

Introduction

This document includes a summary of all the points made in response to the consultation, however they were submitted. The comments are listed as statements of point-of-view, and should not necessarily be interpreted as statements of fact. These are the views of respondents, not the Greater Manchester Combined Authority (GMCA) or other Greater Manchester (GM) local authorities. Where comments from a number of people/organisations are essentially the same point, they have only been included once. Many of the points were made by a large number of people/organisations, although some were made by only a small number, or only by one individual/organisation. The full comments can be seen on the website. Sometimes the total number of comments listed may not appear to correspond with the breakdown of who the comments were from. This is because of a number of factors; for example, often the same person sent in several different comments, or they sent comments by several methods e.g. email and letter (where possible, identical comments from one individual received by several means are counted as a single submission), or some comments are from two or more people.

In all just over 29,000 comments on the draft GMSF were received from around 27,000 people and organisations. The vast majority of comments – over 94% - are regarding one or more of the proposed allocations rather than the thematic parts of the draft GMSF.

The structure of the document mirrors that of the Greater Manchester Spatial Framework (GMSF) 2016 consultation. This document has two main sections; the first covers the ‘Themes’ (policies relevant to numerous places), the second covers the ‘Allocations’ (specific places).

Some of the comments are relevant to more than one individual section, so the document should be read as a whole.

General Themes

Who Responded

There were three submissions from landowners/developers:

- The Daylesford Trust
- Peel Holdings
- Housing the Powerhouse

There were two submissions from other organisations:

- Peak District National Park Authority
- The Royal Horticultural Society

Summary of Issues Raised

GMCA and Relationship to Local Authorities

- Decisions have been made behind closed doors
- Decisions originating from an organisation people were previously unaware of and have no connection with.

- The process of developing the GMSF has been undemocratic.
- Employment and housing allocations should be pursued through the districts' own Local Plan Allocations Development Plan Documents (DPDs).
- Deciding the use of land should only be the preserve of officers of the local council elected by the residents of that area.
- Confirmation is sought as to the relationship between the GMSF and individual Local Plans, both adopted and emerging, and whether GMSF policies will take precedence.

[How the GMSF is Being Developed](#)

- Suspicion that business rates/council tax revenues are the driving forces
- Suspicion that the proposals have the purpose of boosting profits for developers.
- Concern that developers have had undue influence over the proposals.
- Suspicion that decisions have already been made and responses to the consultation will not make any difference.

[Timing and Amount of Consultation](#)

- Some respondents found out about the proposals from other members of the public and not through the official consultation.
- A belief that relatively few people have heard about the proposals.
- A feeling that it has been very difficult to respond to the consultation in such a short period of time.
- A request that there is more consultation undertaken and that there are more details included in the proposals.
- A perception that there has been a lack of robust debate over the proposals.
- There has not been enough consultation and publicity to inform people of the proposals. Lack of advertising and media coverage.
- Suspicion that there has intentionally a lack of publicity.
- Publicity via newspapers will not target households who do not purchase newspapers.
- Consultation over Christmas is at a very busy and inconvenient time for people to respond.
- Surprise that there have been consultations at previous stages, and a belief that these should have been publicized better.
- The plan should be rewritten with effective consultation.
- Shock that these proposals are only being consulted on now after being developed for so long. There should have been consultation and publicity much earlier in the process.
- Every resident needs to be written to and explained as to what impacts the Greater Manchester Spatial Framework will have.
- The level of detail and engagement with stakeholders is poor and requires a great deal more information and attention.
- Landowners who own farms/businesses in the proposed allocations should have been informed of the plans first, before the consultation publicity.

- Nobody can possibly predict the effect that Brexit will have on the population density or the economy. As a result, the timing of this consultation is extremely poor.
- The Duty to Co-operate has not been adequately met. In particular, there has been a lack of consultation with Cheshire East Council.
- A number of areas are only just setting out on the process of producing a Neighbourhood Plan. It would be a huge waste of resources and a waste of local information if consultation timescales meant that the more detailed information, needs and expectations of local people obtained via the Neighbourhood Planning process could not be utilized.

[Information Provided](#)

- The consultation events:
 - Were very poor;
 - Were not adequately advertised;
 - Had inadequate information at them, including maps;
 - Had an unclear purpose; and
 - Had inaccessible venues.
- The draft plan document:
 - Was very vague on what the proposals are;
 - Included little detail on how development and implementation will be overseen;
 - Included little information on how masterplan proposals will be prepared and implemented;
 - Did not include enough details in the proposals provided to allow people to properly comment on them; and
 - Has too much jargon.
- Consultation Process:
 - The document on which to make comments is lengthy, complicated and out of the comfort zone of many of the residents.

[Responding to the Consultation](#)

- It was unclear how to respond to the consultation.
- The website was difficult to use and make consultation responses through.
- Suspicion that the website was intentionally difficult to navigate.
- Some people found it very difficult to view the allocations map in detail.
- Difficult for those without internet access to respond to the consultation, such as many elderly people.

[The GMSF Proposals](#)

This section includes comments that are responding to the plan as a whole, or the overall approach taken.

- These proposals:

- Will create problems for future generations
- Will ruin communities.
- The quantity of housing being proposed is too large.
- Much of what has been published so far is an economic growth project that has little or nothing to do with the predicted population.
- The plan is all about growth, not quality of life and social wellbeing.
- Generally supportive of the emerging GMSF and the aspiration for Greater Manchester to compete on a global scale and attract further investment to the region as a whole.
- Support the recognition by GMCA for the need to deliver additional housing within the Greater Manchester region through Green Belt release.
- GMCA approach of continually developing the evidence base is supported. Plan must be based on the most up-to-date evidence.
- The Peel Group, one of the major landowners in the area, said they:
 - Are keen to work with the GMCA to ensure that the GMSF can be found sound and adopted expeditiously.
 - Would welcome discussions with the GMCA regarding their response to the draft GMSF, and with individual local authorities regarding the proposals for specific sites.
 - Believe that dialogue outside of formal consultation periods has been minimal
 - Believe that many of the issues raised by themselves and others in previous representations remain unaddressed.
 - Would find more detailed and regular discussions valuable in helping to resolve outstanding issues as the draft GMSF is progressed to a final Publication Draft.
- The Peak District National Park Authority said they encourage the GMCA team to work with them on areas where the impacts of development on the wider landscape (both direct and indirect) is clearly predictable to help produce a spatial framework that benefits both Greater Manchester and the National Park.
- The Royal Horticultural Society said they are supportive of the GMCA in its production of an overarching strategic plan for Greater Manchester.
- Housing the Powerhouse ('a coalition of housebuilders, land promoters, and business voices coming together to campaign in support of the GMSF') said:
 - The Draft GMSF proposes an approach to Greater Manchester that involves selective use of assumptions and methodology, which serves to suppress development needs;
 - Contend that this approach falls short of the benchmark established by case law, national policy and guidance which is being applied across the country; and that;
 - It will reinforce trends that have led to the housing crisis.
- The Daylesford Trust said:
 - Undertaking a joint local plan is welcomed

- It is a missed opportunity to deliver the ambition of the city because it would not deliver the required housing and employment growth.
- Suggested changes include:
 - Substantial increase in the housing requirement;
 - Supply of housing land should be increased and diversified through the addition of deliverable sites, which do not have significant infrastructure requirements
 - Safeguarded land should be identified to meet development needs post 2035.

Vision and Strategy

Who Responded

There were 155 submissions to this section. These were from 108 individuals and 41 organisations:

- Ainscough Strategic Land
- Barton Willmore
- Bill Hetherington & Greenbank Partnerships
- Bolton Friends of the Earth
- Brock Limited
- Bury Green Party
- Campaign for Real Ale
- Commercial Estates Group
- Environment Agency
- First Choice Homes Oldham
- Forestry Commission
- Frederic Robinsons Limited
- Friends of the Earth
- Greater Manchester Cycling Campaign
- Greater Manchester Directors of Public Health
- Himor Group Ltd
- Historic England
- Home Builders Federation
- Legal & General Property Partners (Industrial Fund) Limited and Legal & General Property Partners (Industrial) Nominees Limited
- Littleborough Civic Trust
- Manchester Climate Change Agency
- Members for Worsley Ward
- Natural England
- Peel Group
- Province of Cheshire
- Rochdale Boroughwide Housing
- Saddleworth Parish Council

- Salford City Council Conservative Group
- Steady State Manchester
- Stockport Council Conservative Group
- Stockport Labour Group
- Story Homes
- Tameside Green Party
- The Campaign to Protect Rural England, Friends of the Peak District & The NW Transport Roundtable (single submission)
- The Land Trust
- Trafford Labour Group
- UK Green Building Council
- Wallace Land Investments Ltd
- Worsley Civic Trust and Amenity Society

Summary of Issues Raised

- The ambitious statement was welcomed, particularly the references to climate change and health, skills and quality of life within it.
- Pleased to see a strategic approach providing a spatial framework for economic, social and environmental improvement; support the thematic policies, particularly the provision of a Green Infrastructure network.
- Supportive of the devolution process and the action taken by the GMCA to seek produce and adopt a strategic planning document for Greater Manchester (GM). The identification of housing and economic needs at a strategic level provides GM with a unique and unmissable opportunity to secure and develop its role at the centre of the Northern Powerhouse.
- 'Prioritisation of population increase over standard of living and quality of life'.
- Assumptions for growth are too high, especially in the light of Brexit.
- Based on flawed statistics.
- GM residents should be able to vote for or against this in a referendum.
- Failure to recognise or acknowledge the conservation and enhancement of the historic environment as a strategic priority for the purposes of satisfying Paragraph 156 of the National Planning Policy Framework (NPPF).
- The 'Vision' is myopic. Surely the places to start the scheme should have the roads or rail links in place before anything else happens.
- The proposals fall well short of delivering the vision, particularly the scale and range of housing growth.
- Local government should not be forward planning on this scale.

- The Northern Powerhouse concept is a marketing device. It is a grandiose bloated concept that the GM leaders seem to feel they have to justify by developing grand schemes, presumably to demonstrate their visionary ability.
- The role of the GMSF with regard to Local Plans at local authority level is ambiguous.
- There should be much stronger emphasis on the aspiration of making all parts of GM places where people choose to live and work. This needs to include the regeneration of existing homes and towns as well as new development.
- Such a rate of growth would be undesirable environmentally, socially and economically. GVA growth does not necessarily lead to social well-being.
- Needs a masterplan to support residents' needs and future housing and business growth.
- Brownfield land should be used before Green Belt land is considered.

[*Delivering Success \(GM1\)*](#)

Who Responded

There were 35 submissions to this section. These were from 15 individuals and 18 organisations:

- Bolton Friends of the Earth
- Environment Agency
- First Choice Homes Oldham
- Frederic Robinsons Limited
- Friends of the Earth
- Greater Manchester Cycling Campaign
- Greater Manchester Directors of Public Health
- Harris Lamb
- Harrow Estates
- High Peak Borough Council
- Home Builders Federation
- Natural England
- Peel Group
- Rochdale Boroughwide Housing
- Saddleworth Parish Council
- The Campaign to Protect Rural England, Friends of the Peak District & The NW Transport Roundtable
- The Land Trust
- Worsley Civic Trust and Amenity Society

Summary of Issues Raised

The main points made in the comments submitted for this theme are as follows:

- Support for regeneration and development of existing urban areas, particularly town centres, but concern that the GMSF's strategy of directing growth to the city centre, new

sites in the green belt, and around the airport, will mean a lost opportunity for existing urban areas.

- The stated goals of targeting investment to existing urban areas, and prioritising rail/water transport over road, bear little relation to the bulk of the plan which is about promoting development on green belt sites served by roads.
- Scepticism of the number of jobs in warehousing & distribution, and how these can be accessed by sustainable means.
- Housing proposals should not just be about numbers across GM overall; they should also ensure a mixed and balanced housing offer (housing types, tenures, price ranges) across all communities within GM.
- There should be a particular policy to develop housing for older people.
- Air quality should be improved, particularly around Worsley/Boothstown, and East Wigan (Astley, Tyldesley, Mosley Common). This means avoiding development of the remaining countryside here. (Air quality is an issue here due to the flat, low-lying landscape, and the number of main roads passing through.)
- Proposed growth is likely to increase pressure on health and social care services, and thought is needed about estate design and capacity in the context of GM plans such as the Health and Social Care Plan 'Taking Charge' and the Healthier Together programme. New developments, especially those in the green belt, need links not only to employment but to health and social care facilities, or provision needs to be included in planning.

Strategic Locations

Who Responded

There were 22 submissions to this section. These were from 12 individuals and 10 organisations:

- First Choice Homes Oldham
- Frederic Robinsons Limited
- Home Builders Federation
- Manchester Climate Change Agency
- Natural England
- Network Rail
- Province of Cheshire
- Rochdale Boroughwide Housing
- The Land Trust
- Worsley Civic Trust and Amenity Society

Summary of Issues Raised

- Existing town centres should be prioritised over out-of-town locations.
- Phasing of sites is essential to ensure brownfield locations are developed before green belt/field.
- Question of who came up with the list of strategic locations and the need to co-ordinate plans with adjacent areas outside of Greater Manchester
- More attention should be given to the smaller existing town centres, beyond those in the draft list of strategic locations
- Overly dense development in existing towns could harm their character

- The policy on each location should set out how it will deliver sustainable development including green infrastructure, transport, social infrastructure etc.
- Concern about impact on air quality, climate change, ecology and heritage

City Centre (SL1)

Who Responded

There were 12 submissions to this section. These were from one individual and 13 organisations:

- Bolton Friends of the Earth
- Corridor Manchester
- Environment Agency
- Friends of the Earth
- Greater Manchester Cycling Campaign
- Greater Manchester Directors of Public Health
- Historic England
- Natural England
- Peel Group
- Saddleworth Parish Council
- The Campaign to Protect Rural England, Friends of the Peak District & The NW Transport Roundtable (single submission)

See summary of comments in the 'Allocations' section, below.

Main Town Centres (SL2)

Who Responded

There were 19 submissions to this section. These were from 10 individuals and 11 organisations:

- Altrincham Town Centre Neighbourhood Forum
- Environment Agency
- Friends of the Earth
- Greater Manchester Cycling Campaign
- Historic England
- Natural England
- Peel Group
- Saddleworth Parish Council
- The Campaign to Protect Rural England, Friends of the Peak District & The NW Transport Roundtable (single submission)

See summary of comments in the 'Allocations' section, below.

The Quays (SL3)

Who Responded

There were 10 submissions to this section. These were from four individuals and eight organisations:

- Environment Agency
- Greater Manchester Directors of Public Health
- Natural England
- Peel Group
- Saddleworth Parish Council
- The Campaign to Protect Rural England, Friends of the Peak District & The NW Transport Roundtable (single submission)

See summary of comments in the 'Allocations' section, below.

Airport Gateway (SL4)

Who Responded

There were 14 submissions to this section. These were from three individuals and 12 organisations:

- Bolton Friends of the Earth
- Environment Agency
- Frederic Robinsons Limited
- Friends of the Earth
- Greater Manchester Cycling Campaign
- Greater Manchester Directors of Public Health
- Manchester Airports Group
- Natural England
- Saddleworth Parish Council
- The Campaign to Protect Rural England, Friends of the Peak District & The NW Transport Roundtable (single submission)

See summary of comments in the 'Allocations' section, below.

Western Gateway (SL5)

Who Responded

- There were 27 submissions to this section. These were from 14 individuals and 11 organisations:
- Bolton Friends of the Earth
- Environment Agency

- Friends of the Earth
- Greater Manchester Cycling Campaign
- Historic England
- intu Properties PLC
- Natural England
- Peel Group
- Saddleworth Parish Council
- The Campaign to Protect Rural England, Friends of the Peak District & The NW Transport Roundtable (single submission)
- Warrington BC

See summary of comments in the 'Allocations' section, below.

[Northern Gateway \(SL6\)](#)

Who Responded

There were 77 submissions to this section. These were from 61 individuals and 13 organisations:

- Bury Business Leaders Group
- Bury Liberal Democrat Council Group
- Environment Agency
- Friends of the Earth
- Greater Manchester Cycling Campaign
- Interested Landowners and the Harworth Estates
- Natural England
- Rochdale Development Agency
- Saddleworth Parish Council
- The Campaign to Protect Rural England, Friends of the Peak District & The NW Transport Roundtable (single submission)
- Wilton Estate Second Reversionary Share

See summary of comments in the 'Allocations' section, below.

[Eastern Gateway \(SL7\)](#)

Who Responded

There were 18 submissions to this section. These were from 11 individuals and eight organisations:

- Environment Agency
- Friends of the Earth
- High Peak Borough Council
- Natural England

- Saddleworth Parish Council
- The Campaign to Protect Rural England, Friends of the Peak District & The NW Transport Roundtable (single submission)

See summary of comments in the 'Allocations' section, below.

[Corridors](#)

[Corridors \(General\)](#)

Who Responded

There were 18 submissions to this section. These were from eight individuals and nine organisations:

- Environment Agency
- Friends of the Earth
- Greater Manchester Cycling Campaign
- Historic England
- Natural England
- Peel Group
- Royal Horticultural Society
- The Campaign to Protect Rural England, Friends of the Peak District & The NW Transport Roundtable
- Worsley Civic Trust and Amenity Society

Summary of Issues Raised

See summary of comments in the 'Allocations' section, below.

Derbyshire County Council and High Peak Borough Council stated that the County Council's Officers have worked for several years on an off-road cycling/walking/horse-riding route through Hadfield and Glossop which provides an alternative sustainable transport route to the A628. The route is part built, but Natural England has no further funding. However, this is a potential sustainable transport route, which is worthy of mention as part of Policy SL7.

[Corridors – East Lancs Road \(SL8\)](#)

Who Responded

There were 16 submissions to this section. These were from 12 individuals and two organisations:

- Natural England
- Saddleworth Parish Council

See summary of comments in the 'Allocations' section, below.

Corridors – M61 (SL9)

Who Responded

There were 30 submissions to this section. These were from 25 individuals and five organisations:

- Friends of the Earth
- Harworth Estates
- Natural England
- Saddleworth Parish Council
- Westhoughton Liberal Democrats

See summary of comments in the ‘Allocations’ section, below.

Corridors – M6 Motorway (SL10)

Who Responded

There were nine submissions to this section. These were from seven individuals and two organisations:

- Natural England
- Saddleworth Parish Council

See summary of comments in the ‘Allocations’ section, below.

Employment Land Use

Industrial and Warehousing (GM2)

Who Responded

There were 27 submissions to this section. These were from 18 individuals and ten organisations:

- Arndale Properties
- Cheshire East Council
- Friends of the Earth
- Greater Manchester Directors of Public Health
- High Peak Borough Council
- Peel Group
- Saddleworth Parish Council
- The Campaign to Protect Rural England, Friends of the Peak District & The NW Transport Roundtable (single submission)

Summary of Issues Raised

In Favour of Employment Growth

- Forecasts/models are *not optimistic* and should aim higher to provide for a more positive growth;
- The mix and location of employment appears too heavy on B8 and low skill employment - we need to develop high-skills employment, tied in with training and focusing on improving areas of deprivation.

Critical Comments

- Forecasts/models are *too optimistic* and are unsustainable.
- Evidence is not as robust as it needs to be.
- Comments chime with broader comments on reducing greenbelt/similar loss, more efficient use of existing (brownfield) land and under-used buildings.
- Balance of spatial locations required - some districts already contribute their share of land.

Other Comments

- Warehousing & logistics focus reinforces low-paid jobs in certain areas: these areas need development of better career prospects.
- A neighbouring authority's approval of employment land within GM boundaries and spread across GM.
- Andy Burnham commented that there is a need for economic development based on the Economic Review for the Northern Powerhouse. Needs to be based on more than simple numbers. At present, there is insufficient balance, in favour of low-skilled/paid jobs, especially warehousing and distribution. GM needs a new industrial base, focusing on advanced manufacturing, energy, health innovation and digital industry.
- Ivan Lewis MP: Identifies a need to join up employment land availability and an education, training and skills strategy.
- Kate Green MP: Welcomes the expansion of employment, noting that it is essential that it should target the disadvantaged.
- Jim McMahon: The evidence is not as robust as it could be, and that Oldham and Rochdale are already providing their fair share of industrial (and by association, employment) land.
- Liz McInnes MP: Over-emphasis of B8 in lieu of other employment classes.
- The argument that green space is important, while proposing green belt sacrifice for employment use does not make sense.
- Unused/underused employment land (notably Wingates) should be redeveloped.
- Some allocations stipulate B2 & B8 – which is very vague considering the impacts development would make.

- Data regarding empty properties, vacant office blocks and empty mills should be used to bring property back into use (notably in Bury).
- Another comment made a passing reference to employment land in context of a ‘brownfield first’ argument.
- Joint response: Council for the Protection of Rural England (CPRE), Friends of the Peak District, NW Transport Roundtable. Jobs projections are based on untenable economic growth assumptions.
- “They should have submitted plans for the redevelopment of housing in place of central retail and office sites”
- The economic/jobs growth rate is insufficient at 0.7%, and should be more ambitious in context of Northern Powerhouse and ‘game changers’ such as HS2. Recommended replacement growth targets varied between 2% to 2.8%.
- Site-specific references to suitability of land for employment.
- Traffic into Manchester is as a result of employment being outside the district (Tameside).

Offices (GM3)

Who Responded

There were 19 submissions to this section. These were from 13 individuals and eight organisations:

- Cheshire East Council
- Friends of the Earth
- Greater Manchester Directors of Public Health
- Peel Group
- Saddleworth Parish Council
- The Campaign to Protect Rural England, Friends of the Peak District & The NW Transport Roundtable (single submission)

Summary of Issues Raised

Oversupply

- There are many vacant office spaces in the region at present, as well as other vacant units. These should be utilised before any further office units are built.
- Home working and hot-desking need to be fully taken into account. The Office for National statistics released figures in 2014 which showed that 14% of employed people in the North West were working from home all or part of the week – and the trend was steeply upwards.
- Many office blocks are now being converted to apartments
- The projections rely on untenable economic growth assumptions, which are greatly in excess of baseline forecasts. Such a huge scale of over-supply poses significant risks in terms of the ability of the GMSF to be implemented. Such high figures fail to observe downward past trends in employment premises take up and technological advances.

- CPRE cannot support policy GM3 because an oversupply of office accommodation is being made.
- Risk insufficiently large labour force to sustain office space provision.

[Accessibility](#)

- Stockport town centre: the transport system from the south side is poor.
- Greater Manchester Directors of Public Health: Need to ensure that all offices are safely and easily accessible through walking and cycling routes and by public transport, and that steps are taken to minimise the use of private cars (e.g. through parking controls).
- I would like to suggest that any new office developments are fitted with secure bike storage facilities and shower facilities.
- Highways England are mindful of the potential impacts of further development at Manchester Airport and request that the cumulative impacts are fully accounted for.

[City Centre/Regional Centre/Town Centres](#)

- Peel supports the approach to office development within the City/Regional Centre.
- Highways England welcome the concentration of office space in existing district and city centres.
- It is agreed that office development should be mainly located in the major town centres. The allocation for Wigan, however, is one of the smallest in Greater Manchester. This should be increased to provide jobs which reduce the need for long journeys by car or public transport and to reflect the influence of the High Speed Rail link where Wigan will be a key hub.

[Salford Quays](#)

- Peel supports the approach to office development within the Quays.

[Trafford City](#)

- Peel: Given the growth potential of the area Trafford City should be included in policy GM3.

[Clarification of Growth Figures](#)

- CPRE: An oversupply of office accommodation is being made, based on outdated economic formulae.
- The projections on office space are highly questionable.
- The identification of the 2,450,000sqm figure for B1 office floorspace is not fully clarified through any of the background papers. The background paper titled Employment Requirement Approach states that a 15% uplift to past office development rates has been applied without any underlying context provided. The uplift appears arbitrary and transparency is needed. There is no in-depth analysis of the types of office floorspace that will be required in order drive future economic growth over the plan-period of the GMSF.

[Location of Office Development](#)

- The City Centre should be the focus of office uses, followed by The Quays and Main Town Centres, to take advantage of their sustainable locations and good public transport links.

- It might reduce overall journey times and distances if offices were also constructed and/or developed more locally, perhaps at train stations and other public transport routes thus encouraging workers to walk to work or cycle.

Green Infrastructure

- Greater Manchester Forests Partnership and Manchester City of Trees: Further emphasis on the importance of high quality green infrastructure and street trees in setting the scene for inward investment through the provision of attractive and healthy local environments that can help the city region compete at an international level.
- We do not want sky scraper buildings which blot the landscape or take up enormous amounts of green belt.

Retail, Leisure and Tourism (GM4)

Who Responded

There were 30 submissions to this section. These were from 20 individuals and 14 organisations:

- Arndale Properties
- Frederic Robinsons Limited
- Friends of the Earth
- Greater Manchester Directors of Public Health
- High Peak Borough Council
- Historic England
- Peel Group
- Saddleworth Parish Council
- The Campaign to Protect Rural England, Friends of the Peak District & The NW Transport Roundtable (single submission)
- Theatres Trust

Summary of Issues Raised

Support

- There is general support for policy GM4 from a number of people/organisations including:
- Greater Manchester Directors of Public Health: Policy GM4 is extremely welcome, especially the reference to gardens, green space, the countryside, canals, rivers and heritage, all of which can improve health and wellbeing.
- Peel supports the enhancement of retail, leisure and tourism offer, the increased use of canals and the proposal for RHS Bridgewater Garden.
- CPRE is generally supportive of Policy GM4.
- Frederic Robinsons Limited support Policy GM4 overall especially the aspiration to promote and support growth and investment within the leisure and tourist industry.
- Intu support the retail aims of Policy GM4 as well as the retail hierarchy.
- The National Trust are pleased to see countryside and major parks and gardens in policy GM4.

- Historic England support the inclusion of a specific policy on retail, leisure and tourism in Greater Manchester.
- Several residents support Policy GM4, considering that if applied appropriately it will help protect and enhance the unique character of the Pennine District with its collection of historic village communities, dramatic landscapes and recreational amenities.

[Arts, Culture and Community Facilities \(Including Creative Industries\)](#)

- The Theatres Trust outlines the many benefits of culture and creative industries and their importance to the economy. The Theatres Trust is pleased that this version of the draft GMSF includes greater recognition of the importance of culture to creating sustainable cities. The Theatres Trust looks forward to seeing specific policies to promote and safeguard cultural facilities in the individual local plans.

[Vacant Retail Units](#)

- The UK High Street is undergoing major change driven by out of town developments and the internet. The consequential high level of shop closures and vacancy rates is a major challenge which the GMSF ignores.
- Can existing vacant units not be filled rather than new ones being built?
- Retail units vacant as a result of the contraction of retail floorspace should be considered for alternative uses such as housing. CPRE argue that where retail units are retained or new ones built there should be an active policy of LOTS “Living Over The Shop”

[Leisure/Tourism](#)

- Lyme Park: The A6 from Stockport to Lyme Park is a nightmare. The countryside will be polluted by all the car emissions, so people will not want to go there anyway.
- The focus should be on brownfield sites.
- Tourism will be adversely affected by encroachment on the green belt.
- Appreciate that several major parks and gardens have been identified as especially important in policy GM4. However, the admission charge for the RHS Garden Bridgewater may mean it won't be visited frequently by many Manchester residents. The green spaces close to our homes are those that people value and benefit from the most. More should also be done to promote simple no/low cost outdoor activities, for example, Hollingworth Lake, build more and better playgrounds, host regular coached sessions at the “outdoor gyms”, mum and buggy walks. Non-middle class areas should be targeted.
- The leisure industry in Rochdale isn't great. Rather than a new cinema/restaurant there should be a focus on leisure activities that will improve health and increase opportunities to learn about the outdoors, especially children from low income families.
- Opening up the river in Rochdale will not attract tourism. The money should have been spent on restoring Rochdale Town Hall, especially the Great Hall and Touchstones Museum.

- If you want to enhance tourism opportunities in the Peak District National Park you need to provide adequate transport infrastructure, not just a link road that is currently being proposed but the proper bypass (Mottram-Hollingworth-Tintwistle).
- How will the addition of 2000 homes across Littlemoss/Droylsden impact on the current leisure facilities? The answer isn't simply to say go to another leisure centre.
- GMCA should look at all the opportunities for the creation of open green spaces both within and outside built up areas.
- Many of the proposed areas contain stabling and grazing for horses. There is no mention as to how these horses will be accommodated. The proposals will drive up the costs of horse ownership and could add to the animal welfare issue. The proposals will also result in the loss of off-road riding areas. There is an increasing number of serious accidents on the roads involving horses. Many riders are now too nervous to ride on the road and safe off-road riding tracks are needed.
- Need to encourage a vibrant evening economy with restaurants etc.
- Building shouldn't take place on the former school playing field at Greenhurst Lane as it is a valuable resource for young people.
- Where leisure/tourist related developments are not commercially viable, the plan must be supportive of the provision of alternative uses to reduce the risk of creating visual eyesores.
- Peel requests that the major sporting and leisure opportunity at Hulton Park is included within policy GM4.
- Derbyshire County Council/High Peak Borough Council state that Policy GM4 should make reference to Longendale and Glossop as gateways to the National Park.
- There is a contradictions between the statement in policy GM4 that the proposed RHS Garden Bridgewater should be protected from built development that could detract from its attractiveness and the proposal to allocate a significant area just to the west of the site for housing.
- With regard to point 8 of Policy GM4, there will be no distinctive landscape to view if the majority of the area leading to the Pennines is covered with ugly square warehousing and office buildings

[Canals and Watersides \(Include Within Leisure When Summarised\)](#)

- We should do more with our watersides. They are an environment that attracts families, single adults, groups etc.
- The North and North Wales Canal and River Trust welcome the reference in policy GM4 to the importance of canals and river valleys, and the intention to encourage leisure and tourism in association with them across Greater Manchester.

Retail

- The amount of income in the economy is finite, and any retail development means an attempt to capture this revenue from someone/somewhere else
- Availability of fresh, healthy food is often worse in deprived areas. We recommend a policy statement regarding the need to consider citing of food retail outlets so as not to exacerbate existing health inequalities.
- Do we really need more charity shops and fast food stores?
- The draft GMSF is very weak in relation to plans for future retail development. The plan is silent on the hugely important issue of the impact of the internet, this needs to be addressed and explicitly factored in to the calculations for retail floorspace. The growth of online retail, and a greater interest in authentic, local and ethical shopping imply that there may be a reduction in land utilised by major supermarkets and out of centre retail developments and an increase in niche shopping facilities in town centres. This should be considered in the plan and appropriate allocations made.
- There is no consideration of the role of retail centres beneath the main district centres. While it is appropriate that the individual centres are identified in District Plans, GMSF's assessment is incomplete without an understanding of the generic role that these centres are expected to play in the retail hierarchy.
- Policy GM4 refers to optimising the scale and range of retail offer, this could be interpreted in any number of different ways.
- AGMA must face up to the damage done to small and medium scale retail by over emphasising the importance of big chains. SME's should be supported to make high streets more individual. We want local shops not retail parks with little or no interest in the local community.

Trafford Centre

- All references to the Trafford Centre should be updated to intu Trafford Centre.
- Whilst the intu Trafford Centre is not included in the retail hierarchy set out within draft policy GM4, draft policies SL5 and GM4 recognise and support the role of the area as a major tourism, retail and leisure destination. Intu welcome this strategic policy support. Through these policies the GMSF must allow the Trafford Centre to evolve and adapt to the changing retail and leisure market.

Town Centres

- The list of main town centres under policy GM4 omits Altrincham. Presumably this is a mistake. If it is not we would formally object to its omission.
- Rochdale Town Centre: a new tram line takes people out of the town centre to Manchester resulting in local businesses and independent shops struggling.
- Rochdale Town Centre: A thriving town centre needs people to earn a decent income which is not happening. RMBC needs to attract people to live and work in the borough.

- Rochdale town centre: how will retailers and customers be attracted back?
- Droylsden: during the Metrolink extension many local businesses disappeared.
- People will not go into these towns with the current problems with the roads and appalling train services.
- Each place should retain local distinction.
- Policy GM4 makes no reference to the need to re-define the role and purpose of the main town centres as a result of the growing impact of the internet. They need to provide leisure, cultural, civic, social and community based activity as well as retail and business services.
- Many town centres have felt abandoned for a long time and it is important we focus on reviving our town centres with a mixture of commercial and housing investment.
- There should be better access to public transport and infrastructure.
- GMCA needs to do more to remove obstacles to town centre regeneration including decontaminating land.

[Fast Food Outlets and Takeaways](#)

- Fewer fast food outlets and takeaways

[Heritage](#)

- Historic England: Policy GM4 does not sufficiently recognise the important role the historic environment plays. It is disappointing that the East Lancashire Railway is the only asset referenced in bullet 11. The following amendment is suggested to the wording of Bullet 11: "Heritage – taking advantage of Greater Manchester's historic environment which provides many of the places and public spaces that can be the backdrop to events, and implementing improvements to visitor experiences and sites which are heritage destinations in their own right and which contribute to the unique 'brand' of Greater Manchester".
- Similarly the National Trust state that Point 11 is weak; there are many more historic assets. Reference to a single asset should be removed and a more general statement of support included.
- National Trust: Point 1 and 3 of Policy GM4 need to include cultural heritage as attractions.

[Green Infrastructure](#)

- Greater Manchester Directors of Public Health: Policy GM4 should contain an additional point about incorporating green infrastructure into all planning and development even in built up areas e.g. town and city centres.
- Greater Manchester Forests Partnership and City of Trees: Policy GM4 needs to highlight the importance of quality of environment including high quality green infrastructure in enabling tourism, leisure and retail to grow and flourish.

Salford Quays

- Intu: Salford Quays is not identified as one of the eight main town centres in the hierarchy. Any growth in retail floorspace at Salford Quays should be proportionate to its emerging role and function.

Other Comments in Relation to Policy GM4

- Peel state that Policy GM4 should provide unambiguous support not just for activity but for growth, arguing that the text should be amended to state that the expansion of the same locations for tourism and leisure uses is permitted.
- Policy GM4 should recognise the enhanced position of Wigan as a transport hub with the coming of the High Speed Rail link.
- Corridor Manchester would be deemed as part of the City Centre.
- I have a general concern about the implementation of policies including GM4 with regard to enhancing the unique character of the Pennine district. Similar statements have been made in the past to no effect. More guidance to LPA's on implementation of these policies is required if they are to have any meaning in practice.

