

GMSF Consultation Submission

Cllr Zoë Kirk-Robinson, Bolton MBC (Westhoughton North & Chew Moor)

Dear Sir/Madam,

I am writing to lodge my concerns in opposition to the Greater Manchester Spatial Framework (GMSF) as it stands according to publicly-accessible documentation. My concerns fall into several broad categories, each of which I shall go through in turn.

Housing Needs

There is a definite need for an increase in housing to cope with the expansion of towns in Greater Manchester. However, the precise number of people coming into the area must be in question following the decision to leave the European Union. Given this sudden (and although expected by some, not expected by all) change, the current plans do not appear to take this fully into account when calculating the housing need for the future of the region.

Further to that, Bolton has an existing housing policy that is not only robust but is on course to deliver the amount of housing needed by the town and its surroundings; including in my own Ward of Westhoughton North and Chew Moor. While I believe this existing policy has been taken into account with Bolton Council's submission for the GMSF, the additional development sites proposed by developers takes Bolton's potential development sites well over the numbers to meet its actual housing needs.

Given all of the above, it is clear that the GMSF as it stands would allow for a serious risk of overdevelopment in the Bolton area and its surroundings. Moreover, there are currently around 5000 empty properties in Bolton and its surrounds; making the idea of further expansion over and above the current predicted need simply unjustifiable.

Public Opinion

It's no secret that the general public are against the plans submitted to public consultation. A great number of local campaign groups have sprung up to fight the GMSF proposals. Public opinion sees this plan as a "developer's charter" that allows for the wholesale destruction of both our communities and our green belt. Given that there is a severe concern of overdevelopment in certain areas, Westhoughton included (although it is by no means limited to our area) I find it impossible to agree with the proposals in this framework.

The people of Westhoughton still remember the attempt by Manchester to build homes for 20,000 people in Westhoughton as an "overspill" area. They see the proposals to destroy vast swathes of their green belt space as another attempt at a Manchester Overspill. While there are existing, workable plans that cater for Westhoughton's natural expansion, it will be impossible to convince residents that the GMSF is a workable project that will not destroy their way of life; and I'm inclined to agree with public opinion on this.

Infrastructure

The local road system in Westhoughton and Chew Moor is overwhelmed already. During the 2015 consultation for the development of homes at Roscoe's Farm in Westhoughton, it emerged that the main roads around the centre of Westhoughton (specifically the Market Street, Bolton Road, etc area) there was capacity for approximately 400 more cars before the roads would be overloaded. The Roscoe's Farm application passed, and took up most of that 400 car capacity.

Developments are currently under appeal at Chequerbent, also in the Westhoughton North and Chew Moor Ward. These developments would see an extra 1,200 houses added to the Westhoughton housing stock and with them, over 1000 more cars. This puts us well over the capacity of the road network.

Put simply, the road network cannot cope with the influx of vehicles the GMSF would bring. Westhoughton requires substantial investment in new major roads and transport systems before further large-scale development can be considered. If the GMSF is allowed, there is a significant risk that piecemeal development will add houses at numbers that are just under the level that would trigger the need to build extensions to the main road network; thus overburdening the road network further and providing no relief.

Given the state of our road network, I cannot accept that the level of development proposed by the GMSF is acceptable at this stage. The number of major roads must be increased before we can consider large-scale housing development; otherwise there will be traffic chaos.

Public Services

In a similar fashion to the roads problem, our public services are at capacity. Police coverage; fire and rescue service availability; GP surgeries' capacity; and dentists availability are already at or below the level where they can cope with the current number of residents in the area. At each public meeting, we are presented by complaints that the public must be "ill on appointment" while calls to 101 go into a queue that can take up to half an hour to be answered. There is no end to these problems in sight.

With public services already stretched, I see no way of justifying further housing expansion on the scale proposed by the GMSF without significant investment in public services. If such investment is provided, public services must be improved *before* any further house building is permitted.

Schools

Schools in the Bolton area are at capacity and the increased need for places caused by a large-scale building project such as that required to implement the GMSF would require a number of new schools to be built. At the recent planning committee debate over the Bowlands Hey development application, Westhoughton South Councillors noted that there is only 1 school in Westhoughton that had space to take more children; and it was 3 miles from the proposed Bowlands Hey development. Young children should not be expected to travel that far to school.

With so few school places available, any new building plan must include a strategy for providing a comprehensive education plan for the children expected to live in the new houses. I am not convinced that the GMSF does this, and thus I cannot back it on those grounds.

