



**The Greater Manchester  
Places for Everyone  
Consultation Team**

**By email**

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**Councillor Howard Sykes MBE**

Our ref: HDS/KR/4651

Date: 30 September 2021

Dear PfE Team,

**Re: Oldham Council Liberal Democrat Group - Response to the  
Greater Manchester Places for Everyone Consultation 2021**

The Oldham Council Liberal Democrat Main Opposition Group, comprising of eight elected members, representing the Crompton, Shaw and Saddleworth West and Lees Wards of the Oldham Metropolitan Borough Council, wish to make this collective submission in response to the consultation on the Greater Manchester Places for Everyone Proposals 2021.

In summary, our view is that housing development should **only** take place on brownfield sites, by bringing back into use empty houses, or by repurposing redundant commercial buildings (such as mills and office blocks) as housing; that all Green Belt and OPOL (Other Protected Open Land) should be kept free from development; and that the Places for Everyone proposals unjustly impose a disproportionate additional housing burden in the Oldham Borough upon the residents of just two wards, Crompton and Shaw.

In the Introduction to Places for Everyone, it categorically states (paragraph 1.36, page 13) that: 'A key objective of the Places for Everyone Plan is to meet our Local Housing Need – using the Government's standard methodology this equates to almost 165,000 homes over the plan period (2021-2037). Government has been very clear that deviation from the standard methodology can only be justified in 'exceptional circumstances'. No exceptional circumstances have been identified to justify deviation from the standard methodology in this Plan.'

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We are delighted that the lower figure of 165,000 based on 2016 projections has now been adopted, rather than the original figure of 213,000 new homes generated from 2012 projections. However, the Liberal Democrats remain unconvinced that deviation from this revised figure generated by the 'standard methodology' to a still lower figure that reflects the local land constraints that would result from preserving Green Belt and OPOL is proscribed; for recent government pronouncements suggest otherwise.

In a response to claims made in the Times newspaper on 25 May 2021 by the Campaign to Protect Rural England that there is a legal requirement to meet the new house building targets, the Ministry of Housing, Communities and Local Government stated (and I quote):

- This is 'deliberately misleading'.
- To compare housing delivery in different parts of the country based on Local Housing Need formula is to misunderstand the nature and purpose of these numbers.
- That's not how they work – the numbers mentioned are a starting point for local councils to help them understand how much housing is needed in their area and are not legally binding.
- Put simply, it is a measure of an area's housing need, against which councils must then consider their local circumstances and supply pipeline.
- Councils draw up a local housing target, taking into account factors including land availability and environmental constraints such as Green Belt
- Green Belt decisions will remain with councils and communities.
- Protecting the Green Belt is a priority and our national planning policy reinforces regenerating previously developed land, known as brownfield sites, and prioritising urban areas.

The four Political Group Leaders at Stockport Council, an authority which chose to withdraw from the Greater Manchester Spatial Framework and go it alone, wrote to the Ministry to confirm that this was in fact the Ministry position.

In the written response they received, dated 13 July 2021, it clearly stated (and again I quote):

- Local housing need does not set a target for the number of homes to be built.
- Local planning authorities take into account land supply considerations and environmental constraints before determining the number of homes likely to be delivered in the area.
- This recognises that not everywhere will be able to meet their full housing need and depends on local individual circumstances.

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In the Government's housing white paper, Fixing our Broken Housing Market, published in February 2017 it states that, whilst expecting local authorities to establish their 'objectively assessed need' for new housing, that the government is committed to 'maintain existing strong protections for the Green Belt, and that Green Belt boundaries should be amended only *in exceptional circumstances*'.

The Government's policy on protection for the green belt is clearly set out in chapter 13 of the National Planning Policy Framework (Paragraph 137, Page 41). 'The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land **permanently open**; the essential characteristics of Green Belts are their openness and **their permanence**.'

In summary then, the position as we understand it can be summarised thus:

- The figures are **not** legally binding.
- They are an assessment of housing need **not** a target.
- Local Councils can draw up their **own** housing target based on local circumstances and can take account of the constraints of land supply.
- Protecting the permanence of the Green Belt is a national priority.
- Development should focus on Brownfield sites and renewal (i.e. repurposing redundant buildings or land) and prioritising urban areas where there is infrastructure.

We believe that this fully vindicates our own position, which has been consistent in our past responses to consultations upon the various iterations of the Greater Manchester Spatial Framework and is again stated now.

Brownfield sites and sites with existing planning permission for housing should first be built out as housing; and empty homes brought back into use and redundant retail, leisure, industrial and other commercial buildings repurposed as housing, or their sites cleared for new build.

It is the belief of the Oldham Liberal Democrat Group that **ANY** housing development on Green Belt or OPOL sites is **completely unacceptable**, and that the sites earmarked for housing on Green Belt or OPOL be removed from the Places for Everyone plan.