Housing (GM5)

Who Responded

There were 111 submissions to this section. These were from 79 individuals and 26 organisations:

- Age Friendly Manchester Older Persons Board
- Blackburn with Darwen Borough Council
- Chorlton Planning Ltd
- First Choice Homes Oldham
- Frederic Robinsons Limited
- Friends of the Earth
- Great Places Housing Group
- Greater Manchester Cycling Campaign
- Greater Manchester Directors of Public Health
- Heyford Developments Limited
- High Peak Borough Council
- Home Builders Federation
- Housing the Powerhouse
- J. Murphy and Sons Ltd
- Maxilead Ltd
- McCarthy & Stone Retirement Lifestyles Ltd
- Members for Worsley Ward
- Milnes Gaskell Estate
- Peel Group
- Province of Cheshire
- Rentplus
- Rochdale Boroughwide Housing

- Saddleworth Parish Council
- The Campaign to Protect Rural England, Friends of the Peak District & The NW Transport Roundtable (single submission)
- The Land Trust
- Worsley Civic Trust and Amenity Society

Summary of Issues Raised

Distribution of New Housing Provision

- It was noted that the authorities to the south and east of GM are generally providing a significantly smaller amount of housing growth than the areas to the centre and west. It should be made clear how the growth targets have been set, and how this represents a sound, suitable and sustainable approach to growth. It is argued that to ensure the benefits sought by the draft GMSF are more fairly distributed across the plan area the split of development needs to be reconsidered in a more equal manner. A further comment goes on to say that the numbers put forward seem to be as a result of a series of over inflated targets which have nothing to do with local demand (GMSF 2505). There were comments put forward from surrounding districts such as High Peak who pointed out that they had a Memorandum of Understanding with Tameside and Stockport that there would be no requirement from them to contribute to any shortfall within GM.

Timescale

- Timescales and the prioritisation of sites were also discussed in a number of comments (e.g. GMSF809 and GMSF 2351). It was felt that it was not clear in GMSF how the phasing of new housing will be calculated and it was suggested that for example, the sites with good infrastructure should be delivered first. It was argued that a 'sequential test' could be carried out and that areas such as Tameside, Salford and Wigan who could all do with better housing provision and higher incomes to support their service provision should be prioritised ahead of Manchester, Trafford and Stockport. Furthermore some sites will have more regeneration needs than others and development of these sites will need to be beyond the normal market timescales.

Scale of Development

- CPRE state that 11,360 dwellings per annum over the plan period up to 2035 represents an untenable spike in population growth and household formation and the assumptions made have little or no prospect of occurring during the specified plan period and the house building industry have little or no prospect of achieving the level of housing completions suggested as being needed. CPRE go on to say that GMSF is predicated on an erroneous methodology, and it must be remedied by a reassessment of both the jobs and housing evidence base. An independent expert demographer undertook a demographic appraisal of the housing evidence on behalf of CPRE *and this will be discussed further in the SHMA/OAN section of this report*
- On the other hand there were some comments that either supported the housing growth numbers or that they did not go far enough. Cheshire Masons, for example, generally support the Housing Policy set out in Policy GM5 and note the housing requirement figure stated in Table 8.1 in relation to Trafford. The level and need for housing was recognised by

Dr Tim Levin (GMSF4304) in particular who went on to say that he would hope local MPs could see past the opinions of a few pressure groups to the wider needs of the whole area. Some opposition is nothing more than playing politics or nimbyism.

- Peel: The evidence of deliverability put forward in GMSF only meets requirements of small segments of the population and the planned level of housing of 11,360 homes a year is insufficient to address longstanding issues of historic under-supply, let alone the needs which will arise in future years as the workforce grows. Planning at this level will exacerbate the current shortage of land, deepen the housing crisis, fuel affordability problems and constrain economic growth prospects and social mobility. In summary they suggest that this level of growth will simply perpetuate and exacerbate the housing crisis in the city. It does not represent a sustainable option when considered against reasonable alternatives and therefore is unsound as there is no systematic evidence of the deliverability of this land. On the basis of Peel's work to date, it is considered that the full OAN for housing in GM exceeds 13,000 homes a year and a higher level of housing, in excess of 15,000 homes a year, is needed for GM to truly realise its vision and respond in full to the objectives of the Northern Powerhouse and urges GMCA to commit to delivering the right amount of housing, of the right type and in the right places to meet needs, and to support this likely growth in the labour force which will require the release of additional Green Belt in strong market areas and a balanced approach to the delivery of the infrastructure needed to support this growth.

Re-Use of Existing Stock

- There was a lot of criticism of the focus on new build properties throughout the framework and it was felt that there needs to be more of a focus on use of existing stock. There seems to be no or very little evidence of the analysis of empty home across the ten local authorities and that this should be addressed as a key issue (GMSF 1492; 1592; 1713; 1207). It was felt that it was short-sighted to assume that all the proposed growth in housing stock is intended to be through new build.

Affordable Homes

- There was concern raised that the housing that is to be developed would be the housing that would not meet demand. It was seen that the expensive housing would be built in favour of more affordable housing. There was general criticism that the plan was overall based on "greed rather than need". Furthermore it was assumed that this expensive housing would be built on green belt rather than there being a focus on more affordable homes on brownfield sites.

Brownfield First

- There should be a clear policy of brownfield first and then as a matter of very last resort the green belt could then be assessed and that there should be clear allocation of the provision of social housing (GMSF1941; GMSF815)

Infrastructure

- There is a clear link between housing development on the scale proposed and the fact that the current infrastructure simply would not cope. The housing development required simply cannot go ahead before any thought is given infrastructure yet there was nothing

clearly outlined about this in terms of education, health and public transport provision in particular.

Tenure Mix

- There was also broad criticism that there was no detail on the tenure mix of any new housing and that there should be a more explicit statement of the overall mix required. Even where it was recognised that this could be a local decision it was suggested that a strategic plan such as this should at the very least inform the direction of the required tenure mix within the local plans. (GMSF2137).

Housing Type

- In terms of housing type it was felt that there was generally too much emphasis on the building of apartments rather than houses and in particular family homes. In the view of the Age Friendly Manchester, for example, 85% (2350 units) per year in the form of apartments in Manchester is too high a proportion compared with only 15% (415 units) in the form of houses. The 15% will need to include (among others) house types suitable for starter homes; homes for families, including inner-city housing that is suitable for family living; homes for disabled people; and accessible housing to allow older people to 'age in place' (ref. Manchester's All Age Disability Strategy). It is argued in light of this that the proportion of housing (rather than apartments) proposed for Manchester should be increased to reflect this.

Brexit

- Brexit was a major issue that was cited by the majority of comments in this section. It was recognised that the housing calculations had been undertaken before the UK's decision to leave the EU had been agreed. It was generally felt that this national decision would seriously undermine the projections put forward in the plan. As a consequence of the perceived reduction in net immigration there was general consensus that the amount of land required for new household formation would be less and therefore that Brexit calls into question the housing figures and whether the release of Green Belt will be required.

Older Persons Housing

- A number of comments highlighted the issue of older persons housing (1084; 2925) and in particular recognising the need for specific products to meet the needs of the growing older population. It was felt that this segment of housing need should be set out more clearly as part of the residential offer. Age Friendly Manchester (AFM) design group found it difficult to reconcile the two statements in the reasoned justification of growth in single person households and demand for apartments and the two thirds of population growth being those aged 65 and over. They stress that apartments are rarely designed to meet the needs of older people. They go on to suggest that there is anecdotal evidence to suggest that some older people would prefer to down-size from housing in the suburbs and move to the city centre in order to benefit from living in proximity to Manchester's vibrant city centre culture, including art galleries, theatres and concert halls. The city should aim to retain these older residents, for both social and economic reasons, by designing suitable age-friendly housing in the city, including in the city centre to stop the net outflow of older people as well as to encourage downsizing.

Health

- The link with housing and health is also raised. The Greater Manchester Directors of Public Health suggest that the framework could be greatly strengthened in terms of the ambition for the new housing development supporting good health particularly in terms of reference to the elimination of bad housing conditions in new developments, overcrowding, insecurity of tenure and poor physical condition all constituting to a risk to health. Reference could be made to the 2006 Shelter study which suggested that children in bad housing conditions are more likely to have mental health problems, such as anxiety and depression; to contract meningitis; have respiratory problems; experience slow physical growth and have delayed cognitive development. Cold housing is a further health risk and believed to be the main explanation for the non-flu extra winter deaths² occurring each year between December and March. Housing provision needs to be adaptable so as to be able to accommodate a range of people, and still be appealing, to allow for changing demographics of the population. They also feel that it would be good to make mention of social inclusion and strengthening social capital through considered approaches to housing developments. Furthermore, evidence around housing density and its impact on health (Hart, 2008) shows that much less interaction between neighbours in streets which are heavily trafficked than in streets which are lightly trafficked. Given the clear evidence of the positive effect of social support networks on health there are likely to be significant health impacts to this.

Self-Build

- Other issues are covered in less detail including self-build; questioning as whether economic growth does equal household formation (2358).

Design

- More of a focus on quality and design rather than just a focus on numbers and in particular a number of references to the provision of allotments.
- Design could also help in tackling homelessness and homes for young people with flexible unit design (2389).
- Opportunities for low carbon (2895).

Accessibility and Transport

Who Responded

There were 86 submissions to this section. These were from 71 individuals and 16 organisations:

- Bolton Friends of the Earth
- Cheshire East Council
- Friends of the Earth
- Greater Manchester Cycling Campaign
- Greater Manchester Directors of Public Health
- High Peak Borough Council
- Manchester Climate Change Agency
- Members for Worsley Ward
- Peak and Northern Footpaths Society

- Peel Group
- Saddleworth Parish Council
- The Campaign to Protect Rural England, Friends of the Peak District & The NW Transport Roundtable (single submission)
- The Land Trust
- Worsley Civic Trust and Amenity Society

Summary of Issues Raised

- There were a total of 38 responses relating to general transport issues.
- Over half stated that existing traffic congestion and pollution from cars was already unacceptable and would only get worse with additional development. A small number of these responses also stated that there would be increased pressure on existing local facilities and services (such as education and health care) which GMSF made no provision for.
- 18% of responses stated the need for investment in the highway network and the same percentage expressed the need for public transport / active travel investment. A small number suggested that these improvements need to be provided before any additional development comes forward but did not explain how this would be achieved. 23% of responses challenged or questioned the ability to deliver the required transport infrastructure and/or if the necessary funding would be made available.
- There were 6 suggestions for improvements to the transport network, all of which have either previously been considered or are under consideration.
- 18% of responses stated that GMSF needed to be better integrated with the 2040 Transport Strategy and 2 responses also stated that it needs to be better integrated with other policy areas such as health care.
- One comment noted that the selection of sites was not prioritised by their public transport accessibility.
- Surprisingly there was only one suggestion for orbital public transport infrastructure as oppose to radial.
- One comment proposed that the GMSF relies too heavily on road transport corridors and to increasing road provision but fails to offer any robust or convincing alternative.
- Network Rail suggested that GMSF should include policies on the following:
 - Level Crossings;
 - Section 106 contributions to improve stations (including Deansgate Station); and
 - An arches and viaducts policy to encourage economic use and activity.

Accessibility (GM6)

Who Responded

There were 86 submissions to this section. These were from 71 individuals and 16 organisations:

- Bolton Friends of the Earth
- Cheshire East Council
- Friends of the Earth
- Greater Manchester Cycling Campaign

- Greater Manchester Directors of Public Health
- High Peak Borough Council
- Manchester Climate Change Agency
- Members for Worsley Ward
- Peak and Northern Footpaths Society
- Peel Group
- Saddleworth Parish Council
- The Campaign to Protect Rural England, Friends of the Peak District & The NW Transport Roundtable (single submission)
- The Land Trust
- Worsley Civic Trust and Amenity Society

Summary of Issues Raised

- There were a total of 126 responses to the Accessibility (GM6) section of the Framework.
- Just under 20% of the responses were in support of the Accessibility section, often stating that it was vital, critical or pivotal to the overall success of GMSF. Most of these responses stated that further investment in the public transport and active travel networks was a required priority, a number also stated that further investment in the highway network, on the Strategic Route Network (SRN) or the Key Route Network (KRN), was also required.
- However approximately 8% of all responses challenged or questioned the ability to deliver the required transport infrastructure or if the funding would be made available. One comment stated that there needs to be a rethink about the provision of infrastructure and how this is funded. A small number also questioned the apparent incompatibility of the section in support of the expansion of Manchester Airport and global travel with the air quality objectives of the Framework.
- Approximately 16% of all responses also suggested particular areas or specific transport schemes where investment should be targeted for highway, public transport and active travel networks. Including motorway junction improvements, town bypass schemes, rapid transit or tram-train schemes, improvements to the bus network and cycle infrastructure schemes. All of these have previously been considered or are currently being considered for further development.
- Just over a third of all responses (47) stated that existing congestion on the highway network in the peak period was already a serious problem stagnating economic growth and adding to pollution, some of these responses suggested that it was also a problem outside the peak period in certain locations, a few were site specific and raised objections to particular sites on these grounds. Many of these respondents also reported that the public transport network in their area was also overcrowded, inadequate or did not cater for their needs. Most of these responses made the connection that additional housing or employment development would generate additional journeys on the already congested networks stating that this was unacceptable or that the networks “would not cope”.
- 7% of all responses stated that the required transport infrastructure should be provided prior to allowing any new development to come forward. A similar number of

responses also stated that the existing services and facilities such as healthcare and education were already overcrowded or difficult to access and that GMSF made no provision for the additional demand that the development would place on these services.

- Over 10% of responses stated that GMSF needs to be better integrated with TfGM's Transport Strategy 2040 or that a transport strategy across GM should be better integrated with other strategic objectives such as land use/economic development/housing provision and health.
- A number of neighbouring authorities commented that there was a need to pay greater consideration to cross boundary journeys and the demand for travel across the GM boundary and offered to work with GMCA to this end.
- There were also a number of requests to protect and expand PRWs and green infrastructure corridors for active travel.
- Two responses stressed that the site selection for the sites to be released from the Green Belt should prioritise sites on their accessibility by public transport and active travel and the current version of GMSF was not doing this.
- One respondent suggested that there was a lack of coordination between the GMSF and HS2 proposals and that this oversight would additionally burden the green belt.
- One respondent suggested that a policy for car free development should be included in order to maximise the development potential of smaller brownfield sites and to promote healthy lifestyle, reduce flood risk, are more sustainable and reduce the need for Green Belt development.
- In addition it was noted by one respondent that policy GM17 promotes logistics and freight sites that are accessible by rail and water but that the identified sites are almost exclusively greenfield sites located on the motorway network, therefore leading to an increased burden on the existing network and unsustainable congestion coupled with increased air pollution.
- Network Rail requested that a number of other stations were added to those listed in the accessibility section as being significant rail stations within GM, notably Manchester Oxford Road, Manchester Victoria, Salford Central, Stalybridge, Bolton, Altrincham and Rochdale stations.

[Infrastructure \(GM24\)](#)

Who Responded

There were 63 submissions to this section. These were from 46 individuals and 17 organisations:

- Denton South Neighbourhood Plan
- Electricity North West Ltd
- Environment Agency
- First Choice Homes Oldham
- Friends of the Earth
- Greater Manchester Cycling Campaign
- Greater Manchester Directors of Public Health
- Heyford Developments Limited
- High Peak Borough Council
- Home Builders Federation

- Natural England
- Peel Group
- Rochdale Boroughwide Housing
- Saddleworth Parish Council
- The Campaign to Protect Rural England, Friends of the Peak District & The NW Transport Roundtable (single submission)

Summary of Issues Raised

- Twenty one responses supported the approach to securing the delivery of infrastructure proposed in Policy GM24 and 4 suggested improvements to this policy. However 10 responses (from developers) stated that the policy needed to recognise the viability of developments and the need for any developer contributions to be supported by evidence to satisfy NPPF tests and regulation 122 of CIL to ensure appropriately justified.
- Three suggested removing part of Policy GM27 relating to infrastructure “pooling” strategy for sites in multiple ownership as this was limited and was better dealt with through CIL. Two responses also asked for GMSF to clarify GMCA’s intentions in relation to CIL. Two further responses suggested removing the section relating to utilities provision, maintenance and enhancing resilience as this is the responsibility of the utilities provider and developers should not be burdened with this.
- A large number of responses (19) stated that the existing infrastructure (roads, schools, drainage, water supply, health care etc.) is incapable of coping now let alone with additional development and some suggested that upfront investment was required. A further 24 responses specifically singled out transport infrastructure stating the existing transport infrastructure (mainly roads) could not cope now and GMSF does nothing to address this.
- Eleven responses stressed the need for investment in roads and public transport infrastructure before any housing development. 5 responses stated that there was no evidence that there would be investment in the local public transport network and a further 5 challenged the deliverability and funding of any necessary transport infrastructure and public transport provision.

Environment

Green Infrastructure (GM7)

Who Responded

There were 63 submissions to this section. These were from 41 individuals and 23 organisations:

- ABAS
- Action Against Astley Road Development (AAARD)
- Bolton Friends of the Earth
- Cheshire Wildlife Trust
- Environment Agency
- Frederic Robinsons Limited
- Friends of the Earth
- Gatley Hill Allotment Society

- Greater Manchester Cycling Campaign
- Greater Manchester Directors of Public Health
- Leigh Ornithological Society
- Manchester Climate Change Agency
- National Trans Pennine Trail Office
- Natural England
- Newboult Road allotments Association
- Peak and Northern Footpaths Society
- Peel Group
- Saddleworth Parish Council
- The Campaign to Protect Rural England, Friends of the Peak District & The NW Transport Roundtable (single submission)
- The Land Trust
- Wildfowl and Wetland Trust

Summary of Issues Raised

- Many responses support the proposal for increasing green infrastructure with more trees, 'green roofs/walls and 'green driveways / parking' creation of pedestrian & cycle routes. Some propose it should be required and there should be a net gain, targets and timescales for green infrastructure, integration with existing green infrastructure and the creation of networks.
- Existing green infrastructure that should be retained, shown on a map and protected like Green Belt.
- Too much emphasis on creating new green infrastructure.
- Green infrastructure has a dual role for biodiversity and for people, however the introduction to policy GM7 fails to reflect this dual role by omitting reference to biodiversity. This should be reworded.
- Disjoint between Economic Growth Policy and green infrastructure.
- Local groups should be involved in drawing up a list of green infrastructure assets.
- When reviewing the provision of green infrastructure over the entire plan area, the focus should be on high quality greenspaces. It must be acknowledged that there are some existing allocated greenspaces which offer little to no amenity value and recreation purpose to their local community.
- Manchester Friends of the Earth commented that the policy includes no reference to specific targets or timescales, which is in marked contrast to the housing, commercial and road network policies and priorities. The GMSF needs to identify ambitious targets for the green infrastructure policy to provide a mechanism for assessing progress as new development is brought forward.
- Existing agricultural land should be protected and all new development must provide space for food growing.

[Natural England:](#)

- There is a disconnect between GM7 and GM25. It would be beneficial to have further mapping to clearly show the green infrastructure network and where there are opportunities to enhance it, with links to the evidence base which has informed it.
- The policy does not incorporate the NPPFs definition of green infrastructure.
- GM7 could make it clearer how the 5 strategic elements link with designations and site allocated in the plan.
- Suggest the GM13 Green Belt is harmonised into the green infrastructure network. Key priorities are welcomed; recommend that a specific priority is added: Greater Manchester green infrastructure should be designed, managed and protected in order to deliver critical benefits for the environment, economy and communities.
- Priority 1 should be strengthened and greater emphasis on the quality and quantity of green infrastructure.
- Priority 6 Air Quality. Emphasis on managing air quality as opposed to enhancement.
- Recommend that specific wording is added re how to achieve this target e.g. encouraging use of sustainable travel option.
- No description of how figure 10 relates to the GMSF and the interpretation of green infrastructure in GM7.
- Reference to reduced agricultural activity more appropriate to refer to changes in agricultural practices.
- NPPG says Local Plans should identify the strategic location of existing and proposed green infrastructure networks. GMSF does not currently identify new elements of the network. GMSF should clearly set out what it expects lower tier Local Plans to cover.
- GMSF should make clear the difference between the ecological networks and the green infrastructure network.

[The Environment Agency:](#)

- Recommend that green infrastructure is considered in natural capital terms. Some suggested wording: "Opportunities for enhancement of the Natural Environment are sought through ecosystems services and/or natural capital approach".
- We recommend that you replace Manage flood risk to 'Manage current and future flood risk' - this reflects the role in longer term climate resilience and flood management.
- Key Priority 10. We recommend that you replace Improve water quality to improve water quality and habitat.
- Key Priority 3 green infrastructure should also be integrated as part of the design of any new development. Future management is also a key consideration recommend that this is reflected in this priority.

- The Land Trust: green infrastructure can also be beneficial for community cohesion, health and education. It must be clear how and who will deliver it in a strategic way as with other infrastructure items and the costs and wider implications of long-term management. There is also a need to ensure that effective monitoring and evaluation systems are put in place.
- Church Commissioners: It is unclear what the justification is for the designation of GI areas given that some parcels being promoted are in agricultural use and so their contribution towards Green Infrastructure can be regarded as negligible. The Natural Environment background paper does provide some analysis of Green Infrastructure Our view is that this information in itself is not sufficient and the evidence does not exist. Therefore we request that Bow Green Farm, Bowdon is removed as a Green Infrastructure designation in the GMSF.
- Rossendale Council: Cross boundary linkages are key to the success of any such infrastructure and we would welcome the opportunity to link enhancements in Greater Manchester
- West Lancashire Council: Policy could be improved by acknowledging and supporting the green infrastructure connections that exist and are proposed from Greater Manchester into surrounding areas,

Peak District National Park:

- In implementing this regard should be had to the Natural Character Area profiles published by Natural England and other evidence on green infrastructure.
- Due regard to the statutory purposes of National Park designation should also be an integral part of a green infrastructure approach It should be clear and evident what regard has been had to the National Park and, presently, the Plan does not make this clear.

North and North Wales Canal and Rivers Trust:

- Wish to see the title of the policy and reference to green infrastructure within the policy expanded to Green and Blue Infrastructure to better reflect the diverse nature of the infrastructure being referenced.
- Reference should be expanded to also acknowledge the wider economic benefits that can be derived from green and blue infrastructure and its role in creating sustainable economic growth and should also cross reference the wider thematic policies contained in the plan such as resilience, carbon emissions etc. associated with green and blue infrastructure.
- It is also considered that there should be a new, separate diagram showing the main network of blue infrastructure across Greater Manchester.

Tameside Green Party:

- Allotments should be included as part of green infrastructure, contributing to all of the suggested elements of sustainable development listed above.
- We suggest that the local Wildlife Trusts are consulted in ensuring all developments maximise biodiversity and support wildlife.

[Peel:](#)

- Supports the objectives of the Policy but the phase "all practicable" is onerous and should be replaced with "proportionate".

[CPRE:](#)

- Supportive of Policy but it should set ambitious targets, in balance with those for jobs and housing, public footpaths should not be restricted.
- Agricultural land should be mentioned and local food production should be promoted.
- We disagree with the assertion that less green infrastructure will mean more benefit in the future. Improvements to pre-existing green infrastructure should in particular benefit the local community impacted by new development.
- Policy GM7.7 must refer specifically to the cooling effect of trees in the urban environment.

[National Trust:](#)

- Concerned that there is no clear mechanism by which large scale improvements to green infrastructure will be made, and that without this, the scale of development will put significant pressure on existing green infrastructure,
- The policy needs to set out a clear baseline and targets if it is to be effectively monitored. As a minimum targets should be included relating to: habitat and species connectivity water quality air quality access to green infrastructure
- GMSF should also commit to: mapping and improving Priority Habitat Opportunity Areas, no net loss of Ancient Woodland, no net loss of peatland habitats, no net loss of any habitat where this is attributable to plan outcomes
- Include reference to no species to become extinct within the Plan area as a result of outcomes attributable to the Plan
- We would like to see this developer obligation strengthened. Particularly as green infrastructure is likely to be lost due to new development.
- Cross reference and integration is needed between this policy and GM27 Infrastructure

[Cheshire Wildlife Trust:](#)

- Green infrastructure has a dual role for biodiversity and for people however the introduction to policy GM7 fails to reflect this dual role by omitting referencing biodiversity. This should be reworded.

[The Association of Bolton Allotment Societies, The Salford Allotment federation and Stockport Allotments Association:](#)

- Concerned that due consideration is given to the provision of local growing spaces within development and housing plans produced by our local authorities, that viable, valuable allotment sites are not sacrificed to housing development. We Support the National Allotment Society's initiative that 5,000 square metres of additional growing space (allotments) should be provided for each 1000 new dwellings built. Such provision could /

should be funded by the developers wherever possible and the space provided should be managed either by the appropriate Council or by a self-managing allotment society.

Trans Pennine Trail:

- Green infrastructure and active travel should be encouraged as part of the strategy. School and Employment travel plans should incorporate the use of sustainable travel and green infrastructure. Opportunities should be sought to upgrade the Trans Pennine Trail route for all users of all abilities.

Wildfowl and Wetland Trust:

- We support the approach. Targets should be based on ecological need, natural thresholds and potential for cost-effective ecosystem service enhancement.
- The plan should better articulate the links between the policies on green infrastructure (GM7) with other policies for instance the policy on flooding (GM18). Sustainable drainage systems can be important green infrastructure elements and can be especially important for providing small areas of habitat in urban environments.
- We recommend inserting a statement that green infrastructure is to be included within development design from the outset of the master planning stage.
- Recommend setting out quantitative and qualitative targets for green (and blue) infrastructure within the city.

Leigh Ornithological Society:

- The list of strategic Elements should also include grasslands, moss land and farmland. Farmland is an area where the decline of many protected birds is a most marked. It also provides food for the UK's growing population. Grasslands should be retained without additional plantings as these areas are the habitat for ground nesting birds Public access should be provided to these areas where species will not be disturbed.
- Section 10 should identify species which are under threat and protect amber-listed species, as well as red-listed., why they are important and which are the most vulnerable.
- Wildlife corridors need to be identified and be of an appropriate size, with reasons given as to why they have been chosen.

GM Cycling Campaign:

- Approve of this policy in general. The policy should include a commitment not to take productive agricultural land. Past experience has shown that loss of quantity of green infrastructure has not been offset by improvements in quality and effectiveness of the remaining green infrastructure.
- British Horse Society: Any access provided for walking and cycling should be accessible for equestrian use as well.
- Peak and Northern Footpaths Society: welcome the commitments to providing improved public access to open spaces. In particular steps should be taken to ensure that public access

to open spaces is as of right (e.g. definitive public rights of way and access land) and not merely concessionary and ensures the creation of a network.

- Manchester Climate Change Agency: include ~micro, small and medium-scale urban GI collectively as one of six strategic elements.

GM Directors of Public Health:

- It should be strengthened by including a reference to the necessity of green space for health and wellbeing as well as growth.
- It should be recognised that trees can have a negative effect on street ventilation. Need to specifically state the need to use porous surfacing wherever possible to contribute to sustainable drainage, and the value of trees and other greenery in reducing run off.
- Bolton and District Civic Trust: Green infrastructure must be promoted as an integral part of development. The GMSF and green infrastructure must be informed by a high level of ecological network planning across the whole of Greater Manchester.
- One respondent commented that the proposed policy approach de-valued the whole concept of green infrastructure by treating it as an afterthought to mitigate the impact of proposed development of existing biodiversity assets. In addition an inherent conflict was identified in policies that, on the one hand, proposed supporting green infrastructure and high quality ecological assets at the same time as proposing the removal or fragmentation of large areas of biodiverse green belt.

Nature Conservation (GM8)

Who Responded

There were 103 submissions to this section. These were from 59 individuals, and 25 organisations:

- ABAS
- Action Against Astley Road Development (AAARD)
- Bolton Friends of the Earth
- Cheshire Wildlife Trust
- Denton South Neighbourhood Plan
- Environment Agency
- Frederic Robinsons Limited
- Friends of the Earth
- Gatley Hill Allotment Society
- Greater Manchester Cycling Campaign
- Greater Manchester Directors of Public Health
- Lancashire Wildlife Trust
- Leigh Ornithological Society
- Manchester Climate Change Agency
- National Trans Pennine Trail Office
- Natural England
- Newboult Road allotments Association

- Peak and Northern Footpaths Society
- Peel Group
- Saddleworth Parish Council
- The Campaign to Protect Rural England, Friends of the Peak District & The NW Transport Roundtable (single submission)
- The Land Trust
- Wildfowl and Wetland Trust

Summary of Issues Raised

- Many comments support the policy
- All developments should provide a net improvement in biodiversity value wherever practicable.
- The Policy needs to be policed, with long term plans established and monitored alongside penalties where developments do not provide a net improvement in biodiversity value.
- Many comments have concerns that with development of Green Belt sites this policy will not protect nature conservation for future generations. Many of the site allocations would fragment and sever connectivity between habitats as well as leading to the direct loss of habitats, species and biodiversity over an extensive area.
- Several allocations have potential to impact on statutory designated sites, and the potential for impact on these areas has not been considered. Legislation places a duty on local authorities to protect wildlife and habitats.
- Developments that result in a loss of SBI should not be allowed.
- There is no mention of SSSI sites and how these will be protected
- Unrealistic to expect to find the same levels of biodiversity in many gardens as you would find in the habitats that will be destroyed by the Allocations.
- More imaginative creation and adaptation is required on existing and new buildings e.g. providing hedges instead of fences etc.
- The policy seems to be more about creating new green spaces rather than protecting and enhancing what already exists. Once disturbed existing wildlife is unlikely to return.
- The impact of development and its knock on effect on nature conservation to the wider area is underestimated.
- In rural areas stepping stones should be insisted upon to enable species movement between green areas.
- Hope that conservation will not just be providing lip-service as nature conservation is rarely a priority in developing areas for housing.
- Areas designated for nature conservation should not be undermined by the inclusion of land which is not of high value in terms of biodiversity and/or ecological importance, and

opportunities should be taken to respond to up-to-date site circumstances and opportunities to provide habitats of higher ecological value in new locations.

- In the case of wildlife corridors the reports states little other than the fact that rivers are very important. They are important for certain species e.g. Kingfishers.
- Saying that a loss of some of the green infrastructure will be more than offset by improvements in the remaining area will only be the case if it happens in the same approximate area.

Lancashire wildlife Trust and Cheshire Wildlife Trust:

- The aim of the policy should be more challenging. It should create, as an integral part of the GMSF, a fully functioning mapped ecological network with much better connectivity; with the benefits of existing habitats recognised and maintained or restored, together with new habitats created.
- In terms of the thematic Environmental Policies there should be quantitative and qualitative targets that would enable monitoring of the delivery and effectiveness of these policies.
- An integrated environmental, social and economic case for Green Infrastructure, linking environmental enhancement to human health and to economic growth is needed within all the policies.
- A defensible system of biodiversity metrics should be established that would quantify both the extent and scale of any losses to the ecological network(s) and weigh these against measures to deliver gains in quantity, quality and functionality with no net loss. It should endorsed by the LNP boards of neighbouring regions and there should be wide partnership buy-in especially from delivery partners (such as the Wildlife Trusts).
- Criteria must reference Priority species/habitats and Nature Improvement Areas in addition to designated sites.
- Some wording changes suggested.
- GM Directors of Public Health: There could be greater recognition of the strategic links in para 11.0.1 to the Natural Health Service and the Nature Partnership, and GM Natural Capital Group.
- The Land Trust: Important to highlight the role of management and how it will be provided. It is also important to cross reference the social, economic and health benefits that conservation and biodiversity brings and to refer to the nature deficit disorder and ecosystem services. Also important to consider existing brownfield sites as already and potential green space. It may already host valuable biodiversity
- Lancashire Badger Group: Developments should consider the location of badgers and carry out surveys at the right time of year

Campaign for the Protection of Rural England:

- Agrees that a high value ecological network across Greater Manchester should be secured by the Framework.

- The GMSF needs ambitious targets for nature conservation to be assessed against as new development is brought forward.
- When considering wildlife corridors wording should say these should be no less than 500m wide where ever possible (regional) or 300m wide (sub-regional). Alternatively the Policy could include criteria such as, 75% of all corridors should be of a width no less than 500m, with a further 25% no less than 300m.
- Planning applications near to wildlife corridor should not harm or restrict the movement of wildlife. Consideration should be made to restrictions in building height on properties, light pollution, fragmentation of habitat (worsened by the new central reservation design on smart motorways).
- Potential solution should be explored such as to incorporate wildlife bridges to allow connections between habitats whilst significantly reducing collisions between animals and humans.
- Encourage the West Pennine Moors to become a Nature Improvement Area (NIA) in the future.

Wildfowl and Wetland Trust:

- This policy would be improved by including reference to the importance of retaining valuable remnant natural habitats, incorporating them into development design.
- Mitigation hierarchy should be reiterated within the GMSF, considering dedicated guidance.
- Important to retain pre-development habitat within a development site where possible. Offsetting is only considered as a last resort and only then if the benefits outweigh the costs (taking an ecosystem services approach to cost benefit)
- Analysis of costs and benefits should include analysis of the changes to ecosystem services. There may be many more costs than simply biodiversity loss e.g. flood risk and water quality e.g. biodiversity of green space is affected by the quality of that space, the management of that space and pollution.
- All policies and strategies should require a preference for native species and to ensure that invasive non-native species are not planted/ removed if found on site prior to development.
- Support the policies on green infrastructure and nature conservation and recommend setting out quantitative and qualitative targets for green (and blue) infrastructure within the city.
- Friends of the Earth: Vital environmental protections of species and habitats are not present in this plan.
- North & North Wales Canal & River Trust: Designated sites such as canals fulfil functions other than nature conservation and these should be reflected in the policy.

National Trust:

- The policy needs clear targets to enable effective delivery and monitoring. ‘Wherever practicable’ weakens the commitment to no net loss of habitats; this should be strengthened. The criteria for allowing damaging development are weak.
- The requirement should be for socio-economic benefits to significantly outweigh adverse impacts and the bar should be set very high for designated sites and priority habitats.
- GMSF should also commit to: mapping and improving Priority Habitat Opportunity Areas no net loss of Ancient Woodland no net loss of peatland habitats no net loss of any habitat where this is attributable to plan outcomes no species to become extinct within the Plan area as a result of outcomes attributable to the Plan
- Consideration should be given to a strategic CIL which would enable a more coherent approach to landscape management and possible biodiversity offsetting.
- Clarification is needed about where and what the priority habitats and species are and how they will be monitored.