Ecology

The GMSF allocates vast swathes of green belt land, especially in the Westhoughton and Chew Moor areas. This in itself is a problem because it permanently removes green space from the Greater Manchester area, but that isn't the limit of the damage.

Greater Manchester, with particular emphasis on Bolton, Westhoughton and their neighbouring areas in this regard, are home to a number of protected species, including: Badgers, Great Crested Newts, Water Voles, Common Spotted Orchids, Northern Marsh Orchids, Noctule Bats, Brown Long-eared Bats, Stoats, Roe Deer, Fallow Deer, Kestrels, Sparrow Hawks, Green Woodpeckers, Long-tailed Tits, and multiple varieties of Owl.

This is not an exhaustive list, it's simply a list of species spotted on or in the immediate vicinity of four sites in Westhoughton that were proposed for development in the last 18 months: Roscoe's Farm, Lee Hall/Chequerbent, Bowland's Hey, and Dixon Street. Of those four sites, two applications were turned down partly because of the damage they would inflict on the local wildlife corridor; while another is still awaiting a decision.

If the damage was too great then, why would it suddenly become acceptable now? In my view, it does not. The damage to the protected species in the area would be too great even in the face of increased housing demands.

As a result of the damage to the wildlife corridor, the damage to the green and protected open spaces, and the destruction of local protected species habitats, I cannot see a way to justify the proposals under the GMSF as it stands.

Power, Water and Sewage

Recent development proposals under existing housing plans have highlighted two significant problems that must be addressed before any further housing development could reasonably be considered: the capacity of existing sewer systems, and the significant flood risk.

Examination of the recent Dixon Street application in Westhoughton, which is still awaiting a planning decision, showed a potential sewer capacity issue for that development. It also highlighted a serious flood risk that necessitates further drainage surveys before a proper decision can be made on that application. This application is not alone. The Lee Hall application in 2016 highlighted increased flood risks in the area due to the proposed development.

The Lee Hall application also highlighted the need for more power generators. Over the Christmas period, several streets in Westhoughton faced “brown outs” due to a lack of sufficient power. An application, which was refused, to build more generators off Manchester Road, Westhoughton demonstrates that this need for additional power generation is known and accepted.

Building more power generators means further damage to the local environment over and above the damage that will be caused by houses and streets; since power generators are inherently polluting structures. This increases the environmental damage and makes these developments even less justifiable in this area at this time.

Archaeology

Westhoughton is home to prehistoric sites of archaeological significance, which have yet to be fully explored. The Lee Hall application contained reports demonstrating the existence of Roman and pre-Roman structures on this site; as well as Elizabethan-era buildings such as pottery manufacturing.

At Bowlands Hey recent digs for the housing application there have discovered evidence of a Neolithic settlement, which may turn out to be the original *West Howfen* settlement. Ancient peat bogs located on Bowlands Hey and the discovery of ancient birch tree pieces adds credence to this being the possible site of the original *West Howfen*; as they significantly increase the likelihood that this is where the original roundhouses with peat-burning fires would have been located.

Neolithic sites are exceptionally rare in the North West, due to the Ice Age climate at the time being mostly inhospitable. Obviously this makes Bowlands Hey an immensely valuable site, not just in terms of local heritage but national historical significance.

Under the circumstances, I must not only request that it be removed from the GMSF's list of development sites but *permanently* removed from development lists until the archaeological significance of the site is fully investigated.

With regard to Lee Hall, the Roman and pre-Roman archaeology found there is significant enough that further digs, to determine exactly what is there and how valuable to the historical record, should be undertaken before any decision on whether development should be allowed there can be taken.

In conclusion

While I understand the need for a robust housing plan for the future of Greater Manchester and appreciate the need to make this plan as enticing as possible for developers, I believe the current

plan does not suit the needs of Greater Manchester's residents; with residents in my own Ward of Westhoughton North and Chew Moor being particularly hard done to under these plans.

Moreover, there is significant threat of irreparable damage to wildlife; the green belt; and the archaeological record from the GMSF. There is inadequate provision for roads, schools, GP's surgeries, drainage, power generation, dentists, police cover and fire cover in the framework.

As a result, I must request that the current plans be rejected and a new plan be submitted for consultation before any further progress is made on this matter. I cannot support the GMSF as it stands, and nor can the residents I represent.

Yours faithfully,

Cllr Zoë Kirk-Robinson,
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