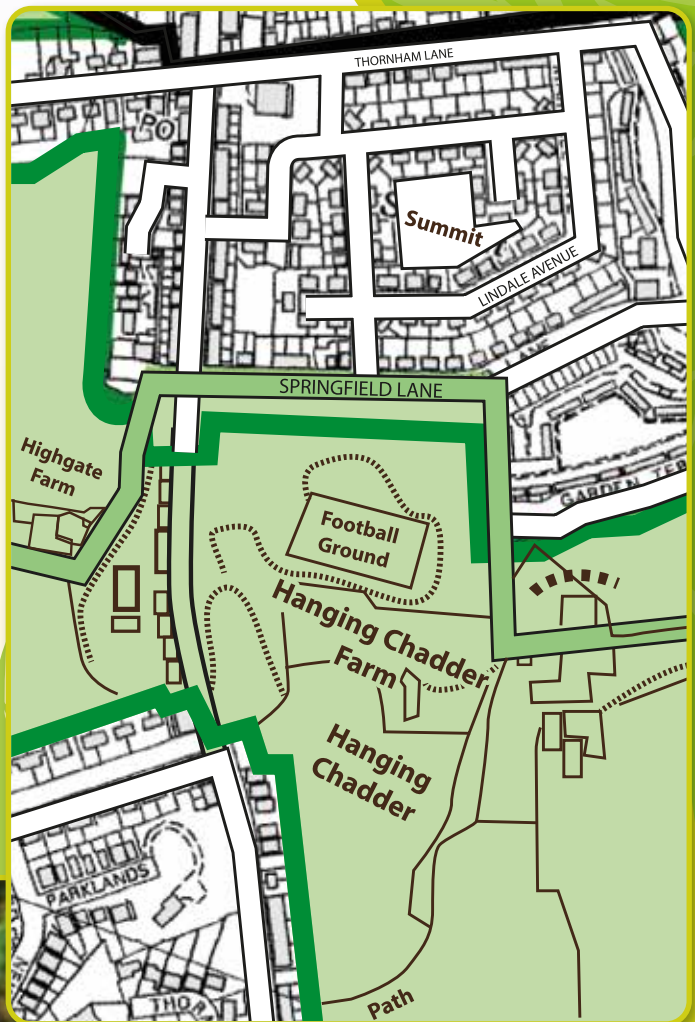
There are no exceptional circumstances to justify the draft GMSF proposals showing a clear disregard for Greenbelt Policy and the wellbeing of Royton’s existing and future residents.

The GMSF’s proposal to use Greenbelt land to provide over 30% of the total quota of these proposals is wholly unacceptable. There are many Brownfield sites in the region and derelict sites, old mill buildings and areas in need of regeneration that could be used.

More specifically, the proposed sites **Hanging Chadder (Ref:28.8.10 OA10) & The East & West of the A627M Tandle Hills (Ref:28.3.4 NG2) & The Beal Valley (Ref:28.8.11 OA11)** are particularly important to the local community of Royton and the Tandle Hills site is used by many people from all surrounding towns and tourists for recreation and as a break in the urban sprawl. Building here would diminish the striking views across the valleys into surrounding countryside and the proposed uses would introduce a level of noise and air pollution completely at odds with the Tandle Hills country park. The Hanging Chadder site provides a natural break and green space between two historic settlements and provides quality grazing land for a variety of animals used in food and dairy production. The Royton section of The Beal Valley greenbelt also acts as a division between communities and loss of this would inevitably lead to Urban Sprawl. They are all frequented by families, walking groups, school children for educational projects, nature lovers, dog walkers & horse-riders. 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 opposite.



Greenbelt spaces offer many benefits to people who live near them and visit them, to the places they are set in and to the nature that they host. They offer many benefits to local communities, to the local economy and for nature. These areas of land are important assets and I would urge the Combined Authority to think again on the proposals that could see us lose areas of Green Belt land in the Royton area.



2. Our concerns about future housing demand projections in the Greater Manchester Spatial Framework.

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.”

We also understand that the figures used for projecting the need for this future housing were calculated based on extrapolated Pre-Brexit figures.

It is also worthy of note that there are many large industrial buildings lying empty at the nearby Stakehill Industrial Park and at many other Industrial Parks in the local area. Kingsway Business Park, Rochdale currently has 767,000 square feet of empty units, Heywood Distribution Park has 1,253,729 square feet empty and Stakehill industrial Park has only 45% occupancy leaving 1,375,000 square feet empty. This demonstrates that there is clearly not the projected demand for more commercial buildings in this area.



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

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 is limited to infrequent and unreliable bus services despite a sizable existing population. There is no Metrolink or railway provision anywhere near to either **Hanging Chadder (Ref:28.8.10 OA10) & The East & West of the A627M Tandle Hills (Ref:28.3.4 NG2) & The Beal Valley (Ref:28.8.11 OA11)** proposed sites and access to the nearest motorway junctions is via the busy roads described above. These proposals would lead to a significant impact upon road safety due to the need to create new junctions onto already 'at capacity' roads.