Environment Agency:

- Recommend the following additional wording: “Improving connections between habitats, to protect and improve the provision of corridors and stepping stones that enable the movement of species, especially as the climate changes.”
- Support the reference to tackling invasive species.
- Where there is reference to providing new habitat we recommend this is strengthened to refer to provision of high quality green and blue infrastructure which integrates with existing habitats to avoid further fragmentation.
- Larger schemes should also have an ambition to achieve major environmental enhancements (not just for nesting birds / roosting bats) to create high quality green infrastructure / resilient ecological networks for the future.

Natural England:

- Policy does not clearly define priority habitat and species
- Welcome the four key elements in the ecological network.
- GM8 should include criteria for the protection and enhancement of National and European designated sites.
- In its current format Policy GM8 fails to clearly demonstrate a strategic policy that aims to achieve a net gain for nature spatially as per the NPPF (paragraph 9).
- Additional wording should be added that explains how each district are going to implement this policy
- The Policy should be closely aligned with the NPPF para 18

- Not clear that the GMSF fully reflects biodiversity at a landscape scale. Would like to see an overarching commitment in the GMSF for the ten district authorities to map assets and highlight areas for enhancement in their Local Plans.
- It is not considered the Development Management component of GM8 is NPPF compliant.
- Welcome the inclusion of policies that demonstrate the functions of the mitigation hierarchy.
- Currently not compliant with NPPF as does not include policies that demonstrate the use of alternative sites where significant harm from development can be avoided.
- Would like to see further clarification around the levels of compensation in Part B.
- Advise that commitments to ensuring no net loss for biodiversity within the plan should be clearer in the supporting text, and to provide net gains where possible.
- It is not clear that GM8 represents a clear strategy for environmental protection and enhancement
- Work should be undertaken with the wider partners to identify priority species and to use this data to re-enforce the proposed networks identifying gaps in the current networks and habitat distribution and therefore, clear potential enhancement areas to these networks.
- The current networks as described do not allow for adequate species movement, or show areas which would be crucial to retain/enhance in light of development pressures and impacts
- The plan does not identify land where development would be inappropriate (NPPF para 157).
- GM8 does not encourage the use of brownfield sites
- Propose a separate landscape policy in line with NPPF, para 117. GMSF does not entirely achieve the landscape scale approach principle high grade soils and the best most versatile land should be avoided for development.
- In line with NPPF GMSF should set out a clear strategy for NIAs and consider specifying types of development appropriate in NIA
- Like to see a policy added to the GMSF on light pollution. This has a negative impact on local amenity, intrinsically dark landscapes and nature conservation.

Trees and Woodlands (GM9)

Who Responded

There were 28 submissions to this section. These were from 16 individuals and 12 organisations:

- Environment Agency
- Forestry Commission
- Friends of the Earth
- Greater Manchester Cycling Campaign

- Greater Manchester Directors of Public Health
- Greater Manchester Forests Partnership
- Manchester Climate Change Agency
- Natural England
- Saddleworth Parish Council
- The Campaign to Protect Rural England, Friends of the Peak District & The NW Transport Roundtable
- The Land Trust
- Woodland Trust

Summary of Issues Raised

General support for the policy from residents and organisations stating the benefit of trees in terms of overcoming pollution and improving surface water runoff and natural flood management.

There should be a commitment for all trees removed to be replaced at a proposed rate of 2-1 as a minimum.

The policy should allow for some offsetting where wider benefits can be demonstrated.

Concern that existing trees do not get damaged/traumatised during the construction of the new developments.

Ensure that ecological networks for woodland are maintained, restored, recreated and created without compromising stronger ecological networks for wetland, grassland and other open habitat ecological networks.

The policy should also recognise the benefits of natural regeneration of woodland: and be explicit in its protection of ancient woodland habitat.

Natural England: Should include a specific policy for the protection of Ancient Woodland, aged or veteran trees. GMSF does not fully reflect NPPF para 118.

Cheshire Wildlife Trust: This policy must ensure that tree planting is not undertaken on areas currently of high ecological value and there should be specific reference to the protection, restoration and buffering of existing woodland, particularly ancient woodland.

National Trust: Delivery of GM9 needs to align with GM8 to ensure woodland does not outweigh other habitats. A commitment to no net loss of Ancient Woodland and no net loss of peatland habitats should be included.

Manchester Climate Change Agency: Recommend that a seventh priority on the management of trees and woodlands for carbon storage/sequestration is added.

The Environment Agency:

- Priority 6 - We recommend reference to positive management either as additional wording or replacing the wording of a more productive state. This will achieve multiple Green Infrastructure benefits and ecosystem services not least flood risk.
- Where there is planting, this could be utilised to actively manage the quantity and quality of SW runoff

Forestry Commission:

- Consider highlighting the need to spatially target woodland creation/tree planting to areas of greatest need; areas where the functionality you want e.g. flood risk mitigation or water quality or ambiance for growth is most needed. Otherwise you could end-up with a lot of diffuse outputs/outcomes
- Need to retain woodland and trees for wildlife and to help overcome pollution issues,

GM Directors of Public Health:

- The establishment of community orchards and other publicly available fruit trees to increase the consumption of fruit.
- How will the policy work when it is likely many trees will be lost as part of developments?

CPRE:

- Consider an ambitious target for tree planting is needed as with the loss of Green Belt it is difficult to see how the policy can meet the ambition of having more trees. Strategic planting of trees is required to achieve flood risk management and to filter air pollution along corridors that are worse affected by poor air quality.
- Concern over the loss of trees to development and in particular how can trees of historic, cultural or aesthetic value be conserved?
- There is a need to "improve public access" to woodland
- Policy should recognise the benefits of natural regeneration.
- TPO procedures must be more accessible for the public.
- Policy must ensure that tree planting is not undertaken on areas currently of high ecological value.
- Should be specific reference to the protection, restoration and buffering of existing woodland, particularly ancient woodland. A commitment to no net loss of Ancient Woodland should be included.
- Important to identify the long term maintenance of trees and woodland, and how funding will be allocated / put in place.
- Should be some flexibility in terms of the loss of some trees/woodland as it is inevitable some will be lost. The policy should allow for some offsetting where wider benefits can be demonstrated.
- Where will new trees be planted when the Green Belt is released?

City of Trees:

- Suggest that recognition is given of the need to plant new trees and woodlands where they are most needed. We believe that a GM Tree and Woodland Strategy with targets influenced by the findings of a GM i-Tree Eco assessment should be undertaken. This document would then form the reference for tree planting targets associated with/ assigned to new developments.

- Concern over loss of urban trees in the context of development pressure.

Woodland Trust:

- Strongly support the policy.
- Would like to see all the local authorities in Greater Manchester work towards the aspiration of planting a tree for every person in Greater Manchester over the next 25 years. Would like to see the plan refer to the contribution which woodland in Greater Manchester can make towards a wider network of trees and woods across the north of England.
- Woodland creation and management opportunities within Greater Manchester should be supported to deliver such benefits as part of a wider collaborative programme with other adjacent authorities and in relevant catchments.
- Also support the aim of relinking fragmented areas of woodland, as this will help make the woodland more resilient to external threats such as climate change.
- Ancient woods are irreplaceable we would like to see ancient woodland protected from development in all but the most wholly exceptional circumstances.

The Uplands (GM10)

Who Responded

- There were 19 submissions to this section. These were from six individuals and 15 organisations:
 - Environment Agency
 - Forestry Commission
 - Friends of the Earth
 - Greater Manchester Cycling Campaign
 - Greater Manchester Directors of Public Health
 - Historic England
 - Manchester Climate Change Agency
 - Natural England
 - Peel Group
 - Saddleworth Parish Council
 - The Campaign to Protect Rural England, Friends of the Peak District & The NW Transport Roundtable (single submission)
 - The Land Trust
 - Worsley Civic Trust and Amenity Society

Summary of Issues Raised

- General support for the policy and the recognition of the Uplands in the GMSF.
- Comment stating that the Pennines, including some areas in Greater Manchester, bring a significant number of visitors to the area with accompanying economic benefits. Over development on the eastern side of Manchester could ruin the views from these uplands, which could have a negative impact on visitor numbers.

- The Forestry Commission: It would be worth considering the wider socio-economic needs required from the uplands over the next 25 years, especially their recreational functionality. The Natural Capital Committee's 2nd report is interesting in this respect.
- Greater Manchester Directors of Public Health: Strongly support policy GM10 and consider that Moorland rambling opportunities and outside activity are important to health and wellbeing.
- The Land Trust: Consideration needs to be given to the value that these areas / spaces have to the economy and society. Natural capital accounting is one method of identifying such value. They also consider that it is vital to identify the long term funding solutions to manage and maintain these assets.
- Several comments stated their support for the policy but considered that the aims of the policy could not be achieved alongside the scale of development proposed.
- The uplands are of great heritage value and people should have the right to roam.
- The uplands should be protected from any further windfarm development. There are already a number around Rochdale.
- The Environment Agency: Supports the policy aims to significantly restore and extend areas of blanket bog. The recent 'Moors for Future' project has shown demonstrable multiple environmental benefits of moorland restoration and the EA would welcome opportunities to explore and expand such restoration works within the south and west Pennine Moors areas.

Campaign to Protect Rural England:

- Extending areas of blanket bog through the protection of existing areas and the restoration of degraded areas will enhance the full range of moorland habitats.
- Proper upland targets are required to be able to show progress as new development is brought forward.
- A policy of restricting Green Belt loss in Upland areas should be promoted as well as a restriction on wind turbines in landscape sensitive areas.
- Agree with the aim of strengthening the upland landscape character in accordance with Natural England's 'Natural Character Profiles'. There are huge benefits from habitat restoration, limiting carbon emissions and reducing flood risk of the wider catchment downstream.
- Habitats should be restored to protect peat and land uses controlled. Drainage is also important in the uplands and prehistoric remains should be protected.
- Manchester Climate Change Agency welcome the policy and its recognition of the important role of the uplands as part of GM flood risk management and CO₂ reduction strategies.
- Steady State Manchester welcome the recognition of the contribution of the uplands, however they believe the policy is weak and vague and there is a risk it will fall by the wayside under economic pressures.

Natural England:

- The policy needs further detail to fully reflect the diversity of habitats, wildlife and ecosystem services.
- The second priority focuses on moorland habitats specifically, Natural England would prefer that it reflected the full range of upland habitats – meadows, pastures, native woods, blanket bog and healthy watercourses.
- Flood risk management is downplayed in this section, the policy would benefit from discussion of the role played by the upland catchments and the importance of blanket bogs for water storage.
- Water quality should be discussed in this section and the cost of removing eroded organic matter from the water supply.
- Rossendale Council welcome the acknowledgement of the uplands, the importance of blanket bog and upland meadows, and the acknowledgement that they extend into Lancashire. However, they comment that the importance of cross boundary delivery should be promoted and they believe it is key to maintaining and improving such areas.
- Historic England: Support the inclusion of a specific policy for the uplands. However, they believe the policy should respond to the view expressed in paragraph 13.0.4 of the reasoned justification that the historic environment is an important element of the upland areas.
- Cheshire Wildlife Trust: The uplands evidence based Ecological Network mapping must underpin this policy and as such cross reference to Policy GM8 should be made.

Lancashire Wildlife Trust:

- The West Pennine Moors area, recently designated a SSSI (likely to be confirmed in March 2017), and the South Pennine Moors area SSSI, SAC and SPA should be specifically referred to in the reasoned justification.
- Recommend that the Uplands Landscape Scale Natural Asset (Fig 2.1) be identified as an area of search for the identification of further Nature Improvement Areas.
- Quantitative and qualitative targets would enable monitoring of the delivery and effectiveness of this policy.
- Ramsbottom Heritage Society: The uplands are a key backdrop to the Ramsbottom area, point 3 is important and should be considered in relation to planning applications in the area.

Greater Manchester Forests Partnership and City of Trees:

- The Clough Woodlands should be included as part of the range of moorland habitats. They are an important landscape feature, help support wildlife populations and provide the natural connection between the moorlands and lowlands.
- Supports the policy, but concerned about its implementation. Policies like this are often ignored in the interests of building more houses.

The Lowland Wetlands (GM11)

Who Responded

There were 12 submissions to this section. These were from two individuals and 12 organisations:

- Environment Agency
- Friends of the Earth
- Greater Manchester Cycling Campaign
- Greater Manchester Directors of Public Health
- Historic England
- Manchester Climate Change Agency
- Natural England
- Peel Group
- The Campaign to Protect Rural England, Friends of the Peak District & The NW Transport Roundtable
- The Land Trust

Summary of Issues Raised

- General support for the policy. Many comments focus on the area that the policy covers and the importance of Chat Moss. Comments also relate to the Great Manchester Nature Improvement Area. Some detailed comments relate to the policy wording and the need for the policy to be strengthened in places.
- The policy should identify ambitious green infrastructure targets to enable evaluation and monitoring as new developments are permitted
- Culcheth & Glazebury Parish Council, Greater Manchester Cycling Campaign and Greater Manchester Directors of Public Health support the protection of lowland wetlands.
- Steady State Manchester welcome recognition of the wetlands in a policy. However, they feel that the current policy is too weak and vague. To strengthen the framework there needs to be appropriate carbon metrics identified for the carbon transactions in these areas. This needs to be put alongside the same calculations for the present Green Belt and the impacts of reductions in green area quantified properly.

Natural England:

- Suggest that the policy should include criteria for the protection and enhancement of national and European designated sites.
- There is currently insufficient information explaining what ‘hydrological buffer zones’ will involve and how they will work in practice. Further detail is also needed on the implications of this approach on surrounding habitats and land use.
- The characteristics of Wigan flashes does not include breeding birds as a feature of the wetland habitat.

- A map of the Nature Improvement Area (NIA) should be included and further information should be added on what would be deemed appropriate or inappropriate development within the wider area.

[Historic England:](#)

- Support the inclusion of a specific policy for the lowland wetland areas of Greater Manchester.
- Bullet 1 –the policy should be further enhanced by acknowledging the need to undertake the appropriate measures and investigations prior to any restoration and management of these areas. Many peat areas overlay and protect prehistoric occupation and activity sites. Any proposals to develop peat or moss land should trigger consultation with Greater Manchester Historic Environment Record and archaeological adviser at the earliest opportunity.
- Bullet 4 – welcome reference to industrial and mining heritage, but do not consider that the policy goes far enough to ensure that other elements of the historic environment and heritage asset types are recognised and appropriately managed.
- The reasoned justification that accompanies the policy should be amended to reflect the policy in terms of reference to archaeology and the historic environment, in particular peat and mossland.

[Cheshire Wildlife Trust](#) advises that evidence based Ecological Network mapping must underpin this policy, and as such cross references should be made to Policy GM8 – Nature Conservation.

[Lancashire Wildlife Trust:](#)

- Welcome the broad thrust of the policy. There should either be specific mention of the Greater Manchester Wetlands Nature Improvement Area in the policy text, or a separate thematic policy on Nature Improvement Areas.
- Consider that a locations specific reference only to ‘Wigan Greenheart’ which lies within just a part of the North West area of the NIA, is potentially misleading.
- Quantitative and qualitative targets would enable monitoring of the delivery and effectiveness of this policy.
- In the first paragraph of the reasoned justification, the ‘Great Manchester Wetlands Nature Improvement Area’ is erroneously called the ‘Greater Manchester Wetlands Nature Improvement Area’.
- Grasslands are given no prominence in the policy. They provide important habitats for nesting red list bird species in alarming decline.
- Consider that the policy should be extended beyond Chat Moss to Bedford and Astley Mosses.

[Peel Group:](#) Supportive of the aims of the Lowland Wetlands policy but consider that clarification is needed about the area GM11 applies to. The ‘Key Diagram’ is somewhat unclear regarding the extent of the area. Assume that the policy applies to the eastern mossland area of Chat Moss; this

land currently has no public access and there are no proposals to deliver the objectives of the policy. Peel consider that the policy is undeliverable in the eastern part of the mossland area of Chat Moss and it is therefore unsound. Further engagement is needed with major landowner

The Environment Agency (EA): Support the restoration of the lowland wetlands, but feel that the current policy focuses too much on the NIA. The policy should be expanded to other local authorities and river catchment areas (rather than just the West of GM), such as the River Mersey and Irwell where enhanced wetlands can be achieved. Recommend the following additional priority: “*Creation or expansion of natural floodplain or priority wetland habitat across GM*”. Also recommend additional wording in paragraph 14.0.4 to say ‘*there is an added benefit of ensuring habitats, and the species they support*’ are themselves resilient to a changing climate.

Campaign to Protect Rural England (CPRE):

- CPRE believe a policy of restricting Green Belt loss in lowland wetland areas should be promoted.
- Chat Moss is of international significance and must be protected by hydrological buffer zones and careful management and restoration of the water table.
- CPRE believes local community engagement and involvement is most important for lowland wetlands. This could help combat instances of anti-social behaviour.
- CPRE recommends that the GMSF should identify ambitious targets against GM11 to be able to show progress as new development is brought forward.

Manchester Friends of the Earth: welcome the proposal to designate 40,000 ha as the Greater Manchester Nature Improvement Area. They consider that the GMSF should include a policy preventing Green Belt loss in lowland wetland areas.

Manchester Climate Change Agency:

- Welcomes this policy and its recognition of the important role of the lowland wetlands as part of GM flood risk management and CO₂ reduction strategies.
- The Wetlands are relevant to many other policies in the GMSF including recreation, carbon emissions, resilience, flood risk, water quality, health and infrastructure. Wetlands can provide increased cooling affects, reduce flood risk, improve air quality and increase biodiversity. Wetlands can act as biodiversity hotspots within urban environments.

River Valleys and Canals (GM12)

Who Responded

There were 18 submissions to this section. These were from seven individuals and 13 organisations:

- Canal & River Trust
- Environment Agency
- Friends of the Earth
- Greater Manchester Cycling Campaign
- Greater Manchester Directors of Public Health
- Historic England

- Manchester Stockport Canal Society
- Natural England
- Peel Group
- Saddleworth Parish Council
- The Campaign to Protect Rural England, Friends of the Peak District & The NW Transport Roundtable

Summary of Issues Raised

Natural England:

- The policy should be strengthened with links to habitat quality and catchment management.
- It should also recognise the presence of European designated sites.
- A map of river valleys and canals would be useful
- Priority 7 and priority 10 of the policy overlap and should be combined.

Rossendale Council comment that the policy needs to support catchment wide initiatives like the 'Rivers Return Partnership' and cross boundary working in relation to this is key.

Historic England welcome the policy but consider the phrase 'where possible' in Bullet 5 is unhelpful. It does not provide clarity on when retention and enhancement might be desirable, nor does it bring about any additional planning control over development.

Cheshire Wildlife Trust comment that evidence based Ecological Network mapping must underpin this policy and as such cross reference to Policy GM8: Nature Conservation should be made.

Lancashire Wildlife Trust welcome the policy, particularly the second and seventh priorities. They suggest the use of quantitative and qualitative targets to enable monitoring of the delivery and effectiveness of the policy.

Ramsbottom Heritage Society report that there is already evidence of this policy being compromised. Consider that in order to protect river valleys and canals they should not be included as an open space element of any proposed planning application.

The National Trust comments that they are currently working with partners and stakeholders to create a long term catchment management plan for the River Bollin. They also own part of the upstream catchment of the River Irwell and therefore contribute to flood management and water quality.

Greater Manchester Cycling Campaign support the policy.

Greater Manchester Directors of Public Health strongly support the policy and comment that the river valleys are particularly important as green transport routes. They consider that the policy may benefit from some reference to the use of rivers and canals for transport.

Peel Land and Property support the use of the canals for economic purposes. They also note that the river valleys are not identified on the GMSF Key Diagram.

Manchester Stockport Canal Society would like the policy to also protect the Stockport arm of the Manchester Canal. Research has shown that the route could be an economically viable waterway and there is interest from United Utilities. Redevelopment could also bring benefits to the wider area.

Campaign to Protect Rural England (CPRE) supports the policy and makes the following detailed comments:

- Clough woodland merits special protection.
- Suggest the reintroduction of meanders to canalised rivers can provide a huge number of benefits.
- CPRE agree that the heritage, biodiversity and residential amenity values of such spaces should not be underestimated.
- Enabling safe access to river valleys and canals is a good idea.
- Any freight modal shift away from road based HGVs is welcomed by CPRE, particularly the protection of the line of the former Manchester, Bolton and Bury canal.
- New development should maximise the benefit of river frontages with high quality public realm and access to waterways.
- Targets need to be identified to help understand how the GMSF will improve and protect the river valleys and canals of Greater Manchester.

North and North Wales Canal and River Trust are generally supportive of the policy and the recognition given to blue infrastructure in the plan. They also make the following detailed comments:

- Concerned that the policy does not provide an appropriate strategic policy for canals or distinguish sufficiently an approach between river valleys and engineered waterways. They consider that this could be simply addressed by the creation of two separate policies.
- Comment that it is also critical to understand that waterways are operational and can be catalysts for urban regeneration. The Trust would therefore like to see a more balanced recognition of the value of waterways and the opportunities they present to help deliver the wider vision and objectives of the GMSF.
- The trust propose a new policy related to 'Canals, Reservoirs and Associated Infrastructure'.

The Environment Agency made the following detailed comments with a number of detailed wording changes, a summary of the main issues raised is set out below:

- Recommend an overarching vision for the policy.
- Detailed comments on the policy priorities, including reference to the NW River Basin Management Plan and Water Framework Directive. Also suggest additional priorities.
- Suggest there is a need to better reflect the important role of rivers and canals in regeneration initiatives.

Comments Received on 2016 GMSF Draft

- Important to reflect Water Framework Directive ambitions in the GMSF as the GMCA is a key partner on the Natural Course Project which has an early focus on the River Irwell.
- Currently the majority of water bodies in the Greater Manchester are failing in relation to the policy aims of the Water Framework Directive. Reference should be made in the GMSF to the need for developers to undertake an assessment of the impact of their proposals on waterbody status.
- Support the policy - the River Douglas and the Leeds-Liverpool Canal are part of the setting of Shevington.
- Concerned about the strength of the policy when compared with economic pressures.
- There is no specific mention of the Peak Forest or Macclesfield Canals, both of which are well used by locals and visitors.
- Comment suggesting additional mooring facilities could be provided as an alternative housing, both on the narrow canals and the Manchester Ship Canal.
- Comment suggesting a right of navigation on all rivers and canals for paddleboards and kayaks which could be used for personal commuting and social transportation.
- Request for additional rights of way that follow the rivers and canals to increase recreational and commuting walks and cycle routes.
- Comment stating that increasing access to canals and rivers will in some cases be inappropriate. For example, where improved access would impact on fragile areas such as ancient woodland or sensitive nature conservation sites.
- Improvements to canal towpaths tend to be disjointed, with some high quality improvements but other sections that are impassable in winter.
- The policy contradicts plans to build near Elton Reservoir.
- The reopening of the Stockport branch of the Ashton Canal is a viable option that would create a green corridor through Reddish and Gorton and provide an incentive for housing developments on brownfield sites along the route.

Recreation (GM14)

Who Responded

There were 27 submissions to this section. These were from 15 individuals and 13 organisations:

- Forestry Commission
- Frederic Robinsons Limited
- Friends of the Earth
- Greater Manchester Cycling Campaign
- Greater Manchester Directors of Public Health
- Heyford Developments Limited
- Natural England
- Peel Group

- Salford Allotment Federation
- The Campaign to Protect Rural England, Friends of the Peak District & The NW Transport Roundtable (single submission)
- The Land Trust

Summary of Issues Raised

Natural Environment

Greater Manchester Forests Partnership and City of Trees strongly support objective 2. City Forest Park will be a new major green tourist and recreational attraction for Greater Manchester and should be highlighted and given sufficient priority within GMSF.

Rossendale Council welcomes reference to the Irwell Sculpture Trail and consider this could be expanded to include other important cross boundary recreational routes including the National Cycle Route 6 and 'Valley of Stone' Greenway.

Lancashire Wildlife Trust support this draft policy as it promotes increased contact and connection with, and hence understanding of and empathy with the natural world - and our place within it. This is core to our own charitable objectives. Notwithstanding our general acceptance of the reasoned justification's statement that "*The appropriate level of provision will depend on local circumstances such as the type and scale of demand, and the availability of suitable land*" we do see a case for the adoption of Greater Manchester-wide *minimum* standards for access to natural green-space, at least; if only to avoid a "race to the finish" between districts competing for development. We suggest that something based on Natural England's "Access to Natural Green-space Standards" ("ANGSt") could provide a suitable model.

Natural England support the first point of Policy GM14 that provides a detailed set of guiding principles in the Draft GMSF. In its current format, we do not feel that the Recreation section of the Draft GMSF includes a robust and up-to-date evidence base, to be used to inform the opportunities for new recreation provision within GM. The Recreation section has not specified impacts from new developments, such as recreational disturbance from new housing that will need to be addressed. Would like to see further evidence that the policy is based on a robust and up to date assessment of open space. GM14 does not specify impacts from new developments, such as recreational disturbance from new housing. Not aware that Public Rights of Way (PRoW) have been fully considered in the GM14. Consider the benefit of PRoW to health and wellbeing.

Leisure

CPRE applauds the policy intention to provide a wide variety of recreation opportunities, including outdoors, to support a high quality of life promoting good health and the attractiveness of the region to visit. Delivering an accessible and integrated network of high quality green infrastructure across Greater Manchester is most important. All new housing developments should have adequate high quality provision of outdoor recreation space for the benefit of residential amenity.

There is concern from a number of residents that building on greenspaces will reduce the amount of places for leisure pursuits including cycling, walking, running and horse riding.

The British Horse Society would welcome working with local authorities and developers as and when schemes come forward for development to ensure that equestrian needs are taken into account in such developments.

Reference should be made to bridleways in the GMSF. It is vital that horse riders are able to access safe off-road riding.

Concern that once green spaces and recreation facilities are built on they are lost forever.

Paragraph 17.0.2: Open spaces and public parks are beneficial to well-being, happiness, physical health and mental health and should be protected.

[Accessibility](#)

The Greater Manchester Cycling Campaign would like to see 'should' in the final sentence replaced by 'must'. Otherwise, recreational provision may become an optional extra for developers and planners.

Can planning laws be updated so that all public developments must include facilities for cycle parking and that all new roads have sufficient space for cycling lanes etc.

[Development](#)

Heyford Developments Ltd affirms its support for community facilities to be incorporated into residential development. However, the policy should make it clear that this is a preference and not a mandatory requirement. The following amendment is recommended: Policy GM14 should be reworded to add subject to feasibility at the end of the sentence.

Frederic Robinsons Ltd - Promoted site (The Organ, Hollingworth) is not required for recreational use and can therefore be used for housing development. We therefore remain of the opinion that the site currently provides no amenity or recreation value to the local community, and its release for redevelopment will result in significant wider community gain. For these reasons, we would welcome the re-assessment of the site for a housing allocation as part of the on-going work on the Framework. Should permission be granted for a residential scheme at The Organ with the resultant investment in sports and recreation provision within the immediate local area, the scheme would further assist the Council in achieving the requirements.

Manchester Friends of the Earth support the intention outlined in policy GM14 and recommend all new housing development should have adequate high quality provision of outdoor recreation space.

A number of representations state that proposed building on greenspaces is doing the opposite of what the policy is saying.

[Allotments](#)

Reference to allotments should be made in the policy.

Salford Allotment Federation are recommending 20 Allotments are planned per 1000 households, this is in accordance with the National Allotment Society policy as against 15 per the 1968 Thorpe report. Can this be emphasised in any planning that takes place. The buildings that

you are estimating contain apartments of which there are no gardens at all and for several reasons we are advocating allotments including health issues.

Other

The GM Directors of Public Health believe this section could be strengthened by being made more tangible and with SMART targets attached.

The Forestry Commission suggest targeting and linking with GM's Health plan - linking with areas of high death/deprivation - encouraging active recreation amongst these communities/areas who need it.

One resident felt that the section is very light in detail and feels like an afterthought to the overall plan.

Bamford Green Belt Action Group recognises the importance of the GMSF but feel that there are fundamental flaws in policy GM14 Recreation.

It is important not to just think about designated locations, but to think about embedding green infrastructure within urban environments, so that it is available to all.

Carbon Emissions (GM15)

Who Responded

There were 35 submissions to this section. These were from 23 individuals and 13 organisations:

- Carbon Coop
- Environment Agency
- Friends of the Earth
- Greater Manchester Cycling Campaign
- Greater Manchester Directors of Public Health
- Heyford Developments Limited
- Manchester Climate Change Agency
- Natural England
- Peel Group
- SSE
- The Campaign to Protect Rural England, Friends of the Peak District & The NW Transport Roundtable (single submission)

Summary of Issues Raised

- Support for proposals to reduce carbon emissions.
- Agree need to focus on medium- and long-term goals in this area as well as short-term goals.
- There does not appear to be an appraisal of the adverse health effect of Nitrogen compounds, airborne particles, benzene rings and other aerosols associated with internal combustion engines.
- What about the sustainability of the proposed new buildings?

- Does not do enough regarding climate change, large scale renewable energy, integrated transport solutions.
- Additional housing, extra cars and expansion of Manchester airport in the proposals will increase carbon emissions.
- The proposals for industry and warehousing development alongside the M6 will create increased traffic flow along the M6.
- Take care with insisting on electric car use as things like fast charging will need an upgrade of supply from the ENW grid.
- Lobby the government to re-introduce benefits in the use of renewables.
- Using energy derived from fracking will result in GM increasing its carbon emissions manifold.
- The carbon reduction target of 60% by 2030 fails to reflect the ambition in the Paris Agreement to aim to keep the rise in global temperatures to below 1.5 degrees. A science-based target of at least 80% by 2030 should be adopted.
- In order to meet carbon reduction and air quality obligations, no new development should be permitted that would lead to an increase in carbon emissions and/or air pollution.
- Greater Manchester Cycling Campaign commented that the policy makes no mention of indirect carbon emissions, from e.g. consumption of goods manufactured and transported, overseas travel, computer server farms remote from the UK, emissions from people commuting into GM.
- Greater Manchester Directors of Public Health commented:
- Strongly support and welcome the GM15 policy.
- Note that many of the other policies support this chapter already, but more explicit reference to climate change could be made within some of them as suggested.
- There should also be explicit reference to the GM Air Quality Action Plan and Low Emissions Strategy.
- Would be good to see a Greater Manchester Supplementary Planning Document which requires new developments to meet the highest energy efficiency ratings that we can feasibly demand.
- Deliver heat networks utilising local waste heat where feasible
- Provide renewable generation in domestic and commercial developments Integrate active travel into the design of new developments or contribute to infrastructure via section 106 agreements.
- Provide infrastructure for ultra-low emissions vehicles and low emissions vehicles.
- Prioritise pedestrians and cyclist in the layout of new developments

- Where there are site limitations to meeting standards required by the GM SPD, developers could be required to make a Section 106 contribution to delivering appropriate infrastructure.
- Environment Agency commented:
 - It is not clear how effective this policy will be if there are no defined standards to be measured against. Reductions in carbon emission should also seek to apply this to whole life cycle.
 - Where developments are unable to achieve reductions should there be a role for carbon offsetting?
 - Existing Building Regulations require lower levels of energy use/carbon emissions but it is not clear on whether these are ambitious enough.
 - Work by the Zero Carbon Hub (ZCH) and other bodies have established that more demanding levels of energy efficiency can be achieved without significantly affecting the cost viability of a site.
 - Recommend additional reference to the cooling role of GI in terms of contribution to lower summer energy and cooling demand.
 - Note reference to particular opportunities for the use of decentralised heating and cooling networks within the Strategic Locations.
 - This policy needs to be embedded within the Strategic Location policies and additional text added to reflect this ambition.
 - Paragraph 2.0.5 There should also be aspiration (either low carbon, sustainable consumption) to make development sustainable as well as the locations. To ensure the policy sets the high level link through to wider GMSF policies we recommend the additional wording which is underlined: ‘Development will be managed to ensure that it is both functional and architecturally inspiring , efficient in its use of resources and makes a positive contribution to the quality of places and the wellbeing of people securing the reuse of brownfield land, protecting open spaces within the urban area, and delivering genuinely sustainable neighbourhoods with supporting facilities and services’.

Campaign to Protect Rural England, Friends of the Peak District and The NW Transport Roundtable commented:

- CPRE supports Policy GM15 on carbon emissions, but questions how it is possible to reduce Greater Manchester CO 2 emissions by 60% when so much new growth is planned in greenfield locations and so much expansion of aviation activities is being promoted.
- If spatial planning is to produce an absolute reduction in emissions then the CO 2 strategy of the new development needs to be quite significantly carbon negative, and therefore transformative for the whole of Greater Manchester.
- The GMSF must put more emphasis on the need for public transport networks.
- We completely agree that new development must accord with the energy hierarchy to manage a reduction in per capita energy consumption.
- Existing development should be retrofitted.

- More tree cover and an increase in habitats that sequester and store carbon are important and the GMSF policy must make an effective contribution in this regard.

Land and Planning Peel Group commented:

- Peel supports the objective of GM15 to reduce carbon emissions in GM.

SSE

- Agree with the Energy Hierarchy approach as described in point 3 of GM15.
- The opportunity, afforded by decentralised energy networks, to significantly reduce the carbon emissions of a large number of connected loads that heating and cooling networks provide should have a greater level of support within the spatial framework, especially within the strategic development locations.
- supportive of the GMCA setting a realistic target for the percentage of heat and power being provided from decentralised energy schemes as well as setting out a further hierarchy for the development and selection of energy systems in major new and redeveloped sites in these strategic areas to further encourage the installation of heating and cooling networks.

Carbon Coop

- Formally adopt the GM Housing Retrofit Strategy and 17kgCO₂/m².a target
- Support the implementation of programmes and projects for retrofitting the existing building stock, especially in those areas where fuel poverty is a significant issue;
- Support the delivery of renewable and low carbon energy schemes for all development but with particular opportunities for the use of decentralised heating and cooling networks in the strategic development locations.
- Heat Network developments should therefore only be allowed through planning where robust evidence of their effectiveness and net carbon emission reductions exists.
- It is essential that any future apartment development with car parking provision should also be required to include electric car charging provision for every space.
- The Plan should: require all new building to be zero-carbon with on-site renewable energy generation, propose no new major road building schemes or increases in motorway capacity no new fossil fuel extraction no new energy generation from combustion of fossil fuels or solid biomass constrain airport growth.