Instead, consideration should be given to increasing the housing density of town and city centre developments, where supported by infrastructure, to make up any resultant shortfall.

The Mayor of Greater Manchester Andy Burnham stated in his Foreword to the 2019 GMSF that he was committed to 'a brownfield-first approach to the release of sites for development', and Places for Everyone contains clearly stated commitments to retaining

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Green Belt and OPOL sites, and an overall reduction in the number of such sites proposed for redevelopment, which we welcome.

In the Introduction to Places for Everyone it states (Paragraph 1.14, Page 9): 'And one of the biggest lessons of the pandemic is the importance of good quality greenspace close to where people live. This is particularly important in our densely populated and deprived neighbourhoods. Urban greenspace is under pressure and needs to be protected and enhanced wherever possible.'

And 'The Places for Everyone Plan reinforces our ambition to bring forward brownfield land, it reduces the net loss of Green Belt further from previous versions of the GMSF by reducing the number of sites being allocated...and provides stronger protection for our important environmental assets' (Paragraph 1.28, Page 11).

And 'By working together we have been able to direct development to the most sustainable areas – primarily the city and town centres – and enable most efficient use of our brownfield land supply.' (Paragraph 1.37, Page 13)

However, this simply does not go far enough, for the Places for Everyone plan still places wholly disproportionate, punitive, and unreasonable demands upon the Green Belt and OPOL sites in the Crompton and Shaw Wards represented by Liberal Democrat Councillors (with open land in these wards and adjoining them at Heyside being decimated as a result).

Places for Everyone assumes delivery of 12,800 new homes in Oldham by 2037, based on the government's figures. Of these, under the latest plan, the proposal is to build 2,390 new homes on the Beal Valley (480) (JP Allocation 12), Broadbent Moss (1,450) (JP Allocation 14) and at Cowlshaw (460) (JP Allocation 16); almost one fifth of the total in only two out of twenty electoral wards.

In our view this represents **a massive and inequitable land grab** in Crompton, Shaw and Heyside, with the devastation of our local Green Belt and OPOL when most of the other Green Belt and OPOL sites elsewhere in the Oldham borough have now been spared or reduced in size such that the remaining few sites (at Chew Valley Brook, Coal Pit Lane and Rosary Road) only deliver 355 new homes.

Furthermore, this fails to convey the full housing burden being placed upon the people of Shaw and Crompton. For in addition to the demands of the Places for Everyone plan, there are plans to redevelop the former Shop Direct distribution centre site with over 400 new homes, a proposal to develop 55 homes on land south of Denbigh Drive, and currently a development being built out for 65 homes on a former steel-stockholding site in the town centre. In the longer-term there is also an under-detailed proposal to build

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out land on the boundary of Shaw and Crompton, towards the Kingsway Business Park, for homes and industry in the future.

The real fear of local people and local Ward Members is that the additional demands these thousands of new residents will place will simply overwhelm our already creaking local infrastructure, which is inadequate even for our existing population. We have primary schools that are already overcrowded and full; a dilapidated Health Centre that is near cardiac arrest; no swimming facilities or dry leisure provision; minimal youth facilities and no municipal tip.

The residents of an additional 3,000 homes will need more primary and secondary school places; more GPs and dentists; better youth, leisure and shopping facilities; new roads to drive on and better public transport.

And Oldham Council's decision to close and not replace the Crompton Pool and Gym now looks a little short-sighted given the number of new young residents that will need to learn to swim and the number of adults that will want to keep fit.

The Places for Everyone plan does not appear to adequately allocate further funding to deliver on these requirements.

We also challenge the suitability of any of the proposed sites for development in Shaw and Crompton.

All the sites identified are devoid of good vehicular access and there is no obvious way to make the necessary improvements.

Cowlshaw has no acceptable roads leading into the proposed site. The topography around the Whitfield farm area makes it difficult to envisage an elegant solution to site access. Similarly, the Beal Valley site is currently ill-served only by a narrow road.

The car park at Shaw and Crompton Metrolink is already at capacity and more space is urgently needed here, so we welcome the proposal to develop a new Metrolink stop at Cop Lane and would urge consideration for developing other stops elsewhere on the Rochdale – Oldham Metrolink line (for example, at Dunwood Park) to improve accessibility.

The designated sites are notably attractive open spaces that provide pleasure, relaxation, and health benefits to residents and visitors. The sites include public footpaths enjoyed by many dog-walkers, ramblers, and walking groups. Many of the Public Rights of Way are integral to the historic Shaw and Crompton Beating of the Bounds walk and Crompton Circuit walks. These locations also provide one of the few opportunities for people to

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undertake horse riding in safety which is particularly valued by young and inexperienced riders.

These sites are further enhanced by a diverse range of flora and fauna and importantly provide those 'green lung' areas which minimise urban sprawl between built up conurbations.