In addition, the huge increase in traffic, noise and air pollution that these proposed developments would bring to the area, would have a detrimental effect on the well - being and general health of current and future Royton residents. With an average of two cars per proposed household, this could easily result in an additional 8600 cars between the three areas. Add to this the hundreds of heavy goods vehicles that would be expected to operate to and from the proposed industrial premises and the cars of workers employed on these sites. Road safety and pollution would undoubtedly be made worse by this huge increase in traffic.

TRANSPORT



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 the building of houses and commercial properties on the green spaces in Royton could also have an 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...”

More specifically, the main arterial route between the area that used to be served by Rochdale A&E department, which closed a couple of years ago, and Oldham Royal A&E department, which cuts straight through two of the proposed sites, **Hanging Chadder (Ref:28.8.10 OA10) & The East & West of the A627M Tandle Hills (Ref:28.3.4 NG2)**, already experiences a constant stream of Emergency Ambulances. Any further housing in these areas will undoubtedly lead to more traffic, potential patients and more ambulances. These factors would compound the already increased noise pollution and road safety issues.

AIR POLLUTION

NOISE POLLUTION

ROAD SAFETY



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 sites. This would apply especially on the proposed Hanging Chadder site with Rochdale Road, Garden Terrace, Castleton Road, Narrowgate Brow, Fir Lane, Eskdale Avenue and Grasmere Road already experiencing flooding issues from this elevated land.

The topography of the land on all three of the proposed Royton sites 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.

Furthermore, the removal of trees, shrubs and grassland to make room for these houses, commercial buildings and access roads would have a dramatic effect on the ecology of the area and make the surrounding land more unstable, risking landslip.



INFRASTRUCTURE



5. Our concerns about our already over stretched Health and Education 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 increased demand for school places and on GP practices in Royton. Whilst it would appear Royton is well served with schools; they are all at full capacity with primary and secondary schools already struggling to cater for the current population.



EDUCATION

&

HEALTH

Likewise, the local health services are all struggling to keep up with demand and it is common to expect a 7/10 day 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. All the A & E patients from neighbouring Rochdale that would originally have been taken to Rochdale A&E, now have to travel directly through Royton to the Oldham A&E. Ambulance response times are already a significant issue for this area. 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 the huge increase in population being proposed in this plan.

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, as a result, our GP services are starting to reach breaking point. This situation is not sustainable.

We believe that the GMSF fails to take into account the impact that sizeable developments could 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. Our Firm Belief is that that the GMSF should concentrate on Brownfield First.

It is apparent that the GMSF housing plans for two of the Royton sites **Hanging Chadder (Ref:28.8.10 OA10) & The East & West of the A627M Tandle Hills (Ref:28.3.4 NG2)**, propose the construction of “high quality housing” which we understand to be houses, in excess of £250,000 in value. The reasons for this are also apparent as these areas are both extremely sought after areas, due in no small part to the fact that the area has historically enjoyed an element of “greenbelt protection”. We believe this is the GMSF strategy to allow developers a fast turnover and large profits as opposed to building affordable housing on smaller Brownfield sites.

Our feelings are that increased emphasis should be placed on providing more affordable housing for our current and future generations on these brownfield sites.

However, whilst we would welcome plans to introduce more affordable housing to ensure local people are enabled to get on to the housing ladder, the need for affordable homes is not considered justification for removing these areas of land from the Green Belt. The NPPF 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.

The Conservative-led Government said that it wanted planning policy to make clear that unmet housing need does not justify the harm done to the Green Belt by inappropriate development.

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”.

BROWNFIELD FIRST

VERY SPECIAL 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. Rather than lose our green spaces forever, we should be focusing on regenerating our towns and cities and encouraging people to move to these areas.

The Campaign to Protect Rural England stated in September 2015 stated:

“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.”

BROWNFIELD FIRST



Given the large availability of brownfield land across Greater Manchester, we question the need to remove land from Royton's Green Belt. We share the concerns that have been raised by CPRE in their draft response to the GMSF. They make it clear that while the draft GMSF suggests a brownfield target of only 70% in the not so distant past, local authorities across Greater Manchester were expected by the Regional Spatial Strategy to achieve between 80% and 90%.

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. We firmly believe that a brownfield first approach is essential. 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 land and brownfield site owners have not been made aware enough of the opportunities to submit their sites to the GMSF for future development. We also 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 feel that developers are land banking these sites to ensure they realise maximum returns. We feel these developers should be forced to complete these developments before any future green spaces are considered.

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



CALL FOR SITES



7. We believe the GMSF proposals will damage the Ecology and Wildlife that currently thrives in Royton's Greenbelt.

There is a large concentration of **wildlife and ecology** that flourishes on all three of the proposed Royton Greenbelt sites that would be damaged irreparably if the developments were 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 three Greenbelt areas that we are concerned about are currently a haven for many species of birds, animals and creatures, many of them protected species.