Manchester Climate Change Agency

- To increase the number of developments in GM, at the same time as reducing CO₂ emissions we need to move to new developments becoming net zero carbon, as quickly as possible. The current draft Policy GM15 both fails to recognise this challenge and the opportunity to address it. Recommendation: in consultation with industry and its development partners, GM develops and introduces an enforceable policy and guidance for all new developments to be net zero carbon from the early-2020s, exact date to be determined.

Natural England

- Point seven: what is meant by taking a 'strategic and area wide approach to reducing carbon emissions'? Given that the Draft GMSF policies have not shown

evidence of the demands for renewable/low carbon energy infrastructure, being accommodated into the capacity of the natural environment.

Barratt Homes

- As demonstrated through the scrapping of the Code for Sustainable Homes, the Government clearly views Building Regulations as the appropriate route to deliver reductions to carbon emissions in built development.
- The policy is not sufficiently clear as to what is actually required of specific developments, and what the implications may be for development that does not comply. It is also apparent that the viability of delivering the proposed requirements of this policy has not been assessed, alongside other key factors such as likely CIL and Section 106 contributions to deliver new infrastructure.

Church Commissioners

- On the whole the Commissioners support the need to reduce carbon emissions in Greater Manchester.
- The key in achieving this is creating an appropriate balance between incorporating such measures but providing a degree of flexibility and ensuring the measures proposed are not onerous for land owners or developers.
- Policy GM15 does not achieve this balance sufficiently and so can be regarded as unsound on the basis of being ineffective and not positively planned.
- In particular we regard Criterion 4 as being onerous.
- Carbon emission reductions are better addressed through building regulations.
- Recommend that Criterion 4 and 7 (which covers areas of renewable energy, low carbon schemes and decentralised heating and cooling networks) should be deleted from Policy GM15.

Highways England

- Welcomes the policy reduction in car use will also reduce the number of vehicles using the SRN Policy could reference Travel Planning although recognised that this is referred to in GM17

National Trust

- Welcome commitment to reduce carbon emissions and the recognition in point 6 of the role that the natural environment plays in delivering this.

Great Places Housing Group

- We support the need to invest in measures to reduce GM's carbon emissions and would welcome more local renewable energy initiatives. We feel this chapter could also benefit from the inclusion of how measures could improve residents' quality of life, for example, by reducing the impact of fuel poverty and improving residents' health.

Bolton Friends of the Earth

- The target for a reduction of carbon emissions is welcomed but there is a need for interim targets on which the GMSF should report annually. We would also welcome a push to increase the target to the advised 80% reduction by 2030. We welcome

the imposition of the energy hierarchy and carbon emissions assessments of new developments but on-site renewable energy generation should be required rather than supported.

Manchester Friends of the Earth

- The GMCA needs to develop a clear strategy to address the carbon emissions from both ground operations and flights at Manchester Airport. Airport growth should also be constrained such that emissions from flights do not exceed current levels
- The GMSF should ensure that all new buildings are zero-carbon with onsite renewable energy generation, there is no new major road building schemes or increase in motorway capacity and no new fossil fuel extraction or energy generation from fossil fuels.

Bury Green Party

- Contradictory aims to grow the economy by 2.5% year on year whilst claiming to adhere to the UK's commitment to the Paris Climate Change Agreement, aim to actively reduce carbon output, improve air quality and protecting our valuable natural environment. We believe that a health impact assessment ought to be carried out with some urgency and its outcome be seriously taken into account in the final Publication.

Jonathan Reynolds MP

- I am also keen that the Spatial Framework reflects my desire to see all new homes built be as energy efficient as possible
- Support the aspiration to deliver renewable and low carbon energy, but this should be subject to viability considerations.
- It is important to ensure that this aspiration is compliant with paragraph 009 of the Planning Practice Guidance which outlines that local planning authorities should set standards for a building's sustainability in line with the Government's zero carbon building policy and nationally prescribed standards.
- It is therefore recommended that Policy GM15 is amended to read: 'Support the delivery of renewable and low carbon energy schemes for all development, subject to viability and in accordance with the appropriate nationally prescribed standards'.

Resilience (GM16)

Who Responded

There were 13 submissions to this section. These were from three individuals and 12 organisations:

- Environment Agency
- First Choice Homes Oldham
- Friends of the Earth
- Greater Manchester Cycling Campaign
- Greater Manchester Directors of Public Health
- Manchester Climate Change Agency
- Natural England

- Peel Group
- Rochdale Boroughwide Housing
- The Campaign to Protect Rural England, Friends of the Peak District & The NW Transport Roundtable (single submission)

Summary of Issues Raised

- Not convinced that the issues are taken seriously enough, problems such as increased air conditioning use in the summer, there is little evidence that these issues have been considered in depth.
- Resilience to climate change is not considered.
- Policy GM16 aims to open up rivers and increase green infrastructure, especially trees, to minimise flood risk proposals will remove trees and create impermeable surfaces which would increase flood risk.
- This is a wish list - no evidence that this can be delivered, especially with austerity in the public sector.

Building Research Establishment (BRE)

BRE has recently developed a sister scheme to BREEAM titled SABRE (Security Assurance by BRE), which applies a similar methodology to new construction projects but focussing on security. SABRE was developed to fill a long-standing gap in the industry. We believe the targeted use of SABRE can assist with the framework objective of maximising the resilience of new development in Greater Manchester and would like to assist you further with any inclusion of SABRE in future policies resulting from this consultation.

Lancashire Wildlife Trust

This policy is welcomed, particularly welcome achievement mechanisms #4 and #5. Quantitative and qualitative targets for these should be included to enable monitoring of the delivery and effectiveness of these aspects of this policy.

Environment Agency

Paragraph 2.0.5 Current and future climate resilience is also an important factor to consider when ensuring development is sustainable for its lifetime. We recommend inclusion of the following wording at the end of the first sentence: "*and are the most resilient to current and future climate and other risks*".

We welcome the inclusion of this policy for the GMSF. Bullet point 5: There is an added benefit of ensuring habitats, and the species they support are themselves resilient to a changing climate. This supports their ability to deliver other climate services which are essential to delivering of the GMSF and its vision. To support this we would recommend that additional wording at the end of this section: to also ensure this continues to provide GM with vital climate protection.

Barratt Homes

Policy GM16 Resilience 10.1 It is not clear what the role or purpose of this policy is within the development plan, or how it would be applied to development proposals. The policy is also

imprecise, and contains a number of elements which are covered by other policies (for example flood risk and design). In our view the policy is unnecessary, and should be deleted.

Harworth Estates

Support the commitment that GM will be highly resilient, and that citizens, communities, businesses and infrastructure will have the capacity to survive, adapt and grow in the face of challenges. It is considered that in line with the commitment to make GM highly resilient, the most resilient sites for the relevant sectors should be prioritised for inclusion in the GMSF across the framework area.

Rossendale Council

The Council considers that key to the delivery of this policy aspirations is cross boundary working and the Council would welcome this approach.

Age-Friendly Manchester Older Persons Board

Suggest adding... 'such as poverty, ill health and an increasingly ageing population'. Reason: To acknowledge the ageing population.

Greater Manchester Forests Partnership

Strongly support. The interventions to help achieve this resilience in urban areas are likely to be a combination of tree planting and green infrastructure further up the catchment in rural and urban fringe areas as well as Sustainable Urban Drainage Systems (SUDS)-enabled street tree and other urban tree planting within the urban areas themselves.

Network Rail

Resilience Policy GM16 should include a section on: Encouraging resilience of existing infrastructure (roads and railways) from effects of climate change (flooding, landslips, wind, temperature variations high/low).

North & North Wales Canal & River Trust

It is considered that the policy could usefully reference the contribution that can be made by all waterways to building resilience by providing blue lungs for residents and visitors, contributing to urban cooling in hot summer months and wider opportunities for heating and cooling and flood alleviation, particularly in the context of strategic allocations.

Rochdale Boroughwide Housing

Support the plans to increase flood defences and preparations for extreme weather events. In particular, support measures to help low income households who are typically at greater risk of being affected by floods. Recommend that consideration is given to the impact of building on Green Belt land in flood defence plans. We feel this section provides an excellent opportunity to explore the need for regeneration in greater detail, in particular around maintaining private rented properties and those owned by low income households to avoid losing existing homes to disrepair.

National Trust

National Trust supports the policy suggest that this policy is given more importance as an overall driver for the Spatial Framework and feature more prominently in the overall Vision.

Comments Received on 2016 GMSF Draft

Carbon Coop

Include a commitment to collaborating with Community Energy organisations and delivering municipal energy solutions. The delivery of retrofit and the development of new energy generation via Community Energy intermediaries has the potential to increase community resilience, trust and democratic control and accountability and in doing so has the ability to speed the transition to a low carbon energy system. As the UK Community Energy Strategy (2014) Community Energy projects build community cohesion, local resilience and self-sufficiency.

Bolton & District Civic Trust Executive Committee

This is particularly challenging. The imperative to deliver climate resilient and low-carbon sustainable settlements has never been more pressing.

Greater Manchester Cycling Campaign

Happy to support this policy but concerned that, as in the past, measures are likely to take second place to development.

Greater Manchester Directors of Public Health

Strongly support and welcome the GM16 policy. We are pleased to see the reference to trees as helping to address flood risks.

Director of Land and Planning Peel Group

Clarify or omit the policy from the GMSF. Many of the individual objectives identified in Policy GM16 overlap with other policies elsewhere within the draft GMSF. The role of Policy GM16 is unclear and it should be either clarified or omitted.

The Campaign to Protect Rural England, Friends of the Peak District & the NW Transport Roundtable CPRE is supportive of Policy GM16. However, the scale of greenfield development proposed in the draft GMSF is the wrong direction of travel for this policy aim. As flooding stands out as a key threat, it is important not to concrete over natural environments that soak up and hold rainwater from flooding areas lower down the catchment area.

First Choice Homes Oldham

Demand exists, however with an increasing supply of new homes a plan to consider sustaining existing supply is necessary. Without this the problem may become worse and the demand for new supply will further increase as existing properties become less desirable and fall into disrepair. The need to regenerate private rented properties and those owned by low income households is key to ensure existing supply is not lost unnecessarily.

Manchester Climate Change Agency

We welcome this policy.

Air Quality (GM17)

Who Responded

There were 63 submissions to this section. These were from 50 individuals and 12 organisations:

- Bolton Friends of the Earth
- Carbon Coop
- Cheshire East Council

- Friends of the Earth
- Greater Manchester Cycling Campaign
- Greater Manchester Directors of Public Health
- Natural England
- Peel Group
- The Campaign to Protect Rural England, Friends of the Peak District & The NW Transport Roundtable (single submission)
- Woodland Trust

Summary of Issues Raised

- Consideration should be given to the installation of land side electrics so that ships can switch off their engines when they are in dock (Port Salford).
- A number of site specific comments were received in relation to the location of allocations in terms of minimising the need to travel, existing air quality problems in these areas (sites already breaching EU regulations, impact on AQMA), existing congestion in these areas, question the use of clean air zones, question the meaning of personal travel planning and influencing travel behaviour, impact on health.
- Proposals will worsen air quality
- Support for the provision of electric charging points in new developments. Suggest incentives are provided for retro fitting charging points into existing developments.
- Concerns regarding the impact of increased air pollution on health;
- More detail is required in terms of the requirements of the policy are and what developers will be expected to provide.
- Concern regarding the impact on Lowland Wetland Areas which are already subject to poor air quality due to pollutants settling in dips.
- Welcome the plan to set up the HGV consolidation centres, however the strategy should positively require the creation of low emission zones rather than stating that they could be introduced.
- What are the proposals for reducing pollution from Manchester Airport?
- What are the projected reduction in these pollutants and how will this be achieved and monitored?
- Rail links for freight should be considered to reduce traffic congestion and carbon emissions/air quality.
- If GM is to reduce its carbon emissions by 60% by 2035 every effort should be made to set the standard for new development incorporating the latest advice and best practice.
- Propose banning diesel vehicles in the city centre
- The carbon reduction target of 60% by 2030 fails to reflect the ambition in the Paris agreement to aim to keep the rise in global temperatures to below 1.5 degrees. A science

based target of at least 80% by 2030 should be adopted and the plan should be amended to reflect this target.

- Welcome policy in as much as poor air quality impacts negatively on many wildlife habitats, and populations of particularly sensitive species of plant, animal and fungus.
- All vehicles within the Port Salford complex, either side of the A57 should be restricted to electrical vehicles.
- The plan does not consider or refer to the wider environmental impacts associated with development.
- Air quality in Manchester frequently exceeds safe levels for human health with links to premature deaths and dementia, yet there are proposals in the strategy to develop homes and work places along and close to motorways, motorway junctions and main roads, and to build yet more roads.

Greater Manchester Directors of Public Health:

- Strongly support and welcome Policy GM17, however the GMSF does not substantially address the exposure of people to air pollution both currently and in proposed developments.
 - Recommend that GMSF aims to minimise the exposure by considering current and future air quality in location of housing. In particular housing for vulnerable groups should be sited away from busy roads, siting living accommodation away from roadside facades and ensuring facilities such as schools, nurseries and retirement homes are located in areas where pollution levels will be low.
 - It will also be important to ensure that there is sufficient cycling, walking and public transport to these destinations.
 - In planning new developments, effort is required to avoid the creation of street and building configurations (such as street canyons) that encourage pollution to build up in places where people spend time.
 - Tree planting programmes must take into account the effect that trees can have on street ventilation, based on where they are planted and how they are maintained, to avoid creating areas of poorer quality.
 - Overall there should be more cross referencing to the measures in the published GM AQAP, GM Transport Strategy and Climate Change and Low Emissions Strategies such as home working, freight centres etc. within the relevant chapters of the GMSF.
 - It would be good to see a GM SPD which requires new developments to be designed with active travel and ULEV LEV use completely integrated. New developments should provide electric vehicle charging points in new houses and also streets that are safe for children's play, pedestrians and cyclists
- **Woodland Trust:** Welcome the reference to the role which trees and woods can play in helping to remove air pollutants and improve air quality.

- **Peel Group:** Welcomes the aim of the draft GMSF to tackle issues of poor air quality. However the scale of the "...Major improvement..." which is sought by Policy GM17 is not defined and it is not clear how such improvements will be achieved. The statement at paragraph 20.0.2 states that actions to deliver air quality improvements run through the GMSF, however if this is that case the role and added value of Policy GM17 is not clear.

Campaign to Protect Rural England, Friends of the Peak District and the NW Transport Roundtable:

- CPRE is supportive of Policy GM17 as it is essential that the air quality of Greater Manchester is significantly improved.
- Puzzled as to how GM believes it will control its air quality in view of the scale of aviation expansion and the number of road enhancements that are proposed in the GMSF.
- Areas must not be planned to exceed air pollution limits and this may have implications for those gateways identified that already have significant air contamination issues.
- CPRE believes that GM must benefit from a clean air plan in anticipation of the national network of clean air zones which must be part of the Governments response to the issue.
- Housing developments must be based on walkable neighbourhoods and employment zones must enable a modal shift of transport to rail and water.
- Point GM to commitments made recently by Athens, Madrid, Mexico City and Paris, all of which have agreed to go diesel free by 2025.

Bolton Friends of the Earth

- The plan does not adequately address the legal requirement to improve air quality across GM and particularly in areas already breaching air pollution limits.
- There should be a site specific assessment of the plans impact on air pollution in existing Air Quality Management Areas.
- In order to meet air quality obligations, no new development should be permitted that would lead to an increase in air pollution. This means: all new buildings must be zero-carbon with on-site renewable energy generation, no new major road building schemes or increases in motorway capacity, no new fossil fuel extraction, no new energy generation from the combustion of fossil fuels or solid biomass, airport growth should be constrained so that emissions from flights do not exceed current levels.
- Ambition of reducing carbon emissions and air pollution are not compatible with the proposed expansion of airport usage and road transport.

Manchester Friends of the Earth

- The GMSF provides little evidence that it has policies that will tackle emissions from the large volume of car traffic, the focus is instead on road building which is outlined

in Policy GM6 which has a focus on road building. This makes it unlikely that the GMSF air quality policy will be effective.

- As currently drafted, the GMSF fails to tackle the site specific and broader issues of air quality
- Many of the site allocations proposed in the GMSF are co-located within areas that are currently failing to meet air quality legal limits for the Nitrogen Dioxide pollutant.
- The GMSF should include site specific assessment of the plan's impact on air pollution in existing Air Quality Management Areas
- Greater Manchester must introduce Clean Air Zones where pollution hot spots exist
- Housing development must be based on 'walkable' and cycling neighbourhoods and employment zones must be located near sustainable transport hubs

[Greater Manchester Cycling Campaign](#)

- The final GMSF document should make a stronger commitment to ensure that all the planning and design of new housing and amenities avoids building in a future of car dependency. We are not entirely convinced that this draft document does strengthen that commitment
- The GM Air Quality Action Plan and the Low Emission Strategy acknowledge the issue of poor air quality in the area, and its contribution to ill health, and the fact that emissions from road transport is the major cause of this. It accepts the need to reduce private vehicle use, and to promote cycling. The GMSF needs to incorporate these documents' recommendations which relate to land use and transportation.
- Cycling has the potential to become a highly sustainable mass transit mode, with all the benefits that this would bring in terms of improved health and air quality, and reduced congestion and hence an improved quality of life across the conurbation. But to gain those benefits the GMSF must acknowledge that cycling has the potential to become a serious form of mass transport in Greater Manchester.

[Carbon Co-op](#)

- The Greater Manchester Housing Retrofit Strategy Discussion document (2013) provided an excellent framework to assist GMCA in facilitating whole house retrofit within the City region. We are disappointed that the strategy was never formally adopted by AGMA or GMCA and strongly believe it should be.
- In principle not opposed to heat networks however GM Spatial Energy Plan appears over reliant on these as 'one size fits all' technical solutions to energy efficiency.
- Heat pumps are likely to be appropriate in some scenarios, i.e. in off gas grid areas or in urban areas where air pollution is an issue.

[Ashton Allotment Action:](#) NICE guidelines (Dec 2016) changes to driving style, selection of vehicles by the public sector introduction of cycle lanes, clean air zones and congestion charging.

Tameside Green Party:

- GM should set a date for when diesel vehicles will be prohibited in areas such as the city centre, also dates to phase in low emission vehicles followed by zero emission vehicles.
- Would like to see targets related to air quality with ongoing measurements and progress published.

Natural England: Strengthen point 1 so it recognises impacts on national and European designated sites. The current policy does not take into account the cumulative impacts on air quality of individual sites.

Barratt Homes Manchester: The policy requires planning applications to be determined in accordance with guidance published by the IAQM and EPUK. This is only guidance produced by private organisations which may be subject to change over time. As such it is not considered appropriate to reference this specific guidance in the policy. The PPG provides specific advice on Air Quality both in plan making and development management.

Barbara Keeley MP (Worsley and Eccles South, Labour)

- GM Low Emissions Strategy states that poor air quality has a significant impact on people's lives contributing to a number of respiratory and cardiovascular diseases.
- Indirect impact on the economy through ill health.
- Air quality has wide ranging impacts on the environment such as loss of biodiversity and poor crop yields.
- The lack of coordinated thinking in the framework is troubling.
- Highlights levels of pollution in Salford higher than other parts of GM.

United Utilities: Suggest amendment to bullet point 9 to include consideration of developing near to existing uses, with the preference being to avoid new sensitive receptors such as residential development carefully controlling developments that would generate significant point source pollution such as some types of industrial activity and energy generation. Also locating new sensitive receptors, such as new residential development, away from existing operation activities which generate odour and noise.

Greater Manchester Forests Partnership and City of Trees: A holistic approach is needed to prioritise tree planting in areas that will maximise air pollution reduction along with other ecosystem services. GMSF is an important opportunity to ensure that sufficient space is left (75m) alongside motorways and trunk roads to enable woodland belts to be planted to help reduce air and noise pollution.

North and North Wales Canal & River Trust

Policy GM17 is generally welcomed and in particular reference to maximising sustainable active travel, investing in improvements to walking, cycling and public transport and opportunities to move freight by water.

Reference should be made specifically to increasing the use of sustainable transport corridors such as canals, rivers and disused railways. The Trust would highlight the important role of waterways in improving air quality.

Highways England: Support the policy as the measures identified will also reduce the need to travel on the SRN. Noted that the policy also focuses on measures such as travel planning.

Salford Clinical Commissioning Group

- Concerned by air quality in Salford which is disproportionately poor in comparison to much of Europe, most of the UK and worryingly the rest of GM.
- Want to see clear plans to address this inequality in the GMSF, the focus of the plan is to address inequality in general but believe that specific measures need to be put in place in Salford.

Andrew Gwynn MP (Denton & Reddish, Labour): Request that the destruction of GM's Green Belt is considered more fully in the round. There is no merit in removing Green Belt to develop car-reliant housing and commercial development.

Friends of the Earth: Recommend that there be site specific assessments of the plans impact on air pollution in designated Air Quality Management Zones, and adjustments made to the framework upon receipt of the results such as a requirement for Clean Air Zones.

Haigh Parish Council support the Policy

Bury Liberal Democrat Council Group: Volume of traffic on the motorway has created problems with air pollution.

Worsley Civic Trust and Amenity Society: Worsley area has poor air quality so it is important that policy GM7 Green Infrastructure and Policy GM17 Air Quality are considered together with policy GM6.

Councillor Damian Edwardson (Shevington (Wigan), Labour): Air quality is not confined to the immediate areas but affects the wider populace and the prospect of more HGVs and traffic to and from these routes will do nothing to achieve the ambitions of cleaning up our air pollution. It will increase the problem.

Kate Green MP (Stretford & Urmston, Labour): Air quality already an issue in the area particularly in the vicinity of junctions 9 and 10 of the M60. Proposals in the recently published air quality strategy must be taken into account.

Yvonne Fovargue MP (Makerfield, Labour): GM already fails to meet required standards, additional traffic will lead to further deterioration.

Steady State Manchester: Plan does not adequately address the legal requirements to improve air quality across GM. There should be a site specific assessment on AQMAs.

Flood Risk and Water Quality (GM18)

Who Responded

There were 31 submissions to this section. These were from 21 individuals and nine organisations:

- Environment Agency
- Friends of the Earth
- Greater Manchester Directors of Public Health
- Manchester Climate Change Agency
- Natural England
- Peel Group
- Saddleworth Parish Council
- The Land Trust
- Woodland Trust

Summary of Issues Raised

Recent Flood Events

- Many parts of Greater Manchester were affected by flooding in the 2015 Boxing Day Floods.

New Development and Flood Risk

- Many of the comments on the flood and water theme supported Policy GM18.
- The Vision should refer to flood risk using the suggested wording: 'Greater Manchester will take an integrated approach to protecting the quantity and quality of its surface and ground waters, and the management of its flood risk enabling it to be resilient to current and future climate change pressures'.
- Building on green spaces and the Greenbelt could increase the risk of flooding to people and property and especially to parts of Greater Manchester that have recently flooded, including on Boxing Day 2015.
- Specific places were mentioned that have flooded recently in the past and where new development is planned for through the GMSF.
- Flooding can be devastating to homes and businesses and can result in homeowners being unable to obtain home insurance.
- Not enough is being done to protect existing homes from flooding.
- The GMSF does not make it clear that in exceptional circumstances flood risk can be increased if financial benefits outweigh the risk of flooding.
- Development should not be built in flood risk zones.
- The GMSF housing supply should be delivered on previously developed sites to leave greenfield sites undeveloped for natural surface water drainage.
- Rivers and sewer networks, the latter which are often old and in poor condition, are at full capacity.

- Flooding planning policy should be strongly enforced.
- The requirements of Policy GM18 go beyond the requirements of Paragraph 12.1 of the NPPF in terms of managing flood risk. Priority 3 of the policy requires all development to achieve greenfield run off rates. This should be amended to clarify that this only relates to development on greenfield sites.
- The general issues outlined through Policy GM18 can be properly addressed through site specific flood risk assessments.
- Policy GM18 should include quantitative and qualitative targets to monitor the delivery of the priorities that are listed in the policy.

Climate Change

- The effects of climate change on flood risk should be considered and planned for, and the GMSF should refer to flood events that have a more frequent probability of occurring than once in every 100 years.
- Flooding events that have a magnitude of occurring once in every 100 years are becoming more frequent in some parts of Greater Manchester.

Natural Opportunities for Flood Management

- Flood risk should be managed in a more holistic manner using natural opportunities including farmland and upland areas. There should be incentives for farmers to keep or create land for natural flood risk management, as funding natural flood risk management measures could be an issue.
- There should be greater consistency between the different plans that are prepared by different organizations to manage flood risk.
- Priority 2 of Policy GM18 which seeks to reduce areas of existing impermeable surfaces is incompatible with impermeable surfaces that would accompany the amount proposed housing in the GMSF.
- Priority 4 of Policy GM18 seeks to return rivers to a more natural state where practicable. This may be desirable in some instances, but not always. It should be backed up by evidence.
- Priority 8 of Policy GM18 should be removed or reworded as maintaining river and canal channels are contrary to re-naturalising rivers which is a more sustainable way of managing rivers.

Flood Mitigation

- Making buildings resilient to flooding is important and it should be emphasized in the Policy GM18.
- Support for plans to increase flood defences and to prepare for extreme weather events.
- Support for measures to help low income households who are typically at higher risk of being affected by floods.

- Canals have the potential to accept some surface water run-off to manage flood risk, however the Canal and Rivers Trust is not a land drainage authority and is under no obligation to accept discharges. Therefore Priority 8 of Policy GM18 should be amended by adding 'where appropriate' at the start of the clause and in front of 'through removal of sediment and gravel'.

Sustainable Drainage Systems

- Support for the reference to Sustainable Drainage Systems (SUDS) and green infrastructure in the policy to manage flood risk.
- Trees can slow down drainage, yet they need to be high quality trees to be effective.
- Trees could usefully be referenced in Paragraph 21.0.3 regarding SUDS.
- The requirement to test for the feasibility to incorporate SUDS in new development is considered in the NPPF and the Written Ministerial Statement of 18th December 2014 which means it does not need to be replicated in Policy GM18.
- Not all new development can incorporate SUDS because of ground conditions or site constraints.
- The definition of SUDS should be included in Policy GM18 and there should be more advice on how SUDS can be achieved in new development.
- SUDS help improve water quality but where SUDs infiltrate surface water to the ground it needs to be ensured that any water pollution is treated first.
- Under Priority 2 of Policy GM18, the preference should be for 'above ground' SUDS as they give the most green infrastructure and natural environment benefits.
- The policy wording should be strengthened by amending the policy wording so that: SUDS are used in new development unless it is demonstrated that they are inappropriate; that the management and maintenance of SUDS over the lifetime of the development are considered; that early liaison with United Utilities and Lead Local Flood Authorities on new development proposals occur; and drainage on large sites that might be split into a number of phases should be delivered in a holistic manner.

Flood Risk Assessments

- The existing Strategic Flood Risk Assessment for Stockport does not cover the allocations proposed in the Green Belt in Stockport.
- The EA are working with the GMCA to produce a Strategic Flood Risk Assessment (SFRA) to support the GMSF. The outputs of the SFRA will need to inform the allocations and Policy GM18.

Water Quality

- Surface water run-off from contaminated brownfield sites and diffuse pollution contribute to the failure of waterbodies in Greater Manchester to meet their objectives under the EU Water Framework Directive. As a large proportion of the housing requirement through the GMSF will be on previously developed sites, the remediation of these site for redevelopment

is an opportunity to improve water quality from these sites. The wording to GMSF Should be amended to reflect this.

The GMSF needs to reflect the ambitions of the Water Framework Directive which is an important issue for GM as the majority of waterbodies in the conurbation are failing their Water Framework Directive objectives to meet good ecological status or potential by 2027. Therefore, Policy GM18 and the Reasoned Justification need a stronger focus on improving water quality.

Fracking can affect water quality and should be banned.

- Policy GM18 does not adequately recognise the need to protect habitats from water related impacts. The Policy should cross reference Policy GM10: Uplands and Policy GM11: Lowlands.

Green Belt (GM13)

Who Responded

There were 505 submissions to this section. These were from 491 individuals and 29 organisations:

- Ashton Allotment Action
- Cheshire East Council
- First Choice Homes Oldham
- Forestry Commission
- Friends of the Earth
- George Moss and Sons Ltd
- Greater Manchester Cycling Campaign
- Greater Manchester Directors of Public Health
- High Peak Borough Council
- Home Builders Federation
- Manchester Climate Change Agency
- Member of Parliament
- Members for Worsley Ward
- Messrs Hughes and Lyon
- National Farmers Union
- Natural England
- Peel Group
- Province of Cheshire
- Regent Park Golf Club
- Residents Against Inappropriate Developments
- Residents of Wilmslow (RoW)
- Rochdale Boroughwide Housing
- Rusholme & Fallowfield Civic Society
- Saddleworth Parish Council
- Stockport Council Liberal Democrat Group
- The Campaign to Protect Rural England, Friends of the Peak District & The NW Transport Roundtable (single submission)

- Westhoughton Liberal Democrats

Summary of Issues Raised

Objection to the Principle of Green Belt Loss

- There should be no net loss of Green Belt. This is a decision that cannot be reversed. Green Belt was introduced to ensure such areas were preserved whereas these proposals ignore this concept and modify it, threatening the permanence it is supposed to represent and therefore setting a precedent for further revisions.
- Object to the large and disproportionate scale of Green Belt release in some areas and the uneven spread of release across the city region.
- Proposals to release Green Belt conflict with reference in GM13 to retain, protect the Green Belt and serve the five purposes of Green Belt.
- Cannot be certain of the population increase over the next few generations. A more cautious approach should be taken and other options explored
- The Northern Powerhouse needs to look beyond GM and consider new towns beyond the Green Belt. They may well be preferable to allowing coagulation of the conurbation towns to continue.
- Concerns expressed regarding the role of developers in the release of Green Belt.
- Use of Green Belt land for development, which in many cases contains areas that are economically active, runs counter to the economic uplift of poorer areas and removes diverse rural economic activity. Brownfield sites are in less economically active areas, and will allow affordable homes to be built nearer places of employment and existing amenities, as well as bringing growth to more deprived areas and communities.
- These areas are located in peripheral locations far away from places of work in the district centres.

Other Alternatives Should Be Considered Before Using Green Belt Land

- The proportion of brownfield land should be increased up to 80-90%. Vacant and derelict brownfield sites should be prioritised, many of which are disused mills, land within town centres, derelict land, industrial and commercial properties.
- More should be done to remove the obstacles that prevent brownfield sites coming forward including designation for housing and compulsory purchase/viability of developing on brownfield land. A requirement should be put in place that a very high percentage (more than 95%) of the brownfield area should be used, sold and occupied before Green Belt sites are released.
- Growth will be required to support the city centres, and therefore the priority should be to build houses on brownfield inner urban areas such as in the north and east of Manchester and areas of Salford, not peripheral areas.

- Large numbers of empty properties in the inner urban areas, with approximately 11,000 properties in GM lying empty for more than 6 months.
- Higher densities of development should be explored.
- Planning permissions should be built out first.
- In the short to medium term there will be alternative albeit smaller opportunities for residential development within urban areas when the number of petrol stations falls with the mass introduction of electric cars, expected to be onwards from 2020.
- Need to look beyond the Green Belt to the surrounding open moorland. Whilst this may impact upon native wildlife it will not take away the well-used Green Belt countryside within urban areas.
- Local authorities should specify conditions which make better use of existing land and property, such as by ensuing new development is of multiple occupancy i.e. flats and apartments rather than large detached houses, and by requiring new employment uses to provide residential uses above the workplace.

[**Contrary to Government Policy or Legislation**](#)

- Exceptional circumstances do not exist for reviewing Green Belt boundaries. Housing growth need and increased economic activity are not reasons alone for the development of large areas of Green belt.
- Not consistent with recent announcements and ministerial statements from Government that the Green Belt is sacrosanct and should be protected and the need to reuse previously-developed land.
- The approach is in breach of several UK and EU Habitat Directives.
- Building on the Green Belt is contrary to NPPF Green Belt policy in Paragraphs 87 and 88 which seek to resist inappropriate development, and as such is at odds with Green Belt policy in the District Local Plans.

[**Conflicts with the Ability to Meet the Five Purposes of Including Land within Green Belt and Maintaining Defensible Boundaries**](#)

- Conflicts with and not possible to satisfy the purposes of checking unrestricted sprawl of built-up areas, preventing neighbouring towns from merging and safeguarding the countryside from encroachment. Proposals will add to and encourage sprawl resulting in no separation between urban areas, particularly between Rochdale/Heywood and Manchester and between Greater Manchester and Cheshire East.
- The proposals for amending Green Belt boundaries do not describe or quantify the significance of the land to be lost and also leaves fragmented pockets of existing Green Belt vulnerable to future development pressures. These should be afforded added protection possibly as buffer zones, accessible greenspace or green infrastructure.

Proposals Undermine Other Policies and Objectives of GMSF

- The proposals are contrary to efforts to regenerate our urban areas and town centres. Should concentrate on town centre regeneration e.g. Stockport and providing affordable housing close to amenities
- Building on the Green Belt will increase the risk of flooding, preventing the land from absorbing excess run-off.
- Does not accord with objectives to expand and enhance green infrastructure and increase tree planting. It is vitally important that any mature trees, woodland and SBIs are further protected and enhanced.
- Loss of farmland alongside an increase in population endangers our ability to produce food, particularly when there is a need to be self-sufficient post-Brexit. Any decision on Green Belt should strategically assess the impact of other development on both farmland and the future growth of farm businesses and any adjacent farm businesses.
- Natural resources are already under sustained pressures from many different sources. Nature is gradually being destroyed and there is a need to protect their habitats. Large number of species of different types and importance to be lost or displaced. Local naturalists should be fully engaged in this process.
- The concept of a "net" reduction implies that many older Green Belt sites will be lost and some will be replaced with new areas, however, these will not be as wildlife rich and will be more human recreation areas.
- The extent of the proposed release of Green Belt land is in conflict with the value placed on Green Belt space as part of the wider public health agenda. Loss of open space and recreation deprives future generations of people from having some connection with the natural environment.
- Green Belt is an important asset to Greater Manchester and its 'green lungs' and heritage value between towns are part of its identity, this should be retained and enhanced. Its removal will be of severe detriment to quality of life.
- Would not create mixed communities but will rather result in social segregation, ghettoization and large areas of new housing which look virtually identical to each other, undermining the sense of place and distinctiveness of communities.
- Must avoid the overdevelopment of rural areas and any harm to unspoilt countryside.
- Environmental impact via greenhouse gases, reducing air quality for the current residents and making the carbon target harder to meet.
- Concerned about unauthorised development in the Green Belt. In such cases, there is no opportunity to appropriately limit or mitigate the harm that has already taken place. For these reasons, objector seeking to introduce a new evidenced-based planning and recovery policy for the Green Belt to introduce early in the next Parliament to strengthen protection against unauthorised development.