Two of the sites include small but nevertheless important rivers within their boundaries; the Rivers Irk and Beal (Cowlshaw and Beal Valley respectively) help to prevent flooding and are attractive features of the two sites.

Additionally, the Cowlshaw site is renowned for its numerous local springs and is given to serious flooding. The area has deep unstable subsoil that will require significant pilings leading to excessive construction costs.

Cowlshaw and Beal Valley also contain Sites of Biological Importance and these must be retained.

We also wish to make some generic comments relating to the cost of remediating brownfield sites and the investment in transport infrastructure required to deliver Places for Everyone.

We welcomed the publication by Oldham Council of its Brownfield Register and would urge elected members and the public to submit suggestions for additional potential brownfield sites, and unoccupied and empty buildings with the potential for conversion, for consideration as redevelopment sites.

However, one practical issue inhibiting the development of brownfield sites and the conversion of former industrial premises for housing is the cost of remediation. In Oldham, many such sites suffer from significant below-ground contamination or in the case of a building a contaminated infrastructure, the result of previous industrial use as a cotton mill; chemical and coal gas plant; coal mine; or dye works.

Decontaminating such sites is very expensive and this cost is a significant disincentive to local authorities and to housing developers as it can make housing developments unaffordable.

According to Department of Trade figures, the UK has approximately 1,000,000 acres of contaminated land, much of it in Northern towns, like Oldham, a legacy of their prominence as world leaders in the Industrial Revolution. As the estimated average cost of cleaning up contaminated land is £250,000 per acre, expenditure of £250 billion would be required.

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Compared to this challenge, the amount of Government funding available to address remediation is wholly inadequate. Although there is a £2.3 billion Housing Infrastructure Fund, only a small part of this money will be made available for remediation and the Government made only a miniscule £45 million available for land remediation under the new Land Release Fund.

Even if the Housing Infrastructure and Land Release Funds were made available at these same rates and every penny was set aside every year solely for remediation, **it would take over 100 years to make all brownfield sites across the country free of contamination.**

Accordingly, the Oldham Liberal Democrat Group feels that it is imperative that the Mayor of Greater Manchester and the ten local authority leaders join with local MPs, housing developers and social landlords to lobby government to significant increase the derisory sums currently made available by central government to address remediation. Without more money we feel that the government's stated aspiration to ensure that brownfield sites make the 'maximum contribution' will prove to be a baseless and hollow claim.

Places for Everyone identifies the need for a very significant investment in transport infrastructure. Improved transport is a critical obstacle to be overcome to ensure the success of the plan. Many of the strategic allocations are sited near our motorway corridors, ostensibly to take advantage of existing networks.

However, our existing motorways are frequently constrained by high levels of congestion resulting in unacceptable journey times and additional traffic jams on feeder and local roads. The projected growth of industrial warehousing, office space and new homes will require monumental investment in transport infrastructure. It is of paramount importance to ensure that the transport infrastructure is in place before other building takes place.

In conclusion then, the Oldham Liberal Democrat Group advocates that:

- The Green Belt and open spaces within Oldham are areas of pleasant natural beauty that make us unique in Greater Manchester, and that the protection of such sites from development should be absolute and permanent to preserve them for public recreation and enjoyment.
- The delivery of Places for Everyone should be constrained by recognising that Green Belt and OPOL is inviolate in line with government policy and public wishes.
- Housing and new businesses should only be developed on brownfield sites or sites with existing planning permission or through bringing empty homes back

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into use or repurposing retail, leisure and other commercial buildings as housing or demolishing them to create development sites.

- Housing should only be developed after the necessary local infrastructure is in place.
- The Places for Everyone plan places a wholly disproportionate and unjust burden for hosting new housing upon the people of Crompton and Shaw, that it will irrevocably destroy large swathes of local Green Belt and OPOL and valued nature reserves and overwhelm local infrastructure to the detriment of the existing community, and that the Oldham plan should remove all Green Belt and OPOL sites, and instead focus upon delivering more housing in the Oldham town centre.
- The Mayor of Greater Manchester and the ten leaders of the Greater Manchester authorities should continue to lobby central government for significant further funding to remediate more Brownfield sites for housing and business development. and further funding to support infrastructure improvements in education, health and leisure facilities and for transport improvements.

Thank you for considering these comments as part of the consultation.

We look forward to reading the findings in due course.

Yours sincerely,



Howard Sykes

Your privacy is important to me. Your local Liberal Democrat Councillors are committed to ensuring that we are transparent about ways in which we use your personal information and who we share that with (e.g. other Councillors, Council Officers or Officers from other bodies like the NHS, Police, Transport, United Utilities, Environmental Agency etc.) to help resolve any issues you have. The Liberal Democrats will also keep in touch from time to time about issues, but you can always ask us to stop at any time.

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