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Submission to the Consultation on the GMSF

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Greater Manchester does require an updated, comprehensive and effective spatial framework. A spatial framework is necessary in its own right to determine where new development or redevelopment can take place and, as importantly, to determine where it may not take place. If no framework is in existence, developers have the capacity to challenge by appealing against any planning refusal. It is clear to me that doing this at the GM level is common sense as long as there is buy in at local level across the ten local authority areas.

Both Rochdale, in particular, and Greater Manchester, in general, need to build the high quality, and, importantly, environmentally sustainable, new homes to replace outdated stock as well as to house those already seeking homes and for the growth in the future which the city region can benefit from. But these new homes in Rochdale must offer a greater range of housing choice so that people from a wide variety of backgrounds and incomes can live their lives in Rochdale and find new choices as their circumstances change. In particular, there is still a need for larger family homes recognising existing larger families as well as high quality, affordable and social homes. Both Rochdale and GM need land for industrial, office and commercial development.

I welcome the ambition for the spatial framework to be more than a basis for controlling building, the ambition to set challenging aspirations for the quality of life for the people of GM. In that light we must recognise that this generation has the opportunity to deal with the legacy of our industrial past and to establish our goals for the future. If we look across the city region evidence of industrial despoliation is obvious. In the Pennines the erosion of the blanket peat bogs has damaged what is a precious carbon sink as well as the first natural defence against flooding further down the river courses. Our rivers, though greatly improved, still have some way to go in being transformed into the environmental assets we want them to be. Our industrial towns have too many brownfield sites which are difficult to use because of the damage of previous centuries. And our densely built towns lack easy access to local green space that enrich both the health and the life of local people. Biodiversity is challenged by human development and must be managed more intelligently in the future if we are to turn the tide and see increasing not ever decreasing biodiversity.

In that sense the spatial framework is the opportunity to bring together different but existing work streams. The floods in Rochdale and Littleborough on Boxing Day, 2016 still live in people's minds - development must be consistent with measures to inhibit flooding. GM has legitimate goals in terms of moving through a low carbon GM to a zero carbon city region. The need to improve, vastly and quickly, our air quality is measured in the significant damage to health we experience now, especially for our children. The last two examples show how important it is to integrate the GM transport

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strategy with the spatial framework.

Something that is clear to me is that central government has to be a credible partner in delivering the ambition of the spatial framework and work across central government silos in a way it has not historically done.

For example, to deliver housing, we need departments involving health, education, transport and environment all engaged. Without government commitment the full fruit of the GM ambition will be lost.

However, the most contentious area is going to be determining where we allow building to take place. In that light there are some fundamental issues that have to be got right both to persuade local people, to succeed at the inevitable public inquiry stage and to serve as a long term basis for permitting and controlling development.

The first of these concerns is the uncertainty around medium and long term demand for new homes and the consequent housing units Greater Manchester needs to plan around. The original 2014 Office for National Statistics national total was significantly reduced in the 2016 forecast. I note the Housing Minister's comments in his letter to Jim McMahon that "the revised National Planning Policy Framework introduced the standard method for assessing housing need.... the expectation is that the standard method is used to identify the minimum number of homes needed per year.... However, the standard method does not provide a target that must be planned for.... I must also advise that the use of the standard method is not mandatory."

Obviously all of this calls into question the planning numbers that the GM spatial framework is relying on. A reduced demand/need for housing over the next 25 years will make a material difference in the demand for land and importantly for the type of land needed.

This brings me on to the next critical issue which concerns the potential use of greenfield land as opposed to brownfield. Greenfield is often cheaper and quicker to develop and holds greater attraction for developers if there is little or inadequate control. However green space is a vital part of environmental upgrade, for biodiversity, for leisure and health. Most people would work on the understanding that any land policy would insist on brownfield first. Indeed the Housing Minister also stated in his letter, "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..., 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".

But a brownfield first policy has to be worked through in order to be delivered. Firstly the spatial framework needs to be able to sequence not simply the availability of land but the sequencing of its

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release. If greenfield land has to be in the framework for potential development, that should be released later and not at the beginning. In practice this may avoid it ever being used. Secondly central government has to show a commitment especially to the older industrial areas of the north in making finance available for remediation of brownfield sites which would be too difficult or expensive to develop without the necessary investment. Equally, local and central government must develop the partnership approach necessary to invest in our traditional town centres so as to reorder them as centres of community, including a commitment to housing renewal and the creation of urban green space.

Thirdly, any new development must be infrastructure ready at the point when new build is to begin. In practice this means government working with local government to ensure our Councils have the necessary powers to insist, where appropriate, that developers pay their fair share in providing the infrastructure needed to support sustainable communities. There are too many examples of development where developers walk away at profit whilst leaving the public sector to retrofit those things needed to make a reasonable way of life available and to ensure communities are stable, or worse, where those necessary features are simply not developed.

On this same theme, adequate transportation systems, both public and private, are often not there and the GM Transport Strategy has to work alongside, if not ahead, of the spatial framework in a way that was not properly evident in the 2016 spatial framework.

But infrastructure is much more than simply transport; it is about all those things that communities rely on, access to GP surgeries and access to hospitals, school and college places, local retail, and more. And, of course, if these are not already available when new people move into new homes, pressure is placed on existing families in existing homes.

In the Rochdale constituency there are four sites specified for potential development, Land at Smithy Bridge, Land in the Roch Valley, Newhey Quarry and Kingsway South. Each one of these sites is potentially or already controversial set against Green Belt policy, including a brownfield first approach, seemingly revised national guidance on numbers, and set against the inadequacy of the existing infrastructure to cope with increased housing numbers. The existing spatial framework still has some way to go before it can demonstrate that development in each of these areas is compatible with the tests I have outlined above and I do trust that these points can be registered and responded to. If not, it seems inevitable that there will be challenge at a future inquiry.

A handwritten signature in black ink that reads "Tony Lloyd".

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