Issues Arising From the Release of Green Belt and Development in Previously 'Undeveloped' Areas

- Building on Green Belt will bring development into area(s) that will add to already congested roads. Increased congestion and vehicular emissions poses a threat to air quality.
- Too much development already and much of it is mismanaged.
- Existing social and utilities infrastructure already over-subscribed and so additional development will put additional stress on the system, negatively affecting health.
- Building new housing and industrial development in the Green Belt will result in a massive increase in Greater Manchester's material footprint.

Comments in Support

- Support GM13 and its aims.
- Support from some housebuilders for Green Belt release and believe that the GMSF is the right mechanism to do this.
- Exceptional circumstances do exist to release Green Belt to meet needs that will arise up to 2035 and beyond.
- Recognition of the proposed approach to releasing Green Belt sites by identifying a relatively small number of larger sites capable of supporting the range of infrastructure and facilities required, rather than widespread incremental development of smaller sites. Such an approach provides for a simpler plan-led system.
- Loss of Green Belt to meet needs is much better than the alternative, which is pushing development out into national parks, and building on city parks. Protection of Green Belt from development will result in a loss of parks. National housing targets are such that if sufficient sites are not released, developers will take the GMCA to court, and force the release of sites. Green Belt land will be released, and rejecting the GMSF will only mean that the release will not be planned.
- If limited development on Green Belt land is necessary, then proposals which are sensitive to the need to retain what is valuable about Green Belt should be given preference, favouring developments which do not overwhelm previously rural land.
- Pleased that the policy approach protects the Green Belt where it forms a buffer between villages to prevent coalescence which would be detrimental to the character of the areas concerned.
- Support for release of Green Belt land to provide housing opportunities as there is a lack of family homes in areas people wish to live and there is land available to meet the shortfall with existing infrastructure in place to support it.

Suggested Amendments to the GM13 Policy/Approach

- The policy should be expanded to cover the exceptions contained within Paragraphs 89 and 90 of the NPPF.

- Safeguarded land is necessary to provide certainty to both residents and developers and should be identified in order to ensure that the coordinated growth of Greater Manchester in the GMSF is continued beyond the plan period, until at least 2050.
- Clarify whether the Green Belt alterations proposed will need to be ratified by lower order Local Plans and whether they will be supplemented with localised alterations.
- The stated 8.2% net reduction in Green Belt at page 75 overplays the proportion of Green Belt to be released as it only relates to land within GM, the Green Belt around GM extends into a number of other authority areas outside the remit of this plan and so the 4,900 hectares comprises significantly less than this figure.
- Figures 16.1 and 16.2 show the areas of Green Belt proposed for release, the only exception being the 'North Bolton Area of Search'. The reasoning behind this is unclear and the area appears an anomaly with regards to the plan. It is not clear whether all Green Belt in the area will be released or not and whether the Bolton Local Plan will pick up this issue, therefore clarity must be provided prior to the next stage of consultation to prevent its delivery being jeopardised.
- Figure 16.2 Proposed Amended Green Belt does not show proposed deletion at OA12 'Robert Fletchers'.
- The commitment to Green Belt protection should be qualified, having regard to the commitment to substantial Green Belt release. Protection against the loss of Green Belt to meet development needs will be stronger where the land performs a strong role in meeting several purposes of Green Belt.
- Scheduling and mapping of Green Belt to be lost outlining the existing use and significance.
- It should be made clear what alternative options have been considered such as smaller sites on the edge of settlements.
- Where possible the development of Green Belt land should enhance existing supply and help address adjacent brownfield sites that alone provide limited regeneration opportunities.
- There needs to be a degree of flexibility to recognise that other smaller Green Belt sites on the fringes of urban areas may be considered suitable for development over the plan period particularly to assist with delivery in the shorter term should targets not be achieved through the larger strategic sites. These small sites should be covered by a separate policy that allows these to come forward at a local authority level supported by local authority evidence reviews.
- The large areas of Green Belt proposed for release should be broken up with retained Green Belt which should link the adjacent areas of Green Belt to each other.
- Green Belt should be extended to include locations adjacent motorways and trunk roads to protect residents from the adverse effects of vehicle pollution on their health. Allocations adjacent motorways should be removed.

Suggested Amendments to Other GMSF Policies Affected by Policy GM13

- Suggest that all allocations leave at least 33% of the area as publicly accessible green spaces, with 50% of these green spaces also being left as natural habitat.
- Development within allocations should be to the highest levels of self-sustainability with the highest insulation standards, full photovoltaic roof tiles, and other technologies for self-electric and heat generation etc.
- Developer requirements should include contributions towards maintaining green spaces this may increase community support for Green Belt release.
- There needs to be greater consideration of the development of new green spaces, the planting and development of new trees and biodiversity, protection of existing conservation areas, and the designation of new conservation areas.
- A chapter dedicated to brownfield development and the ‘brownfield first’ approach would strengthen the Plan. This could outline where the current brownfield sites are together with a list and a map and how they make up the supply as this is not made clear at present with only Green Belt releases shown.

Suggested Additional Evidence Base Requirements or Actions

- Need more synergy between GMSF and Local Plans to give certainty on Green Belt boundaries. Local Plans at district level need to be progressed as a matter of urgency
- Local Plans should include Green Belt reviews within their remit as there are numerous anomalies where the original boundaries were badly drawn or circumstances have changed, and the GMSF should reference this requirement or at least provide clarity on the approach.
- A Greater Manchester-wide SHLAA should be undertaken and a trajectory prepared to ensure the exceptional circumstances case is adequately demonstrated and to provide evidence on need, supply and any further releases.
- Need to assess the cumulative cross-border impacts of development in GM and Cheshire East, in particular the transport impacts including air and noise pollution.
- Need to assess the impact on the setting of listed buildings and landscapes.
- Significant action required to mitigate reduction in Green Belt with regard to green space provision including greening of urban environments, biodiversity and carbon reduction.
- Manchester City Council’s Green and Blue Strategy should be replicated at the GM level.
- Require extensive and meaningful consultation and engagement going forward for those affected.
- Systematic review of brownfield land needed together with a consultation where the public can suggest brownfield sites they are aware of and a monthly schedule showing progress of brownfield sites being released and how any obstacles are being overcome.
- Produce an accurate measure of capacity of business to ascertain the need for warehouse/light industry development to help identify the millions of square feet of unused

business premises around the Greater Manchester region which should be prioritised before use of Green Belt land.

- There is a need for better, up to date employment land requirements as too much employment land is identified and could be alternatively be allocated for housing.
- For every property on brownfield land that is built the developer should be allowed to develop a property on Greenfield land of a similar size.
- The mapping system needs to be improved to provide better legibility.
- Need for more information on the size or type of development proposed in the Call for Sites suggestions and how they relate to the proposed allocations.

[**Comments on Proposed Addition to Green Belt at West Salford Greenway**](#)

- Support from many local residents and Councillors who see the site as being integral to the community and find the proposal to be consistent with previous representations made at appeal to protect its characteristics.
- Provides a physical break in the urban form and prevents urban sprawl.
- Protects much needed green lung for local residents and visitors to area, vital in offsetting effects from high levels of air pollution and noise.
- Provides the strongest possible protection for and preserves setting of adjacent historic areas of importance.
- Site subject to full Public Inquiry.
- Objection from Peel Holdings, who view it should be omitted as it is unjustified, parts of the site are suitable for high quality residential development that can meet needs, and because a similar proposal in the Salford UDP was rejected due to the Greenway's physical links to the Green Belt being 'tenuous'.

[**Comments on Proposed Addition to Green Belt at Standish**](#)

- Support from local residents, due to the need to protect open space from development pressure which is mounting in local area, and to provide recreational facilities for those prospective residents.
- Standish is set to increase in size by a quarter as a result of recent consents and so additional Green Belt is welcomed.
- Will result in a more robust and distinct boundary to the village which is important in the face of increasing development pressure in Standish and adjacent towns such as Coppell in Chorley Borough.
- Not clear how this proposal compensates residents for removal of Green Belt in other areas such as Winstanley and Orrell, Standish is not considered for Green Belt release and so addition of Green Belt here is not essential.

Comments Received on 2016 GMSF Draft

- Objection from Morris Homes as the proposal has not been explained or justified, does not take into account the development needs of Standish or the urbanising influence of development already approved and there is no inherent quality to the countryside being protected. The site should therefore remain as safeguarded land.

[Comments on Proposed Addition to Green Belt at Roch Valley](#)

- Support, as this will help protect and maintain a secure and diverse network of localised habitats in the area.

[General Comments on Green Belt](#)

- Farmland and farming activities should continue to take priority in Green Belt, with national and local planning policy that promotes farming.
- Planning policy for farms in Green Belt should seek to promote diversification opportunities that will help support productive farm businesses, including for leisure and recreation, local food production, packing and retailing, homes on farm, employment and renewable energy as well as opportunities to increase biodiversity and local wildlife.

[Comments from Political Interests](#)

- Many Members of Parliament state their views that there are vast numbers of brownfield sites that should be prioritised first and that Green Belt release undermines their potential for regeneration.
- Tameside Green Party wish to seek clarification on what is meant by 'maximising sustainability' in relation to the Vision and Strategy whereby the proposal is to focus on a small number of large sites allowing for the creation of mixed use neighbourhoods and supported by infrastructure and services. Loss of large areas of Green Belt is not sustainable and only serves to aid the development industry.
- Andrew Gwynne MP (Denton & Reddish, Labour) believes that the scale of Green Belt release is unnecessary as appeals to refusals on development involving Green Belt are being consistently overturned, contrary to the assertion of GM local authorities.
- Andy Burnham MP (Leigh, Labour), now the Mayor of Greater Manchester, views that the plan should be re-written to achieve a substantial reduction in loss of Green Belt. Support is given to the commitment of ensuring the GMSF releases the minimum amount of Green Belt to meet our need sustainably, although this should be strengthened to ensure no net loss of Green Belt or as close to this as possible. The difficulty of this is recognised and further work is required to designate new areas of Green Belt to replace those that may need to be lost.
- William Wragg MP (Hazel Grove, Conservative) outlines concerns on the impact on the existing road network and the likely pressure on public services.
- Barbara Keeley MP (Worsley & Eccles South, Labour) outlines concerns over the proposed net loss of over 8% of Green Belt across Greater Manchester and considers this to be contrary to the five purposes of including land in Green Belt within national planning policy. The proposal would also result in loss of green space which have many benefits including

health and wellbeing, and will set a precedent for further loss. These concerns have been raised at Parliament. Exceptional circumstances do not exist.

- Councillor Andrew Western (Trafford; Priory, Labour) notes that the volume of housing required will not be secured without encroachment onto the Green Belt and that many of the sites identified have significant potential as areas capable of delivering substantial economic growth as well as delivering the housing units that are so desperately required.

Comments from Interest Groups

- The Campaign to Protect Rural England calls on GMCA to set more ambitious targets for Green Belt protection and enhancement, to prioritise saving existing Green Belt and creating new Green Belt. The GMSF should include a strategy for securing the greater positive use of Green Belt, as recommended by the Green Belt Assessment, as there remains considerable scope in terms of providing for informal recreation close to the conurbation in particular.
- Friends of the Earth opposes loss of Green Belt and is critical of a failure to consider reasonable alternatives to Green Belt, lack of robust evidence and no case for exceptional circumstances. Previous brownfield targets should be used and new development should be in locations that reduce greenhouse gas emissions.
- Forestry Commission suggest that a quality not quantity approach to Green Belt is required to ensuring that Green Belt is managed for the social, economic or environmental outcomes that are required over the next 25 years.
- National Farmers Union are particularly concerned with the proposed significant loss of Green Belt where this is farmland, as, particularly where the land is productive, the contribution that Greater Manchester can make to its own food security UK food security, together with reducing flood risk and recreation, are being undermined. However, farmers also need to maintain the viability of farms by utilising land and so where it is appropriate and makes economic sense some development on farmland should be allowed.
- Greater Manchester Cycling Campaign does not support Policy GM13 on sustainability grounds. The plan currently does not and should consider the impact on the environment outside GM and overseas of the increase in number of residents and associated resource consumption and degradation of environmentally sensitive habitats such as the Arctic and rainforests.
- Manchester Climate Change Agency view that the current Green Belt proposals appear to be inconsistent with stated GM policy objectives and commitments in other GM policy documents.

Comments from Local Authorities

- High Peak Borough Council - The GMSF should be informed by a comprehensive Green Belt Review in addition to a Green Belt Assessment. As such, there is concern that the proposed scale and distribution for growth and proposed release of land from the Green Belt is premature pending the need for a review to be undertaken. The review is important as High Peak share a common area of Green Belt with Stockport and Tameside Councils.

- Greater Manchester's Directors of Public Health support the policy but note that it is undermined by an erosion of the existing Green Belt. The creation of new settlements in the Green Belt, on land identified as the most suitable by a strategic review, is preferable to the erosion of the Green Belt at its margin or to substantial loss of urban open space. Where open space is to be lost, developments should include attractive green pedestrian and cycle passages, structured provision of space for tranquillity and space for active recreation and re-provision of open space such as green roofs.

Comments from the Development Industry

- General support from housebuilders on the principle of Green Belt release to meet needs, stating that exceptional circumstances exist, although the amount of land that needs to be released has been substantially under-estimated.
- Safeguarded land should be identified to aid deliverability and allow the full housing target to be delivered over the plan period with residual land remaining rolled forward to the next plan period. The minimum requirement is to provide a similar amount of safeguarded land to the amount of Green Belt being released in this plan period, as was found in the Cheshire East Local Plan examination.
- The Home Builders Federation state that, without additional releases, the amount of new development that could be planned would be low, and would lead to significant reliance upon neighbouring authorities agreeing to take any unmet needs, when their ability to accommodate such need is extremely unlikely.

Peel Land Holdings view that the scale of Green Belt release is insufficient to meet needs as the housing requirement has been set too low and the existing supply has been overestimated. Further releases are required to make the GMSF sound and it is requested that additional land be released for land allocations, reserve sites and safeguarded land. Protected Open Land sites which are suitable and available should be allocated for development.

Social Infrastructure

Social infrastructure was identified by respondents as a wide range of services including: GPs surgeries, hospitals, dentists, chemists, nurseries, schools, emergency services and churches. Many respondents pointed out that social infrastructure is already struggling to cope with existing demand as a result of recent housing developments, cuts to services and lack of key workers. Many respondents were concerned over the additional impact of the proposals within the GMSF for additional housing and employment development. Several respondents also objected to the negative impact.

Specific issues were raised about existing education capacity, including: the likely impact on educational attainment of larger class sizes and greater pressure on school places. Some respondents also commented that sports facilities and provision were overstretched and had been lacking in investment despite population growth and an increased demand. Many respondents thought that the existing strain on social infrastructure should be addressed first before any additional development proposed by the GMSF took place.

One respondent stated that there should be detailed engagement with the education, health and utility bodies to advise on whether the land put forward are viable for development.

One respondent suggested that proposals to provide and improve infrastructure should be prepared and approved before and not after GMSF proposals for housing are approved.

One respondent proposed that an assessment of potential infrastructure requirements relating to education, healthcare, open space and local shops and services was undertaken to provide evidence base for the GMSF.

One respondent was keen to see an increased emphasis placed on the delivery of social infrastructure as well as transport and utilities. Good schools, parks, transport, social care and community facilities were regarded as playing a key role in both stimulating and sustaining a buoyant housing market and in ensuring that residents can choose to live both inclusively and healthily within their community. A stronger link to GMs plans public sector reform plan and the spatial implications of each of the proposals was seen as necessary.

Several respondents were sceptical that the development industry would pay for additional infrastructure or that the revenue from additional council tax incomes would fund such requirements. The respondent concluded that government investment was essential.

Several respondents highlighted the existing strain on police, ambulance and fire services and that additional development would exacerbate this unless additional provision was made.

Education, Skills and Knowledge (GM21)

Who Responded

There were 27 submissions to this section. These were from 16 individuals and 13 organisations:

- Cheshire East Council
- Denton South Neighbourhood Plan
- First Choice Homes Oldham
- Friends of the Earth
- Greater Manchester Cycling Campaign
- Greater Manchester Directors of Public Health
- Heyford Developments Limited
- Members for Worsley Ward
- Peel Group
- Rochdale Boroughwide Housing
- The Campaign to Protect Rural England, Friends of the Peak District & The NW Transport Roundtable (single submission)

Summary of Issues Raised

The policy is too vague with no clear indication of how the shortfall of school places, arising from the proposed additional housing, will be met. Providing adequate nursery and school place provision that will be required as a result of the additional 227,000 new homes will be paramount to the success of Greater Manchester and must be addressed properly.

Concerns raised over the existing shortfall of nursery, primary and secondary school places. Especially in Littlemoss, Droylsden, Heald Green High Lane/Marple area, Shaw, Worsley and Boothstown. The areas of Shaw and Worsley and Boothstown are specifically mentioned as needing a new secondary school to cope with current demand. Siblings are unable to get into the same

schools, causing major problems for parents having to commute to 2 schools. We cannot continue to increase pressure on these services by increasing housing numbers.

The policy needs to be strengthened to include the need for learning environments to have a high level of green infrastructure and should mention the need for good quality on site open space.

There needs to be a better public transport system in place to access existing and any new schools across Greater Manchester. With many families now having to travel much further to access schools it is vital the appropriate transport infrastructure is in place to assist this. Many parents have to travel by car which adds to environmental issues, increases congestion and pollution levels.

Previous documents referred specifically to the rebuild of Elton High School - this and all other local schools are already over-subscribed. Is it realistic to expect the local authority to deliver new schools/further education facilities.

Rochdale has one of the highest quotas of refugees in the North West and therefore is already suffering additional pressures on education services. Rochdale also ranks as one of the top 10 most socially deprived areas with massive improvements needed in Social Care for both adults and children. Many young people do not have aspirations of getting highly paid jobs as none are available within Rochdale.

The current education system in Greater Manchester is poor. Local Authorities are closing schools to sell off the land for housing and opening Academies which do not provide a good standard of education and have far too high pupil to teacher ratios.

Rochdale Borough Housing recognises the need to ensure that residents in Rochdale can access the jobs created by growth in Greater Manchester. Exploring early on the potential for investment in apprenticeships and training could support this while addressing the risk of a construction skills shortage.

Corridor Manchester: Supports the continued improvement of university facilities and accommodation as part of a wider range of measures to make Greater Manchester an attractive location for students and researchers. They are pleased that reference is made to the importance of enhancing facilities and sense of place within The Corridor along Oxford Road, Manchester.

Bluemantle: Supportive of the identification of the need for improvements in skills. The policy could usefully identify the University Hospital South Manchester (UHSM) and the current and future plans for Medipark in the context of its potential to expand and accelerate health care/medical training and teaching, which continue to be essential skills and will be necessary to help the GMSF meet its overarching objectives. Specific reference to Medipark and the proposed extension of UHSM would provide a clear and unambiguous statement of support for such uses in the location.

The Greater Manchester Public Health Network: Strongly supports the GM21 policy. Education is essential to ensuring good health outcomes through enabling people to access jobs and life chances. The reference to ensuring new developments deliver sufficient school places is important and needs to be enforced at the local planning level. Point 4 of the policy could be strengthened by stating that the priority is public transport, walking and cycling links to such institutions. They would also like to see reference made to inequalities in education and that areas of deprivation are specifically

considered with reference to developments in education, and that this takes account of primary, secondary and tertiary education.

CPRE: Supportive of Policy GM21 to capitalise on the high concentration of higher education institutions and other training and skills development assets.

CPRE: Supports fair employment conditions, and calls for employers and organisations working across the full range of economic sectors to support upskilling with a corresponding rise in wages and standards of living in all areas, particularly rural areas that have been adversely impacted by globalisation and new farming practices requiring fewer people employed in the agricultural sector.

First Choice Homes: Concerned that current demands in the construction industry are outstripping labour availability. Careful planning is needed to ensure a sustainable labour force is available, whether through training opportunities or the introduction of new methods of construction. A coordinated approach to apprenticeships and training would enhance the offer and improve the ability to deliver the challenges brought by such major construction. This should be planned ahead of demand in order to ensure targets are achievable through the availability of sufficient labour; this should in turn help to control costs, ensuring inflated costs are not unnecessarily encountered.

Heyford Developments Limited: Whilst financial contributions secured for improving the capacity of schools is supported in principle, this is subject to viability considerations. In line with these comments, Policy GM21 should clearly state that the delivery of sufficient school places in conjunction with new developments is subject to viability and that financial contributions will be negotiated where possible.

Peel: Supports the flexibility Policy GM21 provides for new developments to deliver on or off-site solutions to the need for more school places. Peel have identified the existing capacity of schools within two miles of some of the larger sites and have considered how this will impact on the scale of net provision required from the sustainable urban extensions in Table 3.1: Sample Preliminary review of existing school place capacity and impact on net requirement for additional places.

Greater Manchester needs to ensure that the Government guarantee apprenticeships for young people up to the age of 30.

Tameside Green Party: The plan is an opportunity to plan for the jobs of the future, specifically in green technologies and the training to ensure we can be successful in them. In addition, they would like to emphasize education as a lifelong activity for all aspects of life. This would support the vision of the citizen's place in society as mentioned in the social inclusion policy. We feel lifelong education should be a part of the Social Inclusion Policy.

Rossendale Council: Policy GM21: the importance of improving transport links to neighbouring districts in order to draw on their skills is recognised and this is welcomed. However the Council is concerned about the lack of specific reference to Rossendale as one of the main labour exporters into the region. It is considered that the transport linkages from Rossendale should be an important part of the consideration of the proposed employment allocations.

Barratt Homes: Supports the key objectives of draft Policy GM21 and in particular point 3, which emphasises the need for high quality residential areas capable of attracting and retaining skilled

workers. A suitably skilled labour force within the city-region is essential for the GMCA's aspirations for economic growth over the lifetime of the plan.

Church Commissioners for England: Policy GM21 is correct in identifying the need to ensure there are school places to support new residential development. However the current approach in Criterion 2 does not reflect the differences between CIL and S106 contributions and is currently phrased in an ambiguous way so the current approach is unsound on the basis of being ineffective. We would advocate a much simpler wording in Criterion 1 such as 'Ensure the delivery of sufficient school places in conjunction with new developments'. This would allow greater flexibility in the delivery of school places.

Unite Group PLC:

- Supports the broad focus of criterion 5, however greater detail is required as to its implementation and additionally the role new student accommodation and its delivery will play in the continued improvement of university facilities. The policy is not explicit as to whether the improvement of university facilities and accommodation relate solely to existing assets / properties or whether this does represent policy support for the delivery of new purpose built student accommodation in the city. University accommodation plays an integral role in the student experience and it is essential to ensure a choice of accommodation tenures is available to students throughout the duration of their course. The requirement to provide for a choice of accommodation is reflected within NPPG Paragraph 50 and mindful that student accommodation forms part of conventional housing supply (particularly within Manchester where students have a direct impact upon the local housing market and demographic and this reflects NPPG Paragraph 38) it is essential the draft GMSF provides sufficient flexibility to meet identified housing need for both conventional forms of housing and non-conventional such as student housing.
- More stringent planning regimes within Greater Manchester have hindered pipeline delivery of student accommodation, including that of Manchester Core Strategy Policy H12. This arguably goes against the grain in terms of national aspiration and further in terms of robust and quantified assessments of student housing need.
- Greater consideration should be given to wider benefits that the delivery of student housing can bring to the delivery of more conventional forms of housing. The deliverability of student housing is paramount to solving the housing crisis in city-regions such as Manchester with student housing known to impact on local housing markets and economies in the following ways:
 - Release of other market housing on to the general market such as the alleviation of concentrations of HMOs to family housing. This can effectively relieve the current pressure of certain areas in the borough currently experiencing high concentrations of HMOs;
 - Strong demand for higher quality university product amongst international and post-graduate students thus stimulating further investment;
 - PBSA has played an integral role in allowing the HE sector to expand over the past 20 years;

- Student Housing can be far more suitable for certain central location sites, particularly wherein site circumstances would not allow for the levels of amenity space provision required in larger residential schemes.
- Notwithstanding the above, Unite PLC does support the policy direction in so far as there are opportunities to improve, diversify and enhance existing student housing assets. However Unite PLC are disappointed that limited policy coverage has been provided thus far.
- Recommend wider policy support should be afforded to the growth and expansion of current HEI's and supporting infrastructure including student housing especially where they would relieve pressure on conventional forms of housing in areas of identified need. The Council should also give further consideration to enhancing the vitality and viability of existing student assets; this could be through the delivery of additional beds or by widening the occupation of these buildings outside of term time. Such ancillary uses can suitably be managed through appropriate management plans to be considered and approved by the Council.

Greater Manchester Housing Action: Broadly supportive of Policy GM21.

Medipark: Supportive of the identification of the need for improvements in health, skills and the quality of life of residents which can in part be enhanced through the improvement, extension and development of existing hospitals and medical facilities in addition to the creation of new and associated services. Policy GM21 could usefully identify the current and future plans at University Hospital South Manchester, by Medipark, to expand and accelerate health care/medical training and teaching, which continue to be essential skills, and will be necessary to help the GMSF meet its overarching objectives. This would provide a clear unambiguous statement of support for such uses in this location.

Great Places Housing Group and Greater Manchester Housing Providers: Improving schools, in areas that currently have low demand for housing, could revitalise these areas. This policy needs to examine the shortage of skilled construction workers. Exploring the potential for investment in apprenticeships and up-skilling could address this skills shortage, whilst creating employment opportunities for residents of GM. Off-site construction is increasingly being used to quickly build high quality homes and further growth in this industry will be particularly dependant on sufficient appropriately skilled workers.

Salford City Council Conservative Group: Support the aims set out in GM21 regarding school places and education provision. It is essential that this social infrastructure is in place prior to or alongside any further development.

Health (GM22)

Who Responded

There were 40 submissions to this section. These were from 28 individuals and 13 organisations:

- Cheshire East Council
- Friends of the Earth
- Greater Manchester Cycling Campaign
- Greater Manchester Directors of Public Health
- Historic England

- Manchester Climate Change Agency
- Members for Worsley Ward
- Rochdale Boroughwide Housing
- Saddleworth Parish Council
- The Campaign to Protect Rural England, Friends of the Peak District & The NW Transport Roundtable (single submission)
- The Land Trust

Summary of Issues Raised

A number of respondents supported the health policy and the need to improve the health of residents.

The majority of respondents indicated that healthcare provision (hospitals, GP surgeries, mental health services, dentists etc.) in their area was already inadequate or overstretched. The follow on comment was generally that any additional housing growth, including increasing urban density, would increase the burden on existing healthcare services and detrimentally impact on the quality of life of existing residents.

Many responded that there was no indication where new healthcare services and facilities would be provided and how they would be funded, including the impact on limited central government investment.

A number highlighted that the provision of good quality housing would help to reduce the demand and impact on health service providers but that this should not be at the expense of open space and Green Belt.

In addition one respondent suggested that delivering affordable housing, as part of investment in improving living standards and health outcomes, on the green field sites was essential rather than a focus on 3, 4 or 5 bed detached homes.

GM Housing Action highlighted the lack of policy provision in the GMSF to address the aims in relation affordable housing provision and improved health outcomes.

Poor air quality was specifically highlighted as a significant risk to health and that the GMSF proposals for housing and economic development would increase congestion and therefore pollution from vehicle emissions and in some cases construction work. One respondent stated that the expanded airport would also contribute to this issue.

The impact of developing green space and Green Belt was noted as having a potential harmful impact on people's health and wellbeing by a number of respondents.

One respondent disagreed with the targeted control of premises that sell unhealthy food and alcohol, stating this was down to individual choice and that any attempts at targeted control would potentially impact on jobs in those sectors.

One respondent suggested that the focus on prevention and mitigation is unreasonable and unlikely.

One respondent suggested that to improve the health, mental health and well-being of residents essential care should be provided at a community level.

One respondent suggested that there was a need to increase social infrastructure facilities - health, sports and for the elderly.

Greater Manchester Housing Providers recommend looking at the standards being adopted in the Healthy New Towns Programme.

The Wildfowl and Wetland Trust: Highlighted the important link between green infrastructure and enhancing people's health and well-being.

The Canal and River Trust: Highlighted that economic prosperity is dependent upon having a healthy and active workforce. Waterways have a significant role to play in this, through tackling physical inactivity, obesity and reducing stress, specifically in disadvantaged communities with waterways on their doorstep. CART also highlight that 25% of the GM population live within 1km of a canal or river and that all residents are within a 20 minute travel time. Therefore this represents a significant opportunity for improving health and wellbeing.

Tameside Green Party: Suggested there was a need to recognise the importance of the GB for leisure purposes that are suitable to all age groups and ability/disability.

Several respondents highlighted the evidence that suggests that green spaces have a positive impact on health, including mental health. One respondent also highlighted the PHE briefing on 'Improving Access to Green Spaces' which emphasises the importance of green spaces on health outcomes, specifically, how income related health outcomes are less pronounced where people have direct access to green space.

One respondent pointed out that GP provision is outside of council control and that other healthcare infrastructure and services such as chemists and District Nurses will be needed.

Additionally the impact of the aging population was highlighted and that the need to provide more care facilities is taken into account.

One respondent expressed concern that increased development along road corridors would lead to greater congestion and that this in turn impedes the response time of emergency vehicles.

Age Friendly Manchester Older Persons Board: Suggest policy wording change to point 5 - adding 'high quality affordable and accessible or adaptable homes'. Reason: To recognise the increasing demand for housing for older and/or disabled people.

The GM Directors of Public Health: Specifically welcome the inclusion of the policy but make a number of recommendations: that 'health disparities' is changed to 'health inequalities' to be consistent with other GM policies on population health; that where a proposal does not comply with a health related policy that a full HIA of the proposal should be carried out to a methodology agreed with the local Director of PH; and Point 6 should more explicitly link to the GM Health and Social Care Partnership Taking Charge plan and the Healthier Together agenda.

The Land Trust: Suggested some amendments: para 5.0.2 – the need to emphasise that a greener well maintained urban environment will contribute to people's health and well-being. Should be noted that health improvements cannot necessarily be seen as a direct consequence of the provision or enhancement of a green infrastructure network. Important to ensure that the appropriate long-

term governance, ownership, management and funding structures are put in place to make it happen.

CPRE: Supportive of the policy and improving health and reducing health disparities across GM. Sustainable development plays a critical role: reducing the need to travel, developing brownfield sites, creating walkable neighbourhoods and improving air and water quality. Keeping the GB green lungs undeveloped should be an important sub-regional aim.

The GM Cycling Campaign: Proposed that the GMSF should be more ambitious in seeking to improve the lives of GM residents. The GMSF will have a profound effect on health: impact of transport on air quality, active travel, access to jobs, services and recreational facilities, influence on the mix and quality of housing stock. Suggest adhering to the TCPAs Reuniting Health with Planning initiative and full consideration should be given to all of the recommendations in NICE PH8. GMSF needs to incorporate GM Air Quality Action Plan and the Low Emission Strategy recommendations which relate to land use and transportation - reducing private vehicle use and promoting cycling.

Manchester Climate Change Agency: Welcomed the recognition that action on climate change and environmental improvement is a critical component of improving the health of GM citizens.

GM Forests Partnership and City of Trees: Highlighted the link between tree planting and GI and its ability to reduce the risk to human health from the impacts of climate change.

Ms Barbara Keeley MP (Worsley & Eccles South, Labour): Commented that physical inactivity is particularly high in the NW with Salford in particular performing poorly. This inactivity is linked to premature death and associated healthcare costs. As green space is linked to good health and wellbeing is it sensible to reduce the amount? There is large volume of research that supports the positive role that green space in the urban area plays in terms of physical health, quality of life, mental wellbeing, social interaction and work/school performance. Urges the CA to rethink proposals for GB loss in Worsley and Eccles South. Additional concerns were raised on the existing demand on GP services created by new housing developments and the lack of consultation with GPs about housing proposals in their area. Therefore the GMSF fails to take into account the impact of the sizeable developments proposed will have on local health services and other local services.

Peel Group: benchmarks exist for the number of patients required per GP and dentist; that these apply to individual practitioners who can be accommodated either in enlarged or new surgeries; and new developments and the planning system would typically not fund practitioners, which are paid for through the NHS, but may reasonably be expected to contribute to additional or improved facilities to accommodate the additional demand.

Salford Clinical Commissioning Group: Express concern about the lack of consideration of what impact the proposed growth would have on health, social care and other public services. Thought needs to be given to estate design and capacity in the context of other GM plans such as the Health and Social Care Plan Taking Charge. Health and Social Care provision and links need to be planned for new developments. Salford CCG suggest that the relevant CCG must be involved at the earliest stages of plan making, specifically in relation to Salford sites, as this will allow the needs of residents to be met. It is important to stress the time required to develop a health facility, from the sourcing funding, planning and design, and procuring of services. We would suggest an addition that where it is proposed that a development should not comply with a policy that is relevant to health, due to

overriding considerations of viability or the need to balance the policy against other considerations, a full assessment of the health impact of the development is conducted. The relevant CCG must be engaged in this assessment.

Social Inclusion (GM23)

Who Responded

There were 23 submissions to this section. These were from 13 individuals and 11 organisations:

- Friends of the Earth
- Greater Manchester Chamber of Commerce.
- Greater Manchester Cycling Campaign
- Greater Manchester Directors of Public Health
- Peel Group
- Rochdale Boroughwide Housing
- Saddleworth Parish Council
- The Campaign to Protect Rural England, Friends of the Peak District & The NW Transport Roundtable (single submission)
- The Land Trust

Summary of Issues Raised

Natural Environment

Campaign to Protect Rural England: Supportive of Policy GM23. The countryside is free to access and provides families with recreation and leisure benefits, therefore countryside loss must be minimised.