ECOSYSTEMS



Commonplace in all three of Royton's Greenbelt areas are **Hérons, Crested Newts, Bluetits, Great Tits, Long Tailed Tits, Wagtails, Robins, Wrens, various Owls, Pheasant, Coots, Moorhens and Blackbirds**. The habitat these Royton Greenbelt areas also support **Badgers, Foxes, Stoats and Weasels, Hares, Roe Deer and Wood, Harvest & Field Mice. Kestrels and Buzzards** are often seen overhead and hunting in the fields. Wonderful green spaces packed with wildlife!

The Hanging Chadder (Ref:28.8.10 OA10) & The East & West of the A627M Tandle Hills (Ref:28.3.4 NG2) proposed sites in particular, play host to **Bats and Woodpeckers** in addition to a multitude of **Ducks and Canada Geese** who return year after year to breed, making use of the pond on Hanging Chadder and the Tyle Lodge on Thornham Old Road.

The Tyle Lodge also hosts a wide variety of fish species and is a well utilised and loved angling facility used by the Royton Community.

The Beal Valley (Ref:28.8.11 OA11) is an area with many hedgerows that provide an abundance of shelter, food and habitat for many species of creatures. It also plays host to the source of the River Beal and its waters provide a habitat to a wide variety of small fish which supports much associated wildlife.

GREAT CRESTED NEWT
PROTECTED



BATS
PROTECTED



All three Royton Greenbelt sites support **horse riding** and are equally popular with **dog walkers** and nature lovers. The adversity of **natural wildflower meadow flora** provides a constantly evolving colourful landscape throughout all four seasons of the year. These wildflower meadows are of **ecological importance** because they are open, sunny areas that attract and support flora and fauna that couldn't thrive in other conditions. They host a multitude of wildlife, providing areas for courtship displays, nesting, food gathering and shelter. These meadows support a wide array of wildflowers, including **Orchids, Bluebells, Daffodils, Violets and Pansies**, which makes them of utmost importance to insects like butterflies, bees and other pollinating insects, and hence important to the entire **ecosystem**.



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

A recent demonstration walk on Monday 2nd January this year, organised by our members in protest against the GMSF draft proposals saw a crowd well in excess of 3000 people walk past the **Hanging Chadder (Ref:28.8.10 OA10)** proposed site to the monument in Tandle Hills that overlooks the **The East & West of the A627M (Ref:28.3.4 NG2) site.**

The walk was supported and attended by five of our six Royton Councilors. The sixth Councillor supported our demonstration but was unable to attend on the day.

We have a Facebook site known as **“Save Royton’s Greenbelt”** which is rapidly growing in membership as more and more people learn of the proposals to develop on Royton’s greenbelt. This huge attendance echoes residents’ disgust at the potential loss of their “Open spaces”, they currently enjoy as a break in the urban sprawl.



SUMMARY

It is apparent that the existing local infrastructure in these areas identified is already at full capacity and, with these proposals making no provision to improve them, the 'strategic' justification fails. Not enough has been done to identify brownfield sites as an alternative to this important Greenbelt land. Identifying and utilising smaller brownfield sites would have a positive impact on areas in need of regeneration and the communities they are situated in.

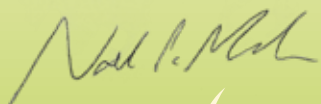
It would decontaminate the land, make the areas more attractive and have much less impact on the existing services, roads and general infrastructure, when shared out more evenly across a wider area. These large proposed developments would add far too much pressure to relatively small villages. The loss of the green spaces would also have a very negative effect on the wellbeing of the existing residents. In addition, the demand for Industrial buildings is clearly non-existent. Royton is being expected to take an unreasonable share of the burden of proposed developments, which should be wider spread wider across Oldham Borough and the rest of Greater Manchester. The proposed use of this Greenbelt land would potentially lead to urban sprawl and loss of green gaps between neighbouring towns which is very important for people's quality of life in densely built up areas like Royton.

Normally there must be 'exceptional circumstances' to allow building on green belt and even then, not on anywhere near the scale of these proposals. There are no 'very special circumstances' that would apply in this case to allow developers to disregard Royton's green belt and other open spaces and a justifiable case for harming the green belt cannot be made. The current proposals would damage the areas environment, wildlife and ecology beyond repair.

For all the above reasons, we strongly oppose your proposals and urge you to remove

- **Hanging Chadder (Ref:28.8.10 OA10)**
- **The East & West of the A627M Tandle Hills (Ref:28.3.4 NG2) &**
- **The Beal Valley (Ref:28.8.11 OA11) from the allocation.**

**Signed on behalf of
Save Royton's Greenbelt Community Group**



Noel Mahon



Gary Palmer