GM Manchester Forests Partnership and City of Trees: It is very important that Greater Manchester adopts a policy towards environmental equity whereby it seeks to ensure that high environmental quality is available for all communities across Greater Manchester. This needs to be incorporated into GMSF as a core principle.

The Land Trust: The policy should include reference to greenspace/infrastructure as another element that could contribute to social inclusion.

Development

Peel: Supports the objective of Policy GM23 to enhance social inclusion. However, the policy lacks the necessary clarity in outlining a series of clear deliverables. For example, whilst the policy states that the skills of residents will be improved, it does not outline what actions will be implemented to do so or how this is relevant to development. As such, its role within the GMSF – a spatial development plan – is unclear and Peel would welcome clarity from the GMCA in this regard. Policy GM23 sets out that the draft GMSF will seek to prioritise the redevelopment of brownfield land. Peel objects to this policy, as set out in response to Policy GM1 in chapter 4.

Greater Manchester Housing Action: The GMSF has the opportunity to create within its strategic growth priority a Decent Homes Standard for private rental. GMSF should also set a Sustainable Housing Development Standard to ensure all new residential builds meet with GM regulations.

Wainhomes Developments Ltd, Richborough Estates: The viability of delivering the optional standards in all new dwellings has not been considered, alongside other key factors such as likely CIL and Section 106 contributions to deliver new infrastructure.

Wainhomes Developments Ltd, Barratt Developments and Richborough Estates:

Bullet point 3: The point should be revised such that it is recognised that the city region must ensure that the right number of housing is built within the right locations through a significant boost in housing land supply.

Bullet point 4: Prioritisation of previously developed land. This infers a sequential approach to site selection on the basis of whether a site is previously developed. Such an approach is inconsistent with the Framework which seeks to "encourage" rather than "prioritise" the development of previously developed land. Mention is made to the Secretary of State appeal decision for Burgess Farm, Salford (APP/U4230/A/11/2157433). Paragraph 14 of the decision letter.

Bullet point 6: requires all new dwellings to be built to the 'accessible and adaptable' standard in Part M4 (2) of the Building Regulations. Whilst there is a need for more accessible homes, it is apparent that no assessment has taken place as to how this need relates specifically to new housing and how needs vary across different tenures and types of housing.

Affordable Housing/Aspirations

Greater Manchester Housing Action: The notable absence of any mention of social or affordable rent baselines contradicts the statements on Social Inclusion made in Chapter 26.

Great Places Housing Group and GM Housing Providers would welcome specific consideration of the infrastructure needs of less affluent areas to enable aspiration and employment for residents.

Rochdale Boroughwide Housing would welcome specific consideration of the infrastructure needs of Rochdale to enable aspiration and employment opportunities for residents. E.g. public transport links to key employment sites with shift patterns.

In spite of the aim of bullet point 3, it is noted that only one allocation in the GMSF identifies any specific allocation for affordable homes (Western Cadishead and Irlam). Other allocations only refer to affordable housing provision in loose terms.

The policy should also include meeting local aspirations for home ownership.

The policy should ensure any increased population will find employment in the local areas.

Manchester Friends of the Earth is supportive of Policy GM23 and recommends that the GMSF should include targets for the amount of affordable housing that should be provided in each development.

Health

Salford Clinical Commissioning Group: Does not believe the plan sufficiently acknowledges existing health inequalities across GM. Would be keen to see greater emphasis given to how this plan can contribute to reducing inequalities.

GM Directors of Public Health: Support the Policy but feel it could include requirements to provide cycling and electric bike infrastructure and to promote cycling as an affordable social means of mobility.

Health will not be improved with the proposed development plans for Irlam and Cadishead.

The policy needs to consider the ageing population.

Other

Campaign for Real Ale: Suggested the following addition to the policy between points 2 and 3:
“Ensuring that local people’s access to community facilities is protected by requiring that any proposal that would result in the loss of such a facility should not be permitted except after detailed consideration of alternatives, impact and viability”

Paragraph 26.0.1: despite the inappropriate use of 'will' in several places sees unlikely to address social inclusion issues.

Other Themes

Design (GM19)

Who Responded

There were 15 submissions to this section. These were from five individuals and 11 organisations:

- Environment Agency
- Friends of the Earth
- Greater Manchester Cycling Campaign
- Greater Manchester Directors of Public Health
- Heyford Developments Limited
- Historic England
- Home Builders Federation
- Saddleworth Parish Council
- The Campaign to Protect Rural England, Friends of the Peak District & The NW Transport Roundtable (single submission)

Summary of Issues Raised

There is general support for the policy but concerns regarding implementation.

Environment

The Environment Agency feel that the policy does not appear to go into wider sustainable design of new buildings and resource efficiency. There is an opportunity to consider how building fabric and design of buildings can support wider GMSF policies (e.g. Green Infrastructure, Carbon etc.). Some additional wording (underlined) to point 8 could be "Provide suitable living conditions, both indoors and outdoors, including high levels of energy and resource efficiency and measures to control the microclimate and, where appropriate and necessary, consider application of property level climate resilience measures".

Greater Manchester Directors of Public Health recommend an additional point about design to ensure carbon neutral and sustainable homes supplied by sustainable energy sources should be included, with reference to climate change.

Manchester Friends of the Earth recommend that Greater Manchester needs to go beyond current national building regulations and adopt a zero carbon standard for new housing and BREEAM excellent for commercial buildings, as introduced in London.

Heritage

Historic England: Given the importance of the historic environment within Greater Manchester it is surprising that Policy GM19 and its associated commentary makes so little reference to it. A need to respond positively to the historic context in which developments might be proposed should be included in the checklist forming part of the policy.

Ramsbottom Heritage Society: Would like to see recognition of Conservation Areas within this policy and the need for high quality design within them that reflects the heritage. Concerned that although the recognition of local distinctiveness is mentioned there are no actions/commitments given to how this will be achieved.

The Church Commissioners for England: Object to Criterion 7 of the policy which seeks to incorporate significant elements of green infrastructure in the design of development. Whilst the provision of green infrastructure into the design of development is important, in order to make the policy sound by being justified and effective, the word 'significant' should be removed as the requirements for green infrastructure should be assessed on a site by site basis.

Accessibility

Greater Sport: Cycle storage solutions need to be incorporated into housing developments. Sufficient, attractive, quality and secure cycle parking provision should be part of every development. Approved cycle design guidance should be used to support this. Space for play and street interaction in new housing developments should be integral to scheme design, not access by car as the first thought. It needs to be easier to walk, cycle or take public transport than use a car.

Greater Manchester Directors of Public Health: This section could include actions to provide suitable ultra-low emissions /low emissions vehicles infrastructure such as electric vehicle and electric bike charge points on new developments.

Highways England support the policy as the requirements of this policy should enable long term travel patterns.

Manchester Friends of the Earth recommend an increase in cycle storage in residential and commercial buildings and encourage the introduction of car free developments.

Natural Environment

The Wildfowl and Wetland Trust: Recommend the following should be added to the list of requirements for design development: Optimise multiple benefits including biodiversity and resilience to climate change from the outset of any development design. Under point 8 of the policy add "and water" to read ' Provide suitable living conditions, both indoors and outdoors, including

high levels of energy and water efficiency and measures to control the microclimate'. Recommend requiring sustainable drainage systems under the list "All new dwellings in Greater Manchester should".

City of Trees and GM Forests Partnership: The policy is focused on design of new developments however existing areas need to also be retrofitted where possible to increase the quality of their public realm; this particularly applies to incorporating high quality green infrastructure into otherwise grey areas.

National Trust: Welcome the ambitions of the policy but question how it will be achieved. Point 6 needs to reference landscape character, sense of place and cultural heritage as ways in which places can create connectedness and raise the human spirit. 22/0/2 justifies this inclusion.

Lancashire Wildlife Trust: This policy is welcomed. We particularly welcome the recognition of the value of Nature to the human spirit and the opportunities sympathetic design offers for the enhancement and reconnection of green infrastructure (including ecological networks).

Nationally Described Space Standards (NDSS)/Accessible and Adaptable Homes and Building Regulations

Heyford Developments Ltd: Support the wording of the policy as it recognises that nationally prescribed standards are the starting point for building design and the building regulations are referenced with an appropriate caveat.

Barratt Developments, The Casey Group, P and D Northern Steels Ltd, Home Builders Federation, Gladman Developments Ltd, Rowland Homes Ltd: Disagree with the blanket application of the Nationally Described Space Standards (NDSS) along with Building Regulation Part M4(2). It is recommended that these aspects of design be addressed at a local level, so as to ensure that their application is only required where it is viable to do so. This raises the procedural issue relating to the interplay between the GMSF and existing/proposed local planning policy, which merits further explanation. The blanket introduction of space standards may actually reduce choice and provides very limited flexibility and the justification for this approach is questioned.

Gladman Developments Ltd: Would caution against any design being too prescriptive. If the GMCA wishes to adopt this standard it should be justified by meeting the criteria set out in the NPPG including need, viability and impact on affordability.

Gladman Developments Ltd: Note that paragraph 22.0.3 provides limited rational for the inclusion of the optional space standards.

Further reasoned justification is required to demonstrate why these proposals are appropriate and necessary across GM and should be subject to viability testing.

Further flexibility is required in this policy and it needs refining to ensure that these specific standards are applied in the locations where they will be needed, however they do not hinder other types of development coming forward.

The GM authorities need to be able to demonstrate that any policy requirement is justified and viable, without this evidence the policy should be removed from the Plan.

The Casey Group: Additional evidence should be provided, specifically relating to viability. Application of blanket minimum space standards across GM - could negatively impact on delivery and could impact on capacity of sites identified. Additional evidence should be provided in order to justify the imposition of the standards.

Persimmon Homes North West:

- The policy refers to no evidence and contains no substantive justification sufficient to explain why the national standard is appropriate or workable in relation to all new dwellings across Greater Manchester, regardless of type, location, site characteristics or viability.
- With reference to part M4 (2) of the Building Regulations it is necessary to reference the March 2015 Ministerial Statement and PPG. If the Government's intention was for this to be the default approach, the policy would have been mandatory rather than optional.
- The reasoned justification fails to explain any such need or why the optional standards must be applied to all residential developments across GM.

Barratt Developments:

- This policy should be re-worded such that it recognises the fundamental linkage between achieving a high quality of life and the support for sustainable economic growth.
- Point 8: Further clarification is required as to what is actually being sought from this policy and whether such requirements are justified and viable.
- It is not clear where the requirement for the optional standards has been evidenced in accordance with the PPG.
- National described space standards are a voluntary policy nationally and it may be appropriate in certain circumstances. However, in other situations it is wholly unnecessary to enforce such a blanket approach given the implications in terms of viability and deliverability. It is apparent that no viability assessment has been carried out regarding the implications of the draft policy.
- Barratt Homes also question the justification for the policy to require all new dwellings to be built to the accessible and adaptable standard in Part M4 (2).
- Whilst there is a need for more accessible homes both nationally and in the city region, it is apparent that no assessment has taken place as to how this need relates specifically to housing.
- It is apparent that viability of delivering the optional standards in all new dwellings has not been considered, alongside key factors as likely CIL and Section 106 contributions to deliver new infrastructure.
- Church Commissioners for England: Whilst the overall aims on Policy GM19 are supported, reference to national space standards and building regulations are superfluous and should be removed.

Home Builders Federation (HBF):

- The policy seeks to introduce the NDSS, unless other local standards exist. This is contrary to the March 2015 Written Ministerial Statement. It is therefore clear that local space standards should no longer be applied.

- The NDSS can only be applied where there is a local plan policy. Given the geographical scale and differing market conditions covered by the GMSF a one size fits all approach should be avoided. The evidence should consider the impact of implementing the NDSS across different areas of GM and differing tenures.
- The HBF is unaware of any evidence which points towards a need or the viability of implementing the NDSS across GM. Given the complete lack of evidence it is unclear how such a policy requirement has been included within the consultation document.
- HBF is supportive of providing homes for older and disabled people and do not dispute the evidence provided within the SHLAA. However, it is considered that the policy lacks finesse by requiring blanket requirements with no regard to the type or location of housing provided. This blanket requirement does not take account of the needs or requirements of various groups or the desirability to be situated closer to services and facilities. There is also no flexibility within the policy to take account of local site characteristics.
- It is unclear why new build dwellings should meet optional standard M4 (2).
- Key pieces of the evidence base required by the PPG (ID56-07) are missing. There is no assessment of the impact the requirement may have upon viability. Likewise there is no information relating to the accessibility and adaptability of existing housing stock. Without these key parts of the evidence base it is impossible to draw conclusions upon whether the policy, and in particular the requirement for all new properties to meet the standard, are proportionate and justified.
- The HBF recommends that the requirement either be deleted or further evidence is provided by the GMCA and the policy amended accordingly.

McCarthy and Stone: Request that the space standards are not applied, or at the least flexibly applied, to specialist older person's accommodation.

GM Housing Providers and Great Places Housing Group: Pleased that innovative design is a significant feature of this chapter and would encourage innovation also in terms of construction materials used. The emphasis on all new dwellings meeting both the nationally described space standards and the Building Regulations 'accessible and adaptable standard' is very welcome, but would prefer for the reference to exceptions to be less prominent within the document. Green Belt development would need to be extremely sympathetic to the surrounding landscape.

Other

Clients want smaller, more affordable apartments and single occupancy in the city centre. Concerns that following the GMSF policy in terms of space could be catastrophic for Manchester in the next 10 years. Beech Holdings would welcome a conversation with anyone associated with the final decision making on the GMSF.

CPRE:

- Recommend that the maximum densities are achieved so Greater Manchester grows upwards to limit outward spread as much as possible. CPRE surprised not to see mention of Neighbourhood Plans in the draft GMSF. High quality design is likely to result in a more desirable and therefore longer lasting and sustainable development than poorly designed standards. CPRE recommends codified design standards.

- A priority should be to build upwards rather than out.
- There is a need for quality and safe design which is important in housing.
- Design for housing and development is important and should specifically seek to deliver inclusive places which meet the needs of people irrespective of age, disability or gender; Strengthen community spirit and integration, with opportunities for social interaction.

Heritage (GM20)

Who Responded

There were 17 submissions to this section. These were from nine individuals and ten organisations:

- Friends of the Earth
- Greater Manchester Directors of Public Health
- Historic England
- Lancashire Gardens Trust
- Ramsbottom heritage society
- Rochdale Boroughwide Housing
- Saddleworth Parish Council
- The Campaign to Protect Rural England, Friends of the Peak District & The NW Transport Roundtable (single submission)

Summary of Issues Raised

Greater Manchester Housing Providers and Great Places Housing Group: Support the commitment to preserve heritage assets, but experience informs them that quality restoration and maintenance is highly expensive.

Gladman Developments Ltd:

- The proposed policy makes no reference to the distinction between designated and non-designated heritage assets and the different policy tests which should be applied to these. Paragraphs 132 to 134 of the Framework relate specifically to designated heritage assets and highlight that the more important the asset the greater weight that should be attached to it. The policies within the GMSF need to make sure that such a distinction is made so as to ensure that they are consistent with the Framework.
- The Framework states that if the harm to a designated heritage asset is deemed to be substantial then the proposal needs to achieve substantial public benefits to outweigh that harm. If the harm is less than substantial, then the harm should be weighed against the public benefits of the proposal including securing its optimum viable use.
- The policies in the GMSF and subsequent Local Plans for the individual districts should therefore make a distinction between the two tests included in the Framework for designated heritage assets to ensure they are sound. Gladman consider it necessary for the GMSF to carry out an assessment of the potential impact of proposed development on heritage assets, as set out in para 129 of the Framework in light of the judgment in FODC v SSCLG and Gladman Developments Ltd.
- Rowland Homes Ltd, P and D Northern Steels Ltd: Submitted comments regarding the approach set out under Policy GM20. That of "preserving and enhancing heritage assets and

"their settings" is out of date with national planning policy relating to the historic environment, as set out in NPPF Paragraphs 131-134. This describes a more discretionary approach, which allows for a greater degree of flexibility, without placing sensitive heritage assets at risk, and would prevent development proposals from being prohibited on heritage grounds where appropriate mitigation is feasible. This approach should be drawn upon to revise Policy GM20, as the GMSF must be in accordance with the most up-to-date national planning policy if it is to be found sound.

Historic England:

- To be found sound, the Spatial Framework should be based on adequate up to date evidence about the historic environment, used to assess the significance of heritage assets (designated and non-designated) and the contribution they make to the local area (NPPF paragraphs 158 and 169). It should also entail an assessment of historic landscape character.
- In terms of the importance attaching to the historic environment of the city the Spatial Framework has much to commend it, but Historic England is not yet satisfied, and the Combined Authority has not yet demonstrated, that it has identified and assessed the particular significance of any heritage assets that may be affected by its proposed site allocations and key areas of intervention (taking account of the available evidence and any necessary expertise) in accordance with the requirements of paragraphs 158 and 169 of the NPPF and our Advice Note no.3: Site Allocations (HEAN3).
- A clearer statement is required to ensure the policies in the Framework and especially that for the conservation, enhancement and enjoyment of the historic environment, are strategic for the purpose of NPPF paragraphs 156 and 185
- The chapter is entitled "Heritage", but ought perhaps to be entitled "Historic Environment".
- There is very little within this policy which is locally specific indeed most of its content could be applied to anywhere in the country.
- In order to better align with the NPPF the policy should be redrafted to be place specific to Greater Manchester.
- Bullet point 1 should be amended to reference the need to sustain, conserve and where appropriate enhance the historic environment, heritage assets and their settings.
- Bullet point 2 - further clarity should be provided to ensure that new development achieves a high standard of design and architecture.
- Bullet point 3 - Whilst the re use of heritage assets is supported, the use of the word 'respectful' would be more suitable than 'sympathetic'. Reference should also be made to the management of heritage assets
- Bullet 4 - Reference should be made to the HER and its long term maintenance
- Bullet 5 - Greater Manchester's industrial heritage is not just canals and mills and includes for example, warehouses, ancillary buildings and railway infrastructure (as the reasoned justification recognises).
- The reasoned justification should also include reference to enjoyment of the historic environment and the various agencies that exist in Greater Manchester to help implement this policy. The reasoned justification makes reference to the importance of heritage in supporting economic growth, yet this is not reflected elsewhere in the Framework in relation to other areas of planning policy (see other comments in the submitted letter).

Ramsbottom Heritage Society:

- Disappointed that there are no actions or commitments in the GMSF that will be fed through to local plans in order to ensure the enhancement of the historic environment. Collation of a database of historic features would help with this.
- Welcome this policy but feel that the status of Conservation Areas should be clearly identified. The Society strongly suggest conservation areas be given a much higher profile in the next version of the GMSF.
- Additional bullet points and Reasoned Justification to the Policy suggested by Ramsbottom Heritage Society:
 - Preserving and enhancing local areas with a high density of heritage assets such as in conservation areas;
 - Increasing of enforceability of protection of heritage assets;
 - Identifying and recording heritage assets.
- Reasoned Justification: Heritage assets are constantly under threat from developments and tend to suffer gradual erosion over time, so that enforcement of policies such as those laid down in conservation areas are needed to maintain preservation. Areas with a management plan which has been accepted by the local council should be used as a basis for a local heritage plan.

National Trust: Welcome the inclusion of the policy but question its strength. It includes no mechanisms by which heritage assets will be protected or enhanced. It does not set a scale of ambition in terms of the contribution the historic environment will make to future prosperity or how effectiveness will be monitored. Policy should include a clear strategy for conservation and access e.g. the policy appears to treat all heritage assets as one and the same, without considering levels of significance, types of heritage, designations and value to society. As a result it is not clear how action will be prioritised and where the main opportunities and risks lie. Not clear how this policy will shape which sites are and are not developed or how it is going to be linked to the allocations process. Concerned that the policy is not strong enough to prevent new development adversely affecting heritage assets. E.g. a critical element of Manchester's cultural heritage is its cultural heritage which is not specifically referenced in the policy and yet several examples of places associated with this heritage have been lost or remain vulnerable.

CPRE: The historic environment is a key cultural reference and an irreplaceable resource, CPRE is therefore supportive of Policy GM20.

Lancashire Gardens Trust:

- Emphasises the importance of the county's Historic Designed Landscapes; much money has been spent by the Heritage Lottery Fund in this area on the restoration of public parks, to the benefit of Greater Manchester rate-payers. It would be deplorable to waste this effort by devaluing these parks.
- There should never be any house-building within a Historic Designed Landscape, or any harmful building in its setting.

Greater Manchester Forest Partnership and City of Trees: Trees that are of heritage value need to be protected from the potential negative effects of new developments and this should be incorporated in this policy.

Canal and River Trust: Policy GM23 (GM20?) is generally supported. It is however considered that the bullet point 1 should refer to "conserving" rather than "preserving" the historic environment. This is consistent with the wording of NPPF (chapter 12 Conserving and Enhancing Historic Environment). Reference to enhancing heritage assets is welcomed and the Trust particularly notes and welcomes reference to the industrial heritage of Greater Manchester including its canals and mills and to the importance of increasing the understanding and importance of the historic environment through archaeological works and recording of lost heritage assets.

Greater Manchester Directors of Public Health: Strongly welcome the GM20 policy. Heritage adds to a sense of place, belonging and community which in turn increases health. Pleased to see reference to natural as well as built heritage sites.

Church Commissioners for England: Under Criterion 2 of this policy, we believe that masterplanning the Commissioner's land sensitively would mean that the heritage assets could be preserved and secured. Reference made to their land at Bow Green Farm, Bowden.

Stockport Council Conservative Group: Recommend the creation of a Heritage Register for Stockport to assess the impact future proposals may have.

Manchester Friends of the Earth:

- Support the policy to maximise the quality of GM's heritage but feel there is no sense in the GMSF that the proposed housing developments will be anything more than the same template used all over the UK.
- All ten GM districts have in their Local Plan heritage section clauses which uphold the conservation and enhancement of heritage landscapes. The NPPF requires that these policies be respected and so the sites (Smithills Hall Park and Hulton Park) should be identified in the coming GMSF. Both sites have documentation reaching as far back as the 12th century and display landscape characteristic from several historic periods.

David P Bentley (ecological consultant):

- Consider Exclusion of Special Landscape Areas as a policy in the GMSF. In those areas identified on the Proposals Map as Special Landscape Areas, any development which is permitted will normally be strictly controlled and required to be sympathetic to its surroundings in terms of its visual impact.
- Policy does not provide any reassurance that these sentiments will not always be overridden by commercial consideration. Would like to see something far stronger and enforceable on this, with real safeguards to local heritage, buildings and architecture. Too often, communities do value their heritage and it is the authorities which decide to override this, often resulting in soulless and featureless developments of no merit.

General feeling that as many buildings as possible must be preserved. Once they have gone they cannot be replaced.

The spatial framework policy on heritage is short on words, short in ideas, and short on specifics. The policy does not explain how it will deliver the statutory requirement of historical assets.

Concerns for the effect on listed buildings and conservation area.

More should be invested in the promotion of heritage assets, museums, archives, heritage trails, and galleries - both in public and private ownership.

Brexit

Who Responded

There were 15 submissions to this section. These were from 13 individuals and two organisations:

- Bolton Friends of the Earth
- Forestry Commission

Summary of Issues Raised

All comments indicate a review of forecasts in light of Brexit, or at least a treatment of opportunities and issues. Some comments concluded that Brexit would lead to reduced migration; some assumed Brexit would lead to poorer economic performance. These account for about two thirds. Some assumed an impact without specifying what that might be (positive or negative). Around two thirds assumed Brexit would lead to reduced housing needs.

Other specific comments include:

- Extra work following Brexit
- Consider an extra section on Brexit opportunities and issues.
- Need to consider the likely effect on the economy of Brexit and the changes that will bring to growth and locations for growth.
- Forecasting requires revisiting with migration a valid barometer to measure.
- Framework was produced pre Brexit
- The GMSF has based all calculations on requirement for housing on a pre-Brexit calculation
- The framework was proposed pre-Brexit, with good economic growth. The reality is different and we could fall into depression. Post-Brexit, i suspect the growth requirement can be scaled back.
- Wait to see what impact of Brexit is
- Why don't you wait for Brexit to have its impact before going ahead with this framework?
- The numbers used are wrong. The 'need' for housing is partially created by the inflow of migrant workers, both EU and non-EU. Suggest a suspension of these house-building plans until government policy on Brexit including on border-free movement of people post-Brexit is known.
- Economic instability following Brexit
- Economic stability following Brexit for such large scale plans cannot be assured.
- Economic growth rate/economic forecasting
- The projected growth rate of 2.5% is unrealistic and should be reassessed in light of the impact of the uncertainty around Brexit. It is possible for actual outcomes to differ from what was predicted, because of unlikely or unforeseen circumstances, especially in the

uncertain climate following Brexit or because of limitations with the available data (or possibly the algorithms used within the forecasting/ projection method).

- GMCA and AGMA Executive Board Meeting on 26 August 2016: GMCA/AGMA admit to ignoring the Brexit vote in choosing to rebut their own forecasters, and, on the hoof make up their own forecast, which is not supported by any documentation whatsoever. They just decided to go with an out of date document from 2015 which their own forecasters had cast aside as no longer accurate. Appendix B is the 2015 document produced before the EU Referendum. No 2016 reassessment was given to the GMCA/AGMA Exec board members. The most important part of the whole assessment was withheld from the Committee, and remains withheld to anyone contributing to the GMSF. The report states: "Following the vote to leave the EU, in July 2016 OE updated their headline UK forecast. OE now expect GDP growth nationally of 1.1% in 2017 and 1.4% in 2018, down from previous forecasts of 2.3% and 2.2% respectively. Moving further out OE's expectations that the UK will not gain access to the single market and that the government will pursue a restrictive approach to immigration mean that by 2030 OE's new projections show the level of GDP at more than 3.5% below where it was in their previous forecast. Since GMFM is based on OE's headline UK forecasts, the downgrading of the UK's growth potential will have a knock on effect to GMFM's baseline forecast economic growth rate when the 2016 GMFM is produced in December 2016". Where is the 2016 document? The report clearly says that everything is to be decided in the next few months so how can the report's authors decide in advance of this by writing their own forecast that ignores the ending of the Free Movement of People (and ignores their own forecasting consultant).
- Listening to the People/Neoliberalism
- Has Brexit not taught you anything about listening to the people instead of pursuing your neoliberal dream?

[Northern Powerhouse](#)

[Who Responded](#)

There were four submissions to this section. These were from three individuals and one organisation; Peel.

[Summary of Issues Raised](#)

Manchester Airport; why is there no provision for a third runway for Manchester Airport?

Achieving the aims of the Northern powerhouse

As a leading city region in the Northern Powerhouse, GM has a particular responsibility to plan positively to ensure that this happens. The draft GMSF simply does not match this ambition. Greater Manchester has a pivotal role to play in rebalancing the national economy. If it is to do so without undermining the growth of London and the South East, it follows that the rate of growth of GM must increase significantly above rates seen in recent decades. The proposed level of development, in particular housing, that the GMSF plans for is woefully insufficient to achieve this.

The key driver of the Northern Powerhouse is improving the performance and raising the GDP of Manchester and the North West, which is currently lagging behind the rest of the UK by 25%. If improving economic output is a key driver size is not everything. Recent studies have shown that

productivity and employment growth rates in the majority of core cities have remained consistently below national growth rates (Martin et al 2014) and there is no clear relationship between urban scale or density and urban productivity for the UK 14 largest cities other than London (McCann 2016).

The metropolitan districts of Leeds, Liverpool, Manchester, Newcastle on Tyne and Sheffield together account for some 20-25% of the North's GVA and employment in services. [SQW] This means that the hinterland accounts for some 75- 80% of GDP and therefore crucial to the success of the Powerhouse.

Other comments:

The Northern Powerhouse concept is a marketing device. It is a grandiose bloated concept that the GM leaders seem to feel they have to justify by developing grand schemes, presumably to demonstrate their visionary ability. But it does not fit with the reality of what people want from Greater Manchester. The widespread taking of green belt in the GMSF is an example of this.

Background Papers

Who Responded

There were six submissions to this section. These were from:

- The Casey Group
- Mary Robinson MP (Cheadle, Conservative)
- Natural England
- Poynton Town Council
- Tata Steel (UK)
- Tatton Estate

Summary of Issues Raised

The population growth statistics are wrong, see Piers Elias study. A 70% target for Brownfield is too low. The framework grossly exaggerates the requirement for retail space. The growing incidence of house working enabled by new technology has not been taken account. Housing density targets on developed areas are far too low.

There are still a number of parts of the evidence base that need to be produced. When the evidence base is complete then it is important that an additional round of consultations should be undertaken before the pre-submission version of the plan is published.

Clarity would be welcomed as to the interplay between the GMSF and the vast quantity of existing planning policy at a local level across the ten authorities within the GMSF.

Premature that no element of the GMSF housing requirement will be met beyond the Greater Manchester boundary. The OAN currently advocated within the GMSF is subject to significant debate, and there is a lack of evidence on the theme of land supply.

It is considered that the ISA will not meet basic legislative requirements of the SEA Regulations. It is necessary to re-consider the strategic and site specific alternatives afresh so that all options are treated fairly and consistently.

Lack of consideration of alternative growth strategies in relation to how the housing and employment needs could be distributed. It is not clear how the split of employment land identified in GM2 has been identified, nor is there any assessment of reasonable alternatives in the Integrated Appraisal (IA) Report. It is not clear how the split of housing land identified in GM5 has been identified, nor is there any assessment of reasonable alternatives in the SA.

The proportion of land allocated to each district does not match OAHN identified for each district. Only three alternatives have been identified that focus on the amount of growth. The preferred amount of growth could be delivered in a number of ways, yet this does not appear to have been explored in the IA.

There does not appear to be a non-technical summary of the IA. Failure to prepare one is viewed as a failure to satisfy the legal requirements of the SEA Regulations.

The Cassey Group: Consider that key evidence base documents are missing and these are essential for plan development to proceed: Joint SHLAA/Urban Capacity Study; Economic Viability Evidence; and GM Infrastructure Delivery Plan.

Tatton Estate: Duty to Cooperate - It is considered Cheshire East response to not being able to accommodate any GM housing need is not backed up with any evidence. It appears other Duty to Cooperate partners have not considered Green Belt review but only their urban areas in terms of meeting GM housing needs. A more holistic Green Belt Review could be considered. It is requested the SW quadrants be subject to further DTC discussions.

Mary Robinson MP (Cheadle, Conservative): There is little evidence in this plan to suggest the impact of the proposed developments in Cheshire East has been adequately considered alongside large scale development in Cheadle, particularly in view of the cross border conurbations and impact on transport infrastructure.

Natural England on Habitat Regulations Assessment:

- Recommend that a screening assessment of the Strategic Allocations is completed as soon as possible.
- Additional test needed explaining the decision to screen a site out.
- Available mitigation column is too generic.
- We would expect the HRA of GMSF to consider impacts on European sites.
- Point 6.4 - more work is needed on the Plan if it is to achieve this.
- Point 6.5 - the screening of the allocations should be able to identify where further consideration of an issue may be required and policy wording can be added to provide guidance for delivery at the Local Plan level.
- Point 6.6 - Air pollution will require careful consideration when screening the allocations. The Plan should provide a steer on where further evidence is required at Local Plan level.
- Point 6.7 - Water pollution, the GMSF should aim to identify strategic allocations that will require further consideration of this issue at Local Plan level.
- 8. Screening Opinion Not entirely clear what further assessment is proposed. Would like to see more information about the impact on European designated sites.

- 8.7 agree that further analysis into potential effects of implementation of the Plan water and air pollution. Advise that the Screening of allocations should inform the targeting of this type of assessment and should be included in the relevant policies.
- Appendix 1: An In-combination assessment needs to address the issues that have been identified in the report. Air quality is a key issue that we would expect to be considered in combination. HS2 has not been considered.

Engagement Statement with Neighbouring Authorities and Duty to Cooperate

- Disagree that it was agreed between planning authorities that the Greater Manchester boundary represents a spatial and economic boundary.
- The south Manchester growth corridor should be specifically mentioned as one of the growth areas on the key diagram for the strategy, and should have specific area-wide policies inserted into Chapter 3, Strategic Locations, as an additional growth area to be considered as a whole.
- Within chapters such as retail and education and skills, there should be policies inserted to suggest that District Planning authorities should work together to assess the impact of the housing proposals considered together upon the existing or any additional perceived need for other service provision such as retail, leisure, schooling or health to serve the additional population need.
- Specific to the south Manchester growth corridor there should be a formal agreement between the Greater Manchester Combined Authority, Stockport and Manchester districts and East Cheshire to work together on individual site proposals within the growth area, in order that the impact of each scheme on the provision of community facilities and functions can be properly considered across the whole growth area treated as one, as a cross-boundary strategic matter.

Poynton Town Council: Not clear that the Duty to Cooperate has been undertaken between GM/Stockport and Cheshire East. Should be closer working on a range of issues including housing. Lack of cooperation means that this version of the GMSF is based on inaccurate assumptions about the nature of cross boundary issues. Particular issue for transport links between Stockport and Cheshire East – which Stockport made representations about to the CEC Local Plan.

[Strategic Housing Market Assessment \(SHMA\)](#)

Who Responded

There were eighteen submissions to this section. These were from:

- Andy Burnham MP
- Barratt Homes
- Carter Jonas
- CPRE
- Daylesford Trust
- Gladman
- GVA
- HBF
- Highways England

- Jones Homes
- Miller Homes
- MWA
- NLP
- P&D Northern Steels
- Peel
- Pegasus Group
- Rowland Homes
- Story Homes

Summary of Issues Raised

Comments on the SHMA were closely related to comments on Housing Policy (GM5), but were more focused on the methodology behind the figure for the Objectively Assessed Need (OAN), as well as assumptions about GM's Housing Market, growth expectations, and phasing of development.

Gladman and HBF: Suggested that the SHMA is unclear in distinguishing 'housing need' and 'housing requirement', and in explaining the relationship between the GM and districts' OAN figures.

Gladman: 'The SHMA is not entirely clear about the status of the overall assessed OAHN for GM (11,360 dwellings per annum 2015 to 2035) and the individual district level OAHNs. Figure 10.1 in the SHMA seems to imply that there are district level OAHNs and the implication is that these are the need targets that should ideally be met in the absence of an agreed redistribution of the need across the overall GM housing market area. Indeed the language used in the draft GMSF is that the district figures are "housing requirements" rather than housing need, suggesting that they are what are sometimes termed "policy on" housing figures.'

The Objectively Assessed Need (OAN) for housing of 227,000 homes over the 20 year plan period has been assessed as being too high by some respondents (primarily private residents, but also some organisations such as CPRE and residents' groups), and too low or unambitious by others (mostly planning consultants/housebuilders).

Those stating that the OAN is too high concluded this for a number of reasons. Many respondents cited uncertainty around Brexit, suggesting that Brexit is likely to result in lower levels of migration and as such the housing figures are based on an overestimate of future population growth. Others have suggested that the average occupancy rate of the homes proposed is too low at 1.3 people per dwelling (such as Mr Kevin Hoyle, GMSF 2008). They have pointed to the fact that at the 2011 Census the average occupancy rate was 2.32 people per dwelling, and so by applying this rate to the population projections in the GMSF, a lower OAN of around 127,000 dwellings would be required. Other respondents have highlighted that the delivery rates needed to achieve the OAN have not been met since the 1940s, so the OAN is unrealistic in terms of how many homes can be delivered.

Other respondents including the Home Builders Federation, Miller Homes, Bellway Homes, stated that the OAN is too low, representing an unambitious target for growth over the plan period. Many of these respondents expressed concerns over the application of the Local Plans Expert Group (LPEG) recommendations as outlined in their report to government (March 2016) to the OAN calculation.

Respondents were generally in agreement with using the 2014 SNPP as a starting point for the OAN calculation, and were also generally in agreement with the applications of the LPEG uplift for 25-44 year olds to redress the low levels of household formation in this age group in the projections (among those who notably disagreed with this uplift were CPRE who stated that the 2014 SNPP is a long term, objective and robust source and should be used without any amendment).

However it was pointed out (e.g. by Carter Jonas) that the 2014 SNPP underestimates migration figures (4,256 net inward migrants p.a. to GM actual as opposed to 2,500 in SNPP), so an uplift may need to have been applied to counteract this. It was also stated by Peel and others that using the 2014 SNPP as a starting point will lead to a trend built on an historic under-supply of housing.

There was some criticism (e.g. from Peel) that the 2015 mid-year population estimates had not been taken into account when calculating the OAN. It was suggested that these should have been taken into account as they suggest a higher population increase than projected in the 2014 SNPP. However CPRE suggested that the 2014 SNHP slightly over-projected the number of households compared to 2015 DCLG household figures.

Many respondents stated that the OAN should have included an uplift due to worsening market signals, as per PPG. The market signals discussed in the SHMA include house prices, rents, transactions, development rates, and it is stated that trends in these areas show that there has been a worsening in affordability in GM in the last few years. Many respondents suggested that at least Trafford, Stockport and possibly also Manchester and the other districts, require a market signals uplift. Emery Planning on behalf of the Daylesford Trust suggest that because there has been an under-supply of housing in the city region 2008-2015 (relative to development plan requirements), this should be redressed either as part of the baseline demographic requirement or as a market signals uplift. They also cite evidence from the Resolution Foundation stating that unaffordability has led to a fall in home ownership, particularly among young people, and conclude that Trafford and Stockport require market signals uplifts. Miller Homes suggested that the SHMA used 'past recessionary trends' to avoid including a market signals uplift.

LPEG recommendations include an affordable housing uplift to increase supply in certain circumstances; many respondents felt that this should have been applied to the OAN. Appendix 3 of the SHMA is an appraisal of house price affordability (calculating the ratio of median house prices to median earnings) and rental affordability (lower quartile rental costs as a proportion of lower quartile earnings) in GM. Respondents point out that although this analysis found 5 out of 10 districts to have a house price ratio of over 5.3 (the benchmark figure), and all districts have rental affordability ratios greater than 25%, no market signals uplift was applied. LPEG guidance suggests that an uplift of between 10 and 25% should be applied to the district OAN in these circumstances to further prevent a worsening of market signals. Although the SHMA states that to do so would have a negative impact on vacancy rates in GM, Peel Group and Carter Jonas have suggested that vacancy rates in GM are below the 3% churn required for a functional housing market, and therefore a market signals uplift is justified. Furthermore, they suggest that the assumptions made as part of the OAN calculation to reduce vacancy rates to the national average figure by 2035 are incorrect, and the level should be kept at 3% to ensure a healthy housing market.

The amendment to vacancy rates in the districts across the plan period received a mixed response. Following LPEG guidance, districts with vacancy rates above the national average will see a gradual

reduction to the average figure across the plan period. Some respondents (such as CPRE) welcomed the move to reduce the vacancy rates to the national average figure. However some respondents argued that in GM vacancy rates are already generally low, and that a figure of a 3% vacancy rate should have been applied through the period as this signals a fully functional housing market. Gladman further questioned whether the guidance had been properly applied, seemingly unclear about whether the vacancy rate had been applied to existing stock or just new stock (seemingly a misunderstanding as the vacancy rate is applied to 'need' figures rather than stock itself).

There was much opposition in the responses to the conclusion that GM constitutes one Housing Market Area (HMA). A number of respondents (e.g. NLP, HBF) suggested HMAs at a district level. They argue that the characteristics of the market in different areas of GM vary widely, and classing GM as one HMA masks these differences, and ignores the variation in market signals and performance across the conurbation (e.g. in the north compared to the south of GM). They stated that Rochdale and Wigan's SHMAs indicate that the districts function as their own HMAs, and Oldham as part of a north-east GM HMA, and so the areas should at most consist of a group of districts, if not only one district.

Other respondents (e.g. Peel, Pegasus Group) suggested that the four HMAs recognised in the 2015 Strategic Options Background Paper 1 (Central, North West, North East and South) are a more realistic reflection of the variation in GM's housing market. However it was noted that compiling data across GM boundaries could prove to be difficult, and as such the districts should be seen as their own HMAs. Gladman and others suggested that although GM does fit the criteria of being one HMA the area is so large and there is enough variation within the area for GM averages to almost be meaningless, masking some real variations between the districts.

A number of respondents (P&D Northern Steels, Pegasus, Rowland Homes) suggested that the OAN should have been produced using Cambridge Econometrics' Chelmer Model. The model uses similar underlying datasets to the OAN produced in POPGROUP. The model has been run using a suggested minimum increase in employment of 1% p.a. over the 20 year period, giving an OAN of 430,000 or 21,400 p.a. However most have suggested that an OAN at around the midpoint of the GMSF figure and the Chelmer Model should be adopted, leading to an OAN of around 16,000 homes p.a. This figure is in line with the OAN suggested by Housing the Powerhouse.

Respondents felt that the mix of housing type is skewed towards apartments and represents an underestimation of the housing need of families. Respondents such as Miller Homes, NLP, and HBF suggested that a focus on high density apartments (accounting for 40-45% of new homes) would mean that there is a lack of family housing to attract and retain young professionals. Many cited the Manchester Independent Economic Review (MIER) which recommended increasing GM's supply of quality family housing in order to better attract and retain the highly skilled workforce needed for future growth.

Conversely, some respondents felt that more focus on higher density apartments in the urban area would be favourable; for example Andy Burnham suggested the plan be refocused on higher density developments on brownfield sites and in town centres. Some respondents suggested that these types of developments might deliver more of GM's affordable housing need than larger strategic sites in the green belt.

The phasing of housing delivery caused concern for some respondents (MWA, GVA, Peel, and HBF). Respondents stated that it was unclear how the phasing had been calculated, and that the proposed approach of increasing development over the plan period is flawed. It was argued that the lower levels of development at the start of the plan could have stifle economic growth, and that there is an over-reliance in the GMSF on large strategic sites (which is part of the reason for the need to phase development as masterplanning needs to be undertaken). Furthermore, HBF suggested that there is no reason to plan for a post-Brexit dip in the construction industry, as there has been an increase in development activity in the past 3 years. However CPRE were in favour of the phasing outlined, but suggested that development rates after 2022 are too ambitious, representing a very high level of development which house builders may not have capacity to fulfil.

[Green Belt Assessment](#)

Who Responded

There were 505 submissions to this section. These were from 426 individuals, 28 couples or other family groups, two unknown people (name not supplied/illegible), and one submission on behalf of two travelling showpeople.

There were eleven submissions from politicians/political organisations:

- Cheshire East Council
- Cllr Paul Lally
- Cllr Robert Hodkinson
- Cllrs Garrido, Compton, Clarkson Members for Worsley Ward
- Councillor Damian Edwardson
- Debbie Abrahams MP
- High Peak Borough Council
- Saddleworth Parish Council
- Stockport Council Liberal Democrat Group
- Tameside Green Party
- Westhoughton Liberal Democrats

There were ten submissions from developers/landowners:

- Cheshire Masonic Properties (Land at 36 Clay Lane, Timperley)
- First Choice Homes Oldham
- George Moss and Sons Ltd (Land at Sandy Lane, Lowton, opposite Moss Industrial Estate)
- Home Builders Federation
- Hughes & Lyon (Land at Downall Green Road, Ashton in Makerfield)
- M&T Lord (Land off Garden Street, Tottington)
- Mr Hadfield (Land west of Failsworth Road, Woodhouses)
- Peel Group
- Rochdale Boroughwide Housing
- Ruth Walton (Land East of Shakerley Lane, Atherton)

There were 12 submissions from other organisations:

- Forestry Commission

- Friends of the Earth
- Greater Manchester Cycling Campaign
- Greater Manchester Public Health Network
- Manchester Climate Change Agency
- National Farmers Union
- Natural England
- Regent Park Golf Club
- Residents Against Inappropriate Developments
- Residents of Wilmslow (RoW)
- Rusholme & Fallowfield Civic Society
- The Campaign to Protect Rural England, Friends of the Peak District & the NW Transport Roundtable (single submission).

Summary of Issues Raised

Comments Criticising the Methodology:

Parcels are too large and lack granular detail to sufficiently reflect the characteristics of sites within them. Assessment of large areas overlooks the Green Belt contribution of smaller sites, therefore leading to misrepresentative and inaccurate conclusions.

The study should be recognising the importance of smaller Green Belt sites which are well contained and contribute little to Green Belt purposes and which could add to the available supply of deliverable land, and therefore the draft GMSF should consider this further.

The assessment does not consider whether any purpose is more important than another and whether weighting is required.

The assessment does not offer any further details as to how the scores have been determined and therefore further commentary is required.

The assessment should have considered parcels against the 5th Green Belt purpose of assisting in urban regeneration by encouraging the recycling of derelict and other urban land. Analysis could have been provided at Borough level or more detailed levels of the extent of available and suitable brownfield sites in the area.

Committed development at new road schemes in the south of the city region such as the A6 and Manchester Airport Relief Road will change the ratings of some parcels and so these need to be reviewed to recognise their reduced contributions to the Green Belt.

Parcels that have 'No contribution' to a particular purpose should be treated as less damaging to that purpose than that of parcels scoring a 'Weak' contribution.

Land which is currently safeguarded has not been assessed for potential inclusion in the Green Belt through any systematic or independent process but has instead been included in an arbitrary manner.

Conflict between the inference that land adjacent to the urban area prevents sprawl and that Green Belt Reviews should be "consistent with the Core Strategy's aim of directing development to the

most sustainable locations". Areas adjacent to the urban area may present the most sustainable options for development.

The definition of sprawl as "spreading out of built form over a large area in an untidy or irregular way" is not considered to be justified and is pre-judging the type of development within an area to fit the definition. An urban edge that is uneven does not automatically mean that development within that area would be untidy or undertaken in an irregular way, particularly where a well-designed development within a robust landscape framework could achieve appropriate 'round-off'.

Where Green Belt land includes recreational land uses such as sports grounds, reservoirs, parkland and golf courses, alongside industrial and commercial uses, that can be protected and enhanced through other policies such as Paragraph 74 of the NPPF, these promontories of land should be critically examined to assess whether their Green Belt designation withstands detailed scrutiny. Their retention is contrary to the purpose of recycling derelict land, is hampering the development of sites within the urban area which are sustainably located and in turn creates pressure for ad hoc release of Green Belt land outside the urban area and planning by appeal.

Evidence from assessment suggests that some parcels should not be developed, therefore concerns are raised as to why the draft GMSF appears to ignore this evidence and propose these areas for development.

Would welcome further discussion or assessments that properly outline how these areas can be developed without causing harm to Green Belt.

Not clear that the assessment justifies the Green Belt release options put forward, local authorities have not had sufficient regard to its conclusions.

Draft allocations conflict with report evidence on the performance against Green Belt purposes, and also with District Local Plan policies which require very special circumstances to be demonstrated.

Assumptions not underpinned by credible evidence on number of homes required, suitable sites, or alternative scenarios such as post Brexit.

Development on parcels scoring as Strong sets a precedent for further consideration of other parcels for development in the future.

[**How the Evidence from the Assessment should be used**](#)

Support development of selected Green Belt parcels as land is unused.

Object to development of selected Green Belt parcels, whether it is land subject to a proposed allocation or land not within a proposed allocation.

Parcels which have a limited contribution against Green Belt purposes supports the consideration of Green Belt sites not currently proposed as allocations. These sites should therefore be considered further for development.

Areas which have 'Strong' ratings against the purposes of Green Belt should be prioritised for retention and not for development unless there is some overriding reason why development should take place on that parcel and no other areas (e.g. brownfield sites, land with lower Green Belt rating etc.) are available.

Comments Received on 2016 GMSF Draft

Suggested revisions to the Green Belt boundary following the conclusions of the assessment.

Suggestions for development of parcels for appropriate Green Belt uses based on local knowledge, such as outdoor recreation.

Administrative Comments

Noting of spelling errors within the appendices often relating to the names of settlements and inconsistencies such as references to locations not relevant to the parcel in question, thereby raising concerns about the accuracy of the wider GMSF.

Proposed Allocations With Reference to Green Belt Assessment

OA20 Woodford - Strategic Area 23 scores as 'Strong' against the purposes of checking unrestricted sprawl of large built-up areas and assisting in safeguarding the countryside from encroachment. Loss of area would mean loss of countryside for residents of Greater Manchester, although the additional housing stock will benefit the affluent suburbs and settlements of Poynton, Wilmslow, Adlington and Alderley Edge in Cheshire East rather than GM.

NG3 Junction 21 M62 - Parcel OH03 (Near Shaw, Oldham) has strong ratings for each purpose. Its inclusion as a proposed allocation overrides the strength of the green belt benefits of this parcel. Once it is developed it would directly link Rochdale and Oldham and undermine the reason for retaining other green belt parcels in this sector.

Comments Relating to Proposed Allocations with No Reference to Green Belt Assessment

OA3 Elton Reservoir - Concerns over the lack of real evidence of need, congestion in area, loss of green space, lack of infrastructure proposed, no facilities in Radcliffe, schools at capacity, flooding, harm to wildlife and habitats and harm to quality of life and wellbeing.

OA24 Sidebottom Fold - Already a large supply of available homes to buy in Stalybridge area, concerns over flood risk.

NG1 A&B Northern Gateway - Raises concerns over lack of capacity to cope with increased levels of development, congestion, lack of services and amenities and likely pressure on these, schools at capacity, and loss of natural beauty close to urban areas. Land is important and should be protected.

How the Green Belt Assessment Conclusions Can Be Progressed By Further Evidence

A Green Belt Review has not been undertaken. To demonstrate that the GMSF has been positively prepared in accordance with the NPPF, and to justify the site selection process, an independent review should be undertaken on individual Green Belt Sites proposed for allocation and those submitted in the 'Call for Sites' exercise. The review can assess the appropriateness of proposals to both add and remove land to/from the Green Belt including their boundaries. Sites should be considered against the purposes of the Green Belt before being tested for their suitability and deliverability. This will ensure enough land is released to meet the identified development needs. It is not clear whether this exercise has been undertaken in identifying site allocations.

An assessment of non-Green Belt land to determine whether it might justify inclusion within the Green Belt should be undertaken in a comprehensive manner as part of the Green Belt Assessment and not merely be a selective process to justify the inclusion of pre-selected sites. Subsequent

decisions about specific sites must then be informed by other planning issues in a logical and transparent process.

An assessment of the value of the Green Belt land is essential to understand which bits can be developed without detriment to the overall benefit of retaining Green Belt.

[Wider Issues of Releasing Green Belt to Meet Needs](#)

Brownfield sites should be the priority over that of Green Belt release. Large number of empty homes. Green Belt release should be a last resort and only at the end of the plan period.

Infrastructure is not in place to support the proposed allocations which are in areas that are already over-developed.

Contrary to national Green Belt policy in the NPPF at Paragraph 87 and 89 which states that new buildings are inappropriate development, which should not be approved except in very special circumstances.

The GMSF itself is not capable of meeting the exceptional circumstances required to release Green Belt land.

Concern about Green Belt land adjacent proposed allocations. There is a need to prevent further urban sprawl and over development on land that forms important green gaps between existing houses and potential new houses. Comments on the wider issues of releasing Green Belt to meet needs:

[Comments from Specific Authorities and Organisations](#)

Chorley Council - Welcomes the Green Belt Assessment and, where appropriate, the re-designation of Green Belt boundaries. Confirmation that there are no changes adjacent Bolton and Wigan boundaries which affect the district.

Poynton Town Council - The assessment fails to reach any overall conclusions on the extent to which each parcel has value, unlike the grading system used by Cheshire East, and therefore the quality of the assessment work is limited and must be questioned as an aid to site selection. There is also no consideration of the impact on adjoining areas in Cheshire East.

High Peak Borough Council - The assessment is based on a robust methodology and welcome the specific references made in the final assessment to the role that parts of the Green Belt have in separating settlements Stockport and Tameside from those in High Peak.

The Campaign to Protect Rural England state that they have not previously been engaged in this assessment and believe it would have been more transparent and beneficial for stakeholders to have been consulted on the robustness of the methodology and surveys.

Comments from the development industry and landowners generally welcome the Green Belt Assessment noting it as a necessary and critical evidence base document, and also the wider decision to consider Green Belt release given the scale of growth needs, tightly drawn Green Belt boundaries and limited availability of housing land outside of the Green Belt. It is viewed generally that exceptional circumstances exist.

Comments from the development industry and landowners that disagree with the assessment ratings on parcels where land interests are being promoted, thereby putting forward their own assessments.

Persimmon and Morris Homes consider that the failure to consider requirements for housing land beyond the plan period is contrary to Paragraph 85 of NPPF. The consequences of the likely reduced amount of existing safeguarded land have not been examined and so it will be necessary to identify new safeguarded land now to ensure that Green Belt boundaries do not need to be reviewed again by 2035. It is vital that some districts with a poor delivery record maintain a reservoir of developable land in cases where it is proposed that a substantial amount of safeguarded land is to be lost.

Peel Land Holdings state there should be a second stage review of the Green Belt following the Green Belt Assessment which is a critical part of the evidence base and that details should be published on this as soon as possible before the next iteration of the GMSF. The approach of the assessment should be amended in relation to how it considers the role of Green Belt in separating neighbouring towns.

Other

Objections to Call for Sites Suggestions With Reference to Green Belt Assessment.

A detailed assessment of existing positive uses of Green Belt should be undertaken.

Economic Evidence/Deep Dives

Who Responded

There were two submissions to this section. This were from Peel Group (landowner/developer) and an individual.

Summary of Issues Raised

Wigan M6 junction 25 has been through a public endure with a government inspector and was removed from Wigan Councils core strategy. All the findings are contained in the government inspector's report 2003. Nothing has changed from this report.

Peel: Alternative scenarios for potential future outcomes have not been considered. Growth figures under-estimate: aspirations (local & national), planned 'game-changing' investments (Northern Powerhouse context), inward migration for job-fill (given the implausibility of fill from the economically inactive).

Population and Household Modelling

Who Responded

There were no submissions to this section.

Summary of Issues Raised

There were no submissions to this section.

Town Centre Report

Who Responded

There was one submissions to this section. This was from Mr Will Brierley.

Summary of Issues Raised

“I support further enhancement of Altrincham. The market has been hugely beneficial, and has grown a number of new businesses around it. A great atmosphere for drinks after work and therefore could promote itself for further office development to support the airport businesses. Requires a better rail service from Hale etc. on the Chester line. And I would support the development of key Green Belt sites.”

Natural Environment Paper

Who Responded

There were four submissions to this section. These were from:

- Natural England
- Three individuals.

Summary of Issues Raised

Support Green Infrastructure

It is considered the methodology of this report is flawed. Most wildlife records are recorded to lesser accurate locations than 100m square and are not verified. Many species such as red and amber listed bird species and notable invertebrates are excluded entirely. The methodology is also incorrectly weighted towards river and SBI sites in the point based system of the study creating a disjointed picture of ecological value.

The use of the report to identifying areas of high ecological value in general and wildlife corridors in particular is limited at best and possibly detrimental.

It is not clear how a report with the flaws of data exclusion, data weighting and subjectivity can deliver GMSF stated policy.

The report fails to say how it will identify areas of crucial biological importance.

Natural England:

It is considered the GMSF does not currently achieve the requirement in NPPF in relation in to biodiversity and green infrastructure

In para 1.4 It is not clear how the most important Ecosystem Services that Green and Blue Infrastructure can provide for Greater Manchester have been identified.

In section 2 it is not clear how the studies referred to have contributed to the evidence base. If not contributed it would make sense to remove them from the report. Maps in this section are somewhat unclear – small scale, no OS layer and lack of keys.

At 3.1.2 has the boundary for the proposed West Pennine Moors SSSI been included in the evidence base?

Datasets from the North West River Basin Management Plan should be used to inform the current status of all water bodies within GM? Regulation 17 of the WFD 2003 requires this

Is there a robust and up-to-date assessment of the needs for open space and opportunities for new provision? Recommend the use of Accessible Natural Greenspace Standard (ANGSt) as a useful tool that can help ensure adequate provision of accessible natural greenspace.

In potential threats to climate change the threat of drought should also be considered as equally important. Further information on this issue can be found within the Environment Agency Drought Plan for the North West.

The opportunities for enhancement sections are currently very generic and do not set out a strategic approach to enhance biodiversity and Green Infrastructure.

In the section on River Valleys and Canals - there is little reference to the strategic priorities for waterbodies to achieve good status/potential under the North West River Basin Management Plan. Should recognise that the majority of watercourses are failing their statutory ecological objectives. Massive amount of further restoration required.

5.1.4 Section appears to be biased towards wetlands around the NIA, rather than looking for wider wetland restoration elsewhere. Recommend that this is expanded to other areas. Opportunities could also include 'Creation or expansion of natural floodplain or priority wetland habitat'.

Historic Environment Paper

Who Responded

There were 3 submissions to this section. These were from one individual and two organisations:

- Historic England
- Ramsbottom Heritage Society

Summary of Issues Raised

Historic England:

- Gaps in data and information
- The economic value of the historic environment in Greater Manchester - The contribution that the historic environment can make to economic growth and tourism has been studied at a national level but there is no information at a Greater Manchester level. This would help understand the contribution it can make towards delivering the aims and objectives of the Plan area including the growth agenda and helping to prioritise areas for further work.
- Local identity, character and distinctiveness - Local identity, character and distinctiveness and its understanding and protection have not been translated into a locally specific and understandable study which can be geographically mapped with local information available to the public. Therefore, without this data, there is a risk there will be further erosion of sense of place and that in delivering the GMSF ambitions for growth, it will fail to contribute greatly to the character and experience of Greater Manchester. This information would also be of use to local authority staff, as well as developers and local interest groups.
- Grade II Heritage at Risk - Although Historic England is responsible for maintaining the register of listed buildings in Greater Manchester, together with the Heritage at Risk register, there is no information on the state of the Grade II listed buildings. Historic England has carried out a number of successful pilot projects in the North West engaging with amenity

and civic societies to undertake such surveys. Further research would help increase the understanding of the state of the historic environment within Greater Manchester and provide opportunities for its conservation and enhancement and to make a contribution towards economic and housing growth. Therefore, there are opportunities within the Framework and its implementation, to identify and contribute towards this project.

- Conservation and archaeology staffing resources - The dwindling of staffing resources has indicated that less than half of the ten local authorities in Greater Manchester have conservation staff and there are risks to the provision of archaeology services and the HER (Historic Environment Record) due to budget cuts. Therefore, there is an opportunity to explore a shared service for the whole of Greater Manchester as part of the evidence base for the GMSF and to ensure that the Framework can be delivered in a way that conserves and enhances the historic environment.
- Conservation areas - The assessments of conservation areas are patchy with many conservation areas not having an up-to-date appraisal or management plan. There is an opportunity to address existing conservation areas, through ensuring that there is up-to-date information which will help increase the understanding of the historic environment in Greater Manchester and highlight any trends and issues within these areas. It is recognised that there is a resource issue due to lack of conservation staff to deliver this. However, there is an opportunity to explore the potential to engage with the local community and amenity groups to undertake this work.
- Greater Manchester Textile Mills Survey - The original survey of the textile mills in Greater Manchester was undertaken in the 1980s and Historic England has commissioned an update to the study for completion in 2017 to understand how many of Greater Manchester's mills survive. This study would help identify key assets and how they can be regenerated to help deliver housing and economic growth in Greater Manchester.
- Historic Environment Record (HER) - The quality and coverage of data in the HER (Historic Environment Record) is patchy as it has been built up in an ad hoc way. Some areas of Greater Manchester have good coverage and reliable data due to previous enhancement surveys whereas other areas have not been studied. There is also a growing backlog of archaeological reports which include desk based assessments, evaluations, excavations, landscape studies, historic building surveys and watching briefs. There are about 1000 reports that have not been entered into the database. These reports (referred to as grey literature) hold a wealth of information on historic settlements and sites across Greater Manchester and are an invaluable resource for local communities to understand and take pride in the historic character of where they live. Entering this information into the database should be undertaken at an early stage as it would be an important component of the evidence base. Dependent on resourcing, the availability of the data as an online, accessible resource should be explored

Ramsbottom Heritage Society

- Ascribe to the view that the GMSF fulfils the requirements of NPPF para 158 or 169.
- The GMSF should protect and enhance historic assets and areas e.g. Delph Conservation Area. These areas should be protected for future generations to enjoy and over development of these areas will be detrimental to historic importance of the area.

Concerned that housing allocations will merge villages together. The areas of green space between former mills and houses should be protected and this in turn would retain the open countryside and area of special historic character.

Minerals and Waste Paper

Who Responded

There were no submissions to this section.

Summary of Issues Raised

There were no submissions to this section.

Flood Risk Assessment

Who Responded

There were two submissions to this section. These were from:

- The Environment Agency
- One individual.

Summary of Issues Raised

Environment Agency

We are currently working with the AGMA planning team on refining the flood risk evidence base and providing technical advice where needed. The aim will be to produce an updated Strategic Flood Risk Assessment (SFRA) at a Greater Manchester scale and this will review all site allocations/inform flood risk policy.

The background paper provides a useful summary of all existing flood risk evidence across Greater Manchester to support the GMSF, however some of this will have been superseded by new modelling/policy guidance and will be out of date. It also states (Paragraph 6.4) that the GMSF allocations have not been covered in any detail by previous SFRA's.

Paragraph 165 of the National Planning Policy Framework (NPPF) is clear that planning policies/decisions should be based on the most up to date information on the natural environment.

The updated SFRA will take forward the recommendations/next steps from the background paper whilst collating all of the evidence from a Greater Manchester perspective (including updated information where available). The SFRA should then be used to appraise the allocations within the GMSF (including new climate change allowances) to ensure appropriate policies are in place (NPPF Paragraph 100) and the sustainability appraisal is further informed with the updated evidence.

Paragraph 7.4

There is reference to the Integrated Assessment (IA) informing the Exception Test for the GMSF allocations. In its current draft the IA only advises that 'appropriate mitigation' should be in place where an allocation is at risk of flooding. However to meet the requirements of the NPPF the IA should set out how the Exception Test will be met using the updated SFRA evidence.

Mr Keith Williams

The document Flood Risk and Water Management Evidence Paper shows on the last page (Page 13) that there are no flood risk issues surrounding the proposed development at Sidebottom Fold

Tameside. But only 2 weeks ago, on 21 November 2016, large parts of the centre of Stalybridge immediately below the proposed site for building, and Huddersfield Road onto which the proposed site adjoins, were severely flooded. The proposed site is on the lower part of the fells that absorbs much of the heavy rainfalls. Building on this land will only increase the flooding of the surrounding area. The answer "No" under the final column headed "Implications for development of GMSF" on page 13 is clearly wrong. A detailed analysis of the flood risk and impact by building on the Sidebottom fold site is clearly required before any proposed development there can be considered.

Spatial Energy Plan

Who Responded

There was one submission to this section, from an individual.

Summary of Issues Raised

Support improvements to housing stock and a reduction in the reliance on fossil fuels. There should be more carbon free energy and incentives.

Accommodating the Land supply Shortfall

Who Responded

There were four submissions to this section. These were from four individuals.

Summary of Issues Raised

Please refer to:

http://gmsf.objective.co.uk/portal/2016consultation/supp_docs?pointId=1478184339563&do=view

Allocations (Comments on Policy GM25 and Comments on Allocations Generally)

Who Responded

There were 446 submissions to this section. These were from 325 individuals and 69 organisations:

- 2BG Ltd
- Barratt Homes Manchester
- Bellway Homes Limited (Manchester Division)
- Bizspace
- Bloor Homes (North West)
- Bridge St Conservation Group
- Britannia Property Group
- Bury Clinical Commissioning Group
- Chorlton Planning Ltd
- City of Trees
- Cornall Holdings Limited
- Cornell Group
- Education Funding Agency
- Frederic Robinsons Limited
- Friends of the Earth

- G and B (North West) Ltd
- Galliford Try North West and Trafford Housing Trust
- George Moss and Sons Ltd
- GLP Limited
- Grasscroft Homes and Property
- Greater Manchester Directors of Public Health
- Home Builders Federation
- Hyde Bank Farm
- J Fitton, M Cooper and H Fitton
- J. Murphy and Sons Ltd
- Jones Homes (NW) Ltd
- Lady Alexandra Beasley and Lady Countess Wilton
- Legal & General Property Partners (Industrial Fund) Limited and Legal & General Property Partners (Industrial) Nominees Limited
- Longcourten Developments Ltd.
- Lostock Residents Group
- MAN Diesel & Turbo UK Limited
- Medlock and Tame Valley Conservation
- Messrs Hughes and Lyon
- Metacre Ltd
- MFC & CHCC
- Millennium Care UK
- Miller Homes North West
- Natural England
- Nexus Planning Ltd
- NolanRedshaw
- Northern Trust Ltd
- NPL Developments
- P Wilson & Company
- P&D Northern Steels Ltd
- Peel Group
- Persimmon Homes North West
- Qualmark Ltd
- Redcliff Estates
- Russell Homes
- Seashell Trust
- Seddon Homes Limited
- Stand Golf Club Ltd
- Story Homes
- Tata Steel (UK)
- Taylor Wimpey Limited
- The Campaign to Protect Rural England, Friends of the Peak District & The NW Transport Roundtable (single submission)
- The Casey Group

- The Coal Authority
- The Daylesford Trust
- The Last Drop Hotel Limited
- Tottington Councillors
- Tottington District Civic Society
- Towerhouse Systems
- UKLP
- United Utilities PLC (Operations)
- Wainhomes NW Ltd
- Woodland Trust

Summary of Issue(s) Raised

GM25

Who Responded

There were 446 submissions to this section. These were from 281 individuals, 12 couples, two unknown people (name not supplied/illegible/incomplete), and one political (Tottington Councillors).

There were 72 submissions from known developers/landowners:

- 2BG Ltd
- Barratt Homes
- Bellway Homes Limited (Manchester Division)
- Bizspace
- Bloor Homes (North West)
- Britannia Property Group
- Campaign to Protect Rural England, Friends of the Peak District & The NW Transport Roundtable
- Cassidy and Ashton
- Cornall Holdings Limited
- Cornell Group
- Frank Marshall and Co
- Frederic Robinsons Limited
- G and B (North West) Ltd
- Galliford Try North West and Trafford Housing Trust
- George Moss and Sons Ltd
- GLP Limited
- Grasscroft Homes and Property
- Hyde Bank Farm
- J Fitton, M Cooper and H Fitton
- J. Murphy and Sons Ltd
- James Taylor (Meadowgate Stables, Urmston)
- Jones Homes (NW) Ltd
- Lady Alexandra Beasley and Lady Countess Wilton

- Land at Fir Lane, Royton, Oldham
- Land at Holcombe Road, Greenmount Road, Bury
- Land south of Bolshaw Road, Heald Green and south of Stanley Road, Stanley Green
- Legal & General Property Partners (Industrial Fund) Limited and Legal & General Property Partners (Industrial) Nominees Limited
- Longcourten Developments Ltd.
- MAN Diesel & Turbo UK Limited
- Manchester [Rugby] Football and Cheadle Hulme Cricket Club (land off Grove Lane, Cheadle Hulme)
- Messrs Hughes and Lyon
- Metacre Ltd (land at Matley Lane, Tameside)
- MFC & CHCC
- Millenium Care UK
- Miller Homes North West
- Mr and Mrs Donelon
- Mr Hadfield (Ian Stevens)
- Mr J Jaskolka (land adjacent to nos. 746 to 752 Ripponden Road, Oldham)
- Mr Jeremy French
- Mr John Burke (Dawn Farm, Leigh)
- Mr Jones (Ian Stevens)
- Mr Kemp (Ian Stevens)
- Mr Philip Cartwright (land adjacent to 351 Hindley Road, Westhoughton)
- Mr. D Jones (land north of Ashton Road, Woodhouses)
- NJL
- NolanRedshaw
- Northern Trust Ltd
- NPL Developments
- P Wilson & Company
- P&D Northern Steels Ltd
- Peel Group
- Persimmon Homes North West
- Phillip and Allen Massey
- Planning Manager Jones Homes (NW) Ltd
- Qualmark Ltd
- Redcliff Estates
- Russell Homes
- Seashell Trust
- Seddon Homes Limited
- Senior Planner Jones Homes (NW) Ltd
- Stand Golf Club Ltd
- Stand Golf Club Ltd
- Story Homes
- Tata Steel (UK)

- Taylor Wimpey Limited
- The Casey Group
- The Daylesford Trust
- The Last Drop Hotel Limited
- Timbertops' site c/o Chorlton Planning Ltd
- Towerhouse Systems
- UKLP
- Wainhomes NW Ltd

There were submissions from fourteen other organisations:

- Bridge St Conservation Group
- Bury Clinical Commissioning Group
- City of Trees
- Friends of the Earth
- Greater Manchester Directors of Public Health
- Home Builders Federation
- Lostock Residents Group
- Medlock and Tame Valley Conservation
- Natural England
- North Education Funding Agency
- The Coal Authority
- Tottington District Civic Society
- United Utilities PLC (Operations)
- Woodland Trust

Summary of Issue(s) Raised

Clarification sought as to whether policy GM25 is applicable to all proposed site allocations or only those over a threshold.

For small allocations the provision of draft policy GM25 would be unduly onerous on the applicant.

There should be a development threshold below which the requirements of policy GM25 will not be applicable.

It is inferred that further site allocations are to be proposed through individual local plans. This needs to be clearer within Policy GM25 or Policy GM5.

Question the approach in the GMSF of placing substantial reliance on the allocation of Strategic Allocations, due to concerns over the availability and deliverability of these sites. An assessment of the likely lead-in times for development on each of the allocations should be carried out. This will probably result in a shortfall of delivery against the GMSF housing target, requiring the allocation of more and smaller sites.

The policy requirements should be adopted on all large development sites and not just those in the framework.

Support the proposal that the GMCA will expect developments to be delivered in a timely fashion, and if not will use new Mayoral CPO powers to ensure needed new development does happen.

Housing

With reference to affordable housing there could be an additional point regarding requirement for new housing to achieve the highest energy efficiency standard in order to maintain affordable annual fuel bills.

Criteria A seeks to maximise affordable housing contributions, given that the affordable housing requirement is to be set in lower order local plans, this is considered an unnecessary element which simply duplicates local policy.

It is unclear how the proposed allocations relate to the delivery of the housing requirement set out earlier in Policy GM5.

The proposed allocations and their relationship to the delivery of the housing requirement and the effect on the Green Belt is a complex matter, the current layout and content of Policy GM25 and the allocations means it's difficult to make connections between these matters.

Note that the draft allocations only seek to meet the minimum housing requirement. Further allocations are deemed necessary to account for the proposed increased housing requirement to meet the actual OAN. Buffer sites and safeguarded sites will play an important role within the area and should be included in the strategy.

It is prudent that the plan contain a buffer of sites to counter any under or none delivery from allocations or windfalls.

Affordable housing in more rural areas should be a minimum requirement to develop land.

Masterplans/SPDs

The requirement for the allocations to be in accordance with a masterplan or SPD could significantly slow down development. Masterplans cannot allocate parts of sites for specific uses, if this is the intention they must be adopted as Development Plan Documents (DPD).

The requirement for a masterplan or SPD to be prepared before development takes place will delay the delivery of new housing across the City Region. More realistic delivery assumptions should be made on these very large sites in terms of delivery in the plan period. The capacity of each of the sites, and particularly the very large 19.23 sites, must be clearly assessed and evidenced. This could mean that the 63,852 figure needs to be reduced further.

Policy GM25 does not explicitly mention the need for public transport connections or transport masterplanning.

The requirement to have an adopted masterplan or SPD in place beforehand will not allow sites to react to changing circumstances, which may happen over the plan period. In this respect paragraph 14 of the NPPF is clear that plans should be flexible to adapt to rapid change and on this basis, this criterion should be deleted. Development sites can stall for many different reasons and it may not be the case that compulsory purchase powers can assist this. Instead the GMSF needs to provide more flexibility and this will assist in housing delivery.

The Plan should be amended to require a masterplan/SPD only for those sites where this is necessary.

Support the need for master planning to provide adequate infrastructure.

Support the need for masterplans or an SPD, they should be developed and adopted in parallel with the GMSF to promote early delivery of sites.

Support the requirement for a masterplan or SPD to be produced. Suggest that the reference to the masterplan or SPD being adopted could be supplemented by a requirement for the masterplan to be formally 'endorsed'. The use of the word 'adoption' might indicate that some formal examination process is necessary.

Green Infrastructure

Green infrastructure (GI) should be specifically included within point 2 of this policy. This should also be included within the reasoned justification where it states that "it will be vital that developments deliver the infrastructure facilities necessary to support them".

Benefit from more information about how consideration of the Green Infrastructure network has informed the site selection process.

It would be helpful to have a commitment that green infrastructure across the larger sites will be planned for and clear guidance on when a masterplan/SPD will be produced.

Recommend the use of minimum Green Infrastructure criteria ensuring access to public footpaths/greenways linked to natural green space.

All potential housing developments should be designed with pedestrian and cyclist priority over motor vehicles provided with ample green space within the development provided with charge points for electric vehicles and electric bikes suitable weatherproof, secure bike storage for properties without garage space.

Heritage

The Combined Authority has not yet demonstrated, that it has identified and assessed the particular significance of any heritage assets that may be affected by its proposed site allocations and key areas of intervention. In accordance with the requirements of paragraphs 158 and 169 of the NPPF and our Advice Note No.3: Site Allocations (HEAN3). The current wording alone would not be in line with national policy and therefore should be amended to read: Development should conserve and enhance all heritage assets and their settings in accordance with their status and significance as well as making a positive contribution to wider features and qualities that create a sense of place, local character and distinctiveness.

Support that development in proximity to Green Belt and heritage must minimize harm.

Viability

Raise serious concerns regarding the lack of viability evidence available at this stage to support the proposed site allocations within the draft GMSF. Without this evidence it is impossible to get an accurate picture of whether the proposed site allocations are likely to be deliverable across the plan period.

Site Selection

Concern in relation to the proposed allocations is a lack of clarity regarding the delivery of the proposed allocations and assumed timescale for delivery. Further, it is unclear what the GM authorities consider to be a strategic site and therefore warrant inclusion within the GMSF, some sites are as small as 20 dwellings to 11,500 dwellings. The GMSF is placing a heavy reliance upon a relatively small number (when you consider it covers 10 LPAs) of very large sites. If any of these fail to deliver as planned it will jeopardise the delivery of the GMSF as a whole.

It is unclear whether the GM authorities have considered alternative approaches including the delivery of a significant number of small/medium sized Green Belt release sites or a hybrid approach combining the two. Furthermore the GMSF remains somewhat vague with regards to the decision making process which has led to the identification of the proposed allocations and whether all of the sites proposed are appropriate, available, deliverable and suitable for Green Belt release.

Insufficient consideration has been given to the re-use of existing land, including greenspaces within urban areas.

Transport Infrastructure

It is noted that many of the large sites proposed have significant infrastructure requirements associated with them (including significant Highways work, Metrolink extensions etc.). It is unclear whether these infrastructure requirements have been robustly considered in terms of delivery and viability. The scale of infrastructure requirements for some of the proposed allocations will have a significant impact on the land values and overall viability.

Concern that such developments to become ghettoised as they are not sufficiently linked to other infrastructure.

Strongly object to the unjustified and inappropriate expectations placed on the development industry to wholly fund all new strategic infrastructure required outside of the urban core.

Policy GM25 does not specifically mention the need for public transport connections or transport masterplanning.

Social Infrastructure

The approach to provision of social infrastructure should be determined on a site by site basis having regard to up to date evidence of existing provision.

Policy GM25 fails to set out targets for walking distance to facilities; schools and surgeries per quantum of development; minimum affordable housing.

Biodiversity

The policy does not specifically reference biodiversity obligations. (Including mitigation and enhancement), ecological networks or Nature Conservation Policy GM8. All allocations must be supported by clear evidence relating to specific selection criteria.

The allocations should consider: Enhancement of existing features, especially on-site hedges, wetlands, woods, aged and veteran trees, watercourses and any geological features; New habitat creation measures; Proportion of green roofs on commercial buildings; Bird and bat boxes; Biodiversity plan for site (or biodiversity incorporated into any scheme for GI/open spaces);

Measures to protect/enhance/link neighbouring/nearby SSSIs or local sites; and Maximise the biodiversity contribution of any SUDS.

[Green Belt](#)

The site allocation policy for development in previous greenbelt land does not specifically recognise that the land was in greenbelt. Therefore it operates only as a policy for the allocated sites.

Objection to the reliance on large Green Belt sites, especially as non-Green Belt alternatives at a smaller scale exist.

The site allocation policy for development in previous Green Belt land does not recognise that the land was previously in Green Belt therefore it operates only as a policy for the allocated sites.

Concern that such developments will become 'ghettoised' as they are not sufficiently linked to other infrastructure.

[Water/Flooding](#)

It will always be appropriate to provide for SUDS they should be mandatory, as should green infrastructure and ecological space within each and every development, with a minimum land area allocated per quantum e.g. every 10 units requires a green-space allocation (not including gardens).

Support the determination that development must mitigate flood risk, provide surface drainage and sustainable drainage methods.

SUDS should be mandatory, as should green infrastructure and ecological space within each development.

Suggest the deletion of paragraph 7 within policy GM25, it is irrelevant, as allocated sites should not have conflicting uses.

[Carbon](#)

Note that policy GM25 fails to set targets e.g. for ensuring that all the housing development is zero-carbon (given the original Government target was for 2016 and this is now 2017), and requiring on-site renewable energy generation targets for industrial and employment sites.

Policy GM25 Part E identifies a requirement for the preparation of a Carbon Assessment for new development proposals. Support for this part of the policy, which sets out a series of pragmatic and deliverable actions which can be taken to reduce carbon emissions

The Carbon Assessment should cover the regulated carbon emissions only as these are addressed by the Building Regulations, which now form the approved mechanism for addressing carbon emissions in new development

The content of the carbon budget statement should be proportional to the nature and scale of the development.

Support for the deployment of decentralised energy in the most appropriate types of new development.

It is highly likely that the Government will update the current 2013 Building Regulations over the lifetime of the GMSF. As such, the application of this policy should be flexible and recognise that

improvements may occur at a national level before encouraging further improvements at the local level.

Part F should be amended to instead require the submission of a carbon budget statement, which would necessitate the exploration of a range of low carbon technologies which may be more appropriate than waste heat schemes.

Development on areas of peat (greater than 1-4m) should be avoided in the GMSF site Allocations. The feasibility of removing and relocating peat presents significant environmental risks and potential release of carbon that should be avoided.

S106/CIL

Developer contributions agreed as part of planning consented should not be renegotiated out of by developers at a later stage.

There should be greater inclusion of how essential it will be for S106/CIL contributions, both capital and revenue to be secured where appropriate to support the viability of these schemes.

Unclear what funding, if any, will be made available to update existing transport infrastructure or to create new infrastructure.

The site allocations themselves should adhere to the policies on development, otherwise there is a risk that the policies to shape development will not be able to affect the outcome e.g. if there are inherent issues with the location of a particular development.

Sport facilities

Noted that some of the allocation policies include a requirement for new sporting facilities. Welcomes the principle of this objective; however it is important that any emerging policies are based on a robust and up to date evidence base.

It is Sport England policy to challenge the soundness of Local Plan documents which are not justified by: up to date playing pitch strategy (undertaken in last 3 years) up to date built sports facilities strategy (undertaken in last 5 years)

The allocations should state that any sport provision will be based on the Local Authority evidence base.

Some allocations include existing sport facilities (e.g. OA5 and OA13) need to consider Sport England's exceptions policy on these sites.

Welcome the general approach of GM25, which will help to ensure that there is a degree of consistency in the delivery of strategic development proposals.

The GMSF should, however, avoid a 'one-size-fits all' approach to new development; what might be helpful for one site could hinder the delivery of another.

Wildlife

Given the diversity of key wildlife habitats and species characteristic of Greater Manchester suggest that SPDs are needed for the Lowland Wetlands and Uplands Landscape Scale Natural Assets

mapped in Figure 2.1 and allocated specific draft policy in GM10 and GM11) on Green Infrastructure and Ecological Networks.

Minerals

In terms of point 7 this point will benefit from additional flexibility to read “Development must ensure the extraction of any viable brick clay, sand and gravel, sandstone and/or surface coal resources where practicable and viable in advance of construction, in accordance with the relevant policies of the GM joint Minerals Plan”.

Support the adherence to policies of the Greater Manchester Joint Minerals Plan.

General Comments on Allocations

Location of Allocations

Object to building on Green Belt and rural land. There are plenty of brownfield sites, build on these instead.

Developers will build on Green Belt first and then argue that the brownfield sites are unsuitable.

There is no detailed survey of existing brownfield sites.

The estimates for the potential to provide housing within the current urban area are low and suspiciously rounded.

Many factors influencing the re-use of land for development will change during the plan period and it is likely that far more sites can and will be made available.

This proposal will create urban sprawl and must be avoided.

All new development must protect agricultural land and provide space for food growing.

The push to enlarge Airport City will detract from the revitalization of the city centre.

There is no site selection methodology in the evidence base for the GMSF.

Growth of New Development

Approve all the housing sites and facilitate the development of more housing.

The projected growth rate of 2.5% is unrealistic and should be reassessed in light of the impact of the uncertainty around Brexit.

Affordable Housing

All new development must have substantial affordable housing.

The majority of housing being proposed will be unaffordable.

Natural Environment and Health

The proposals will fail to improve the well-being of local residents, protect the natural environment, and to tackle climate change and poor air quality.

The carbon reduction target of 60% by 2030 fails to reflect the ambition in the Paris Agreement to aim to keep the rise in global temperatures to below 1.5 degrees. A science-based target of at least 80% by 2030 should be adopted.

The plan does not adequately address the legal requirement to improve air quality across Greater Manchester. There should be a site specific assessment of the plan's impact on air pollution in existing Air Quality Management Areas.

In order to meet carbon reduction and air quality obligations, no new development should be permitted that would lead to an increase in carbon emissions and/or air pollution.

There should be no development in areas of flood risk.

All new development must have access to high quality transport links.

All new development must deliver net increase in biodiversity.

All new development must provide community owned renewable energy generation.

Support for a policy to secure a high quality ecological network across Greater Manchester to provide a significant improvement in biodiversity and enhancing the ability of wildlife to cope with climate change.

The development of well-designed places alongside waterways can make a significant contribution to the success of the waterways themselves and their ability to deliver more active, socially engaged and healthy places. General principles supporting this should apply to all such allocations.

[Built Environment](#)

A building height strategy should be included, directing tall building to town centres.

Make a clear direction on the importance of preserving and enhancing non-designated heritage assets.

[Social Infrastructure and Transport](#)

Current infrastructure including transport, leisure/community facilities, education and health facilities cannot cope with any new development.

More emphasis on Greater Manchester's arts and cultural heritage should be provided.

GMSF schemes should only be agreed once a firm delivery date for public and other sustainable transport for a site is available.

Development will increase congestion.

Gateway sites next to motorways have little prospect for sustainable transport.

The GMSF does not clearly commit to supporting the Northern Powerhouse rail project.

[Developers and Land Ownership](#)

Concerns regarding large sites in multiple ownership that can be compromised by developers working independently. Suggestion of generic text for each allocation to address these concerns.

GM needs to identify and tackle the familiar issues that prevent development of urban land – split ownerships, unrealistic expectations of land value, access, contamination and others.

Why were developers requested to submit their wish list suggestions for this plan?

Developers will provide the minimum amount of facilities and social housing they can get away with.

There is little consideration of how the construction phase of sites will impact on residents.

Airport Gateway

Who Responded

There were 14 submissions to this section. These were from three individuals and 12 organisations:

- Bolton Friends of the Earth
- Environment Agency
- Frederic Robinsons Limited
- Friends of the Earth
- Greater Manchester Cycling Campaign
- Greater Manchester Directors of Public Health
- Manchester Airports Group
- Natural England
- Saddleworth Parish Council
- The Campaign to Protect Rural England, Friends of the Peak District & The NW Transport Roundtable (single submission)

Summary of Issue(s) Raised

The airport should not be a major focus of development beyond its core purpose of an airport.

A buffer should remain between developed areas.

Support for mixed-use development in this location

Extensive high quality green infrastructure needs to be included

AG1 Airport City South

Who Responded

There were 13 submissions to this section. These were from seven individuals and eight organisations:

- Cheshire East Council
- Environment Agency
- Greater Manchester Cycling Campaign
- Historic England
- The Campaign to Protect Rural England, Friends of the Peak District & The NW Transport Roundtable (single submission)
- The Land Trust

Summary of Issue(s) Raised

Points in favour:

"Manchester Airport is supportive of the AG1 site allocation, building on the success of the existing Airport City South Enterprise Zone site and adding to much-needed supply of land for the logistics market. However, we do recognise that there are challenges to develop this allocation fully due to environmental features and the topography."

Points against:

Manchester Airport Group

"There are challenges to develop this allocation fully due to environmental features and the topography."

Ringway Parish Councillors

"Object in the strongest possible terms to the remaining section of land between Sunbank Wood SBI and Cotterill Clough Wood SSSI being allocated for development of any kind"

Site not needed:

Growth forecasts assume a doubling of air traffic; this is unrealistically high, i.e. less development land is needed

Growth of the airport and related uses is environmentally unsustainable in a global context (using the Brundtland definition of sustainability)

The airport should serve its primary purpose only, and not become a hub to attract development per se

The RSS panel strongly advised against making the airport a destination in its own right

Environmental impact:

Sunbank wood, and the wildlife that live there, will suffer if development is allowed right up to its edge; some green space around it is needed

The cumulative impact of growth around the airport, including past development, is unsustainable and doesn't justify the economic 'gains'

Valued countryside with important nature conservation; scepticism that SSSI and SBI afford any real protection

Increased traffic, pollution etc. is contrary to other aims; not sustainable development

"It's obvious that the author of the policy does not understand what ancient woodland is"

Issues:

Sloping topography

Planning history requires the site to be kept open; development could negate the planning permission for other recent developments:

AG1 Airport South (Manchester) has already been assigned as a mitigation area to support Planning Application 100263/OO/2012/S2 (World Logistic Hub)

When Planning Application 100263/OO/2012/S2 - World Logistic Hub was given consent, this 'Green Belt' land was identified as part of the mitigation land permitting approval.

The ponds were created to offset the removal of 17 ponds and associated terrestrial habitat which was home to 'Great Crested Newts'. The protected newts were moved off the development site into an ecological buffer zone and extended mitigation zone. Six receptor ponds and artificial hibernacula were created.

Comments Received on 2016 GMSF Draft

Environmental impacts:

Suggestion that there has been no analysis of natural capital

Development too close to Sunbank Wood (ancient woodland) will damage its ecology, even if the wood itself is not built on

Proposed site boundaries would destroy part of Sunbank Wood SBI and further damage the remaining woodland and Cotterill Clough SBI

Request that the GMSF team "commission an ecological review to assess the impact on wildlife and produce a practical, effective and producible mitigation plan which will be transparent about the losses which will be suffered. The results must be published in manner that they are accessible and understandable to the general public".

Proposal of alternative policy wording to strengthen protection for natural capital

Request for extensive green infrastructure within the developed site

An undeveloped buffer area of at least 15m should be included along the edge of the woodland

Air quality:

Existing open land around the airport helps reduce air pollutants; less open land means more air pollution remains

Impact of air pollution on health

Drainage:

Request inclusion of green SUDS requirement

Access:

A western rail link into the airport from the existing heavy rail line between Ashley and Mobberley (i.e. connecting into the Chester-Manchester service) would offer enormous potential to remove a large number of road trips to and from the airport (and therefore help reduce air pollution) and many railway specialists believed it is eminently feasible.

Heritage:

Listed buildings/assets (Grade II) nearby

There does not appear to have been an assessment of impact on heritage; allocation could be unsound re NPPF

Design criteria should protect the Styal-Quarry Bank Mill heritage area to the south

Location of development and retention of green belt in the runways area will help protect the Styal-Quarry Bank area from harmful development.

AG2 Roundthorn Medipark Extension

Who Responded

There were eight submissions to this section. These were from three individuals and five organisations:

- Bluemantle
- Environment Agency
- Friends of the Earth
- Historic England
- Manchester Medipark LLP

Summary of Issue(s) Raised

- Green SUDS should be required; policy wording suggested.
- Developer supports green belt release to grow the Medipark activity, and agrees with the quantity and general principles behind the allocation.
- The Medipark operator supports the proposal and the outline of potential development (density, Metrolink, etc.).
- Local resident not convinced green belt release in this area is necessary, supports brownfield first.
- "WHAT DO YOU THINK YOU ARE DOING, LEAVE THE GREEN BELT AS IT IS. I have walked the lanes and fields all my life in this area, and it would be like burning books if you develop this area. WRONG, WRONG, WRONG. Develop what you have already, don't destroy the green belt."
- "Many of the residents of the neighbouring Woodhouse Park area will further lose a valuable area of open land which has been used for many years by many local people for recreation purposes, particularly in the fields behind the 3-storey flats on Maismore Road and adjoining allotments. Many people enjoy walking the dogs in this area and greatly value its green and open character as a place for walking, exercising and generally enjoying the outdoors away from the mainly built up residential areas of Woodhouse Park."
- A much larger wildlife population have made their homes in this area e.g. foxes, rabbits, bats, frogs, hedgehogs, and large populations of birds, butterflies and newts. We also believe that development proposals and allocations should also accord with and afford proper consideration to relevant Wildlife, Countryside, Natural Habitats and Protected Species Acts and Regulations
- traffic generation and highway safety issues should also be given thorough consideration
- MAG support the allocation
- Recognition of potential connections with AG3
- An assessment of the impact on the historic environment (grade II listed assets) should be undertaken before the proposal is progressed further.
- The reasoned justification does not give any analysis of the natural capital. Rewording of the policy requested, with text proposed. Recognise need to protect Fairywell Brook.
- Mitigation should include the retention of the open water habitat, ensuring connectivity of the open water habitat and brook and enhancement and management of these and associated semi-natural habitats.
- Extensive high quality green infrastructure needs to be included

AG3 Timperley Wedge, Davenport Green

Who Responded

There were 101 submissions to this section. These were from 90 individuals (some comments were from several people) and 18 organisations:

- Bellway Homes Limited (Manchester Division)
- Bowdon Rugby Club

- Dobbinets Redevelopment Ltd
- Environment Agency
- Friends of the Earth
- Historic England
- Longworth and Taylor Limited
- Province of Cheshire
- Redcliff Estates
- Ringway Golf Club
- Royal London Mutual Insurance Society Ltd
- The Campaign to Protect Rural England, Friends of the Peak District & The NW Transport Roundtable (joint submission)
- The Hut Group
- The Willey Trust
- Timperley Civic Society
- Winners Property Company Ltd

Summary of Issue(s) Raised

General Overview

Many of the responses from landowners support development of the site and consider the number of units to be deliverable with some of the landowners considering potential for slightly more if the site is reconfigured and higher densities are used nearer to Davenport Green. However a few landowners who responded object to development.

Some respondents consider the number of units is too high.

Some respondents and community groups support housing development but consider it should cover less of the area, be nearer to the Davenport Green area and be more affordable.

The vast majority of respondents object to the area coming out of Green Belt and consider the development would result in worse traffic congestion, effect the capacity of other infrastructure and be an unacceptable loss of countryside that destroys the areas wildlife.

Many respondents said brownfield sites in the area must be used for denser housing before any building on Green Belt land. Some specific sites, around Altrincham in particular were named.

More Specific Comments:-

Proposed Development

Close proximity to HS2 and the airport are key to the delivery of development.

A suggestion that land east of Brookes Drive adjoining Hasty Lane should also be removed from the Green Belt.

There is support for requiring comprehensive master planning as it is unclear where infrastructure and housing will be.

Proposed that the sports and recreation facilities should be excluded from the draft allocation but be removed from the Green Belt and reallocated as a new and dedicated Sports and Leisure allocation and extended to land south of Clay Lane.

Comments Received on 2016 GMSF Draft

Land to the south of Alder Drive, west of Fairywell Brook, east of Brooks Drive, and north of Whitecarr Lane should not be considered for development.

A few respondents proposed an alternative boundary to include land adjacent to Roaring Gate Lane and reduce the bulge area closest to Hale resulting in a straighter boundary. This would take less land out of the Green Belt.

Proposals that land south of Shay the Lane to Brookes Drive should be retained in the Green Belt.

It was proposed that as an alternative to development at Flixton and some of Timperley Wedge Altrincham Golf Course could be reduced to nine holes to free up some development land.

Proposal to extend the boundary to include land south of AG3 boundary at Clay Lane and either side of Wellfield Lane.

Suggestions that the area north of Timperley Brook, and to the west of Thorley Lane, may be appropriate for domestic housing development.

Agreement with provision of employment space and opportunities, along with associated regeneration in Roundthorn and Newall Green. However, this area should be restricted to land within the Manchester City boundary.

Suggestion that Humphreys Wood and the Ringway Club house should also come out of the Green Belt.

Land safeguarded for HS 2 south of the Allocation at Hasty Lane should be released from the Green Belt to allow housing once HS2 has been completed.

A totally disproportionate amount of Green Belt land is being re-designated for office and housing needs supported by HS2 that will not run trains until 2033.

It is considered that the proposed HS2 route will result in significant disruption/regeneration within Wythenshawe, so there is an opportunity to implement a scheme in Wythenshawe

Many respondents consider there is more demand for smaller, more affordable properties in Trafford and these are more appropriate for existing/proposed infrastructure and employment opportunities

Some respondents suggested any housing developed in the Shay Lane area should be low density

A few respondents object to the use of land for offices in this area if there is such a need for housing.

Infrastructure:-

Highways England consider the site has potential for the use of rail and tram links but travel by bike or foot for commuting is restrictive. Transport modelling will be needed to assess the potential for impacts on the Strategic Road Network.

Public transport should be delivered prior to development to ease congestion.

Delivery of development needs to be phased against the delivery of infrastructure. It is suggested a fair and proportionate system needs to be in place for developers to contribute to this.

Comments Received on 2016 GMSF Draft

A large number of representations are concerned about the long term investment with roads, schools and NHS provision.

A multi-faith community centre should be considered as part of any local centre.

More than one local centre maybe needed.

There is a need for a decent road from Altrincham to the Airport and Wythenshawe Hospital

Current resources in the Timperley area are already overstretched - schools, doctors, hospitals, roads, car parking pollution etc.

Concerns over HS2 being key to the Justification for this development despite there being no guarantee when/if this will happen. Integration with the HS2 route / development is clearly essential.

It is unclear how the proposed route of the Airport Metrolink, western loop extension links with development

It is considered office development could go ahead without HS2 and 400 units built without infrastructure.

Traffic congestion is a concern mentioned by many representations. Many of the existing lanes and roads are narrow and congestion exists on Wood Lane, Wellfield Lane, Ridgeway Road Thorley Lane Alder Drive, Clay Lane, and Dobbinets Lane. Traffic has increased in the area with Hale Country Club. More traffic will lead to delays to schools, the hospital and the airport.

Development to the west of Fairywell Brook should primarily serve Roundthorn and Newall Green and be accessed from that direction.

It is considered by a few respondents that development will narrow the corridor so much, that any future road will be hard to accommodate

Water and Flooding

There are issues with surface water flooding and sewage in this area that need further investigation.

The Environment Agency recommend including a reference to SUDS, propose minor amended wording and the inclusion of a reference to re naturalizing the habitats and corridors along Fairywell Brook and Timperley Brook as neither Brook is meeting its objectives under the EU Water Framework Directive.

There is an existing UU easement running through the site which will need to be taken into consideration

Green Belt

It is considered the area is important in preventing settlements from merging and although a corridor along Timperley Brook could enhance wildlife, harm to the rest of the site will out way this benefit.

Some respondents agree the northern part of the site has urbanised features and should be allocated whereas the area to the south of the proposed allocation is more rural and agree with it remaining Green Belt.

Consider green belt is attractive to developers because it is much cheaper and less complex to build on.

Little space actually exists between the Airport City developments, Medipark, Wythenshawe and Davenport Green so that these currently distinct areas will be merged into one continuous development area.

There is very little green belt left in the area and any proposed housing or infrastructure to support the airport and South Manchester Hospital should come out of the Manchester boundary and not Trafford.

The green belt incorporating the Timperley Wedge and Davenport Green acts as a buffer and prevents urban sprawl between Timperley, Hale Barns and Wythenshawe, and Manchester Airport.

Concern that development would set a precedent which would lead inevitably to further loss of Green Belt

[**Wildlife, Heritage and Landscape**](#)

There are sites of biological importance in the area which could be encroached upon, damaged or lost. The Wildlife Trusts have suggested revised wording to recognize this. They also consider the effects of the Allocation on the Ecological Network for Greater Manchester should be assessed.

Several respondents are supportive of the high level of Green Infrastructure required in the development

The policy should take account of the species rich hedgerows, mature trees and wildlife especially on Roaring Gate Lane, Whitecarr Lane, Wellfield Lane, Green Lane and wildlife corridors including Fairywell Brook and Timperley Brook.

All future housing developments should make provision for wildlife corridors particularly along Timperley Brook and not allow tarmacading of back gardens or brick walls between houses.

Davenport Green is key to the character of the whole greater Altrincham area

Probable archaeological sites could be affected

The historic pattern of winding lanes provides a setting for the old farmhouses, historic houses on Wellfield Lane and the listed buildings of Davenport Green Hall.

Historic England state an assessment to ensure there is no harm to the historic environment should be undertaken

[**Open space**](#)

Fields and parks are desperately needed to give residents a break/space in suburbia and for health reasons

The existing sports facilities should not be compromised by the development in the area and by being taken out of Green Belt

It is considered if development went ahead local people would be deprived of the only local green space that is accessible and still has the look of open countryside. The rest of the Green Belt has been taken over by sports fields and a leisure club not available to the majority of people

The immediate area provides very little support for recreational Green Belt. There are few public footpaths, narrow (or even no) pavements. Therefore there is an almost complete absence of walkers or cyclists passing down Clay Lane.

Several respondents support the intention to retain and enhance existing sports and recreation facilities to meet the future needs of the local community

Other

Farms for food provision are needed far more than HS2

The land north of Shay Lane is actively farmed so should not be developed.

A few respondents were concerned over air quality and noise in the area.

Western Gateway

Who Responded

There were 31 submissions to this section. These were from 14 individuals (including two local councillors) and 13 organisations:

- Bolton Friends of the Earth
- Environment Agency
- Friends of the Earth
- Greater Manchester Cycling Campaign
- Historic England
- intu Properties PLC
- Natural England
- Peel Group
- Saddleworth Parish Council
- The Campaign to Protect Rural England, Friends of the Peak District & The NW Transport Roundtable (joint submission)
- Warrington BC

Summary of Issue(s) Raised

Natural Environment

Would like to see evidence that the NPPF (paragraph 118) 'mitigation hierarchy' has been applied, when considering the Western Gateway site allocations in the Draft GMSF.

It is not clear how mitigation on Chat Moss is sufficient for all the development coming forward as part of the Western Gateway proposals. With regards to mitigation and compensation contributions should focus on improving the Manchester Lowland Wetland area as a whole.

The Western Gateway allocations should support Greater Manchester Wetlands Nature Improvement Area (NIA) objectives, as well as recognise the presence of designated sites.

Development on this scale would cause environmental harm and put at risk outdoor actives such as horse riding and Manchester United's training ground. There would be loss of much valued rural land.

Air quality is the key issues for the Western Gateway.

A 'growth corridor stretching to Liverpool' is proposed. The open spaces between Greater Manchester and Warrington are a vital wildlife corridor connecting the countryside of Cheshire and Lancashire yet no thought has been given to how this will be preserved or improved.

Any development in this location will need to ensure that key waterbodies are protected and enhanced.

The policy makes no reference to the role of the natural environment in this location or the potential natural capital benefits from net gains in biodiversity.

Request that additional wording is included to reflect to role of the natural environment and the need to protect/enhance key Green Infrastructure assets.

Support the recommendation within the Integrated Assessment that there should also be explicit reference/alignment with the Water Framework Directive (Table 8).

Remediation and environmental risk reduction will be long term activity and high priority for the Environment Agency as the western gateway is in a sensitive environmental location with regards to control waters.

The good quality land on Carrington Moss should be conserved.

Heritage

This strategic location may affect the setting of the heritage asset of Dunham Massey. An assessment of any impacts upon its heritage should inform any development proposals. The current wording ('be sensitive to') sheds no light on what this might mean and does not accord with the requirements of the NPPF.

The allocation has not been informed by any assessment of effects upon the historic environment. As a consequence, the allocation is unsound.

Transport

Investment needs to be directed at more sustainable transport modes rather than be road based.

Research has shown that building more roads and increase highway capacity does not relieve congestion, it attracts further development and increased traffic. Do not support points A and B of Policy SL5.

Point A includes major improvements to the reliability of the M62 and M60 motorways and the local road network. This seems at odds with other aims of the plan to reduce the need to travel and reduce the amount of freight traffic by using rail.

We need to invest in sustainable transport alternatives to single-occupancy car journeys and road freight.

Support proposed heavy rail measures and the extension of Metrolink to Trafford Park.

The Western Gateway is located at the intersection of several key strategic highway routes – including the M62 and M60. Its potential will be further enhanced by the Western Gateway Infrastructure Scheme (WGIS) and new strategic highways infrastructure emerging through the North West Quadrant Study.

Support the proposed range of transport infrastructure which is proposed within the Western Gateway, including the improvements to the capacity of the M62 and M60, and the Metrolink extension.

The delivery of the proposed infrastructure cannot be funded solely by the new developments in the Western Gateway.

It is unclear whether the Metrolink extension to City Gateway and the provision of a park and ride facility within it are feasible or necessary to support growth in this location.

Warrington is closely linked into the North West Quadrant Study, which provides the opportunity for significant enhancements to strategic transport infrastructure to facilitate the Western Gateway and Warrington's future development.

Cannot support 3.5 Western Gateway without a specific high frequency bus service and rapid transit routes or a greatly improved rail service from Manchester through Flixton to Irlam.

Other areas need tram lines to connect to the city centre.

Water transport to link up to the Quays to bring right into the centre.

Additional development will increase the strain on the already heavy congested A56. There appears to be no consideration for this.

Re-opening of the Partington to Timperley rail-link line would be a major benefit to this area. This could be served via trains that connect to Stockport and through to Warrington.

Congestion on the M62 and M60 motorways will need to be addressed.

Existing transport infrastructure will need enhancement by making the A6144 dual carriageway from the M60 through to Partington.

Port Salford

Clarify what is meant by 'a major new port facility'.

How will the infrastructure of the Ship Canal swing bridges survive with the massive ship traffic that will take place? Will people cope with the traffic disruption?

Development at Port Salford to enable more freight to be waterborne is supported. Support for Port Salford in the policy is welcomed.

Other

Vague policies such as ‘a large growth corridor stretching to Liverpool’, Spatial Planning needs to be more precise than this.

Support phasing to manage and monitor large-scale development.

Western Gateway is a trite title.

Do not sacrifice the Salford Greenbelt.

Query if the proposed large scale of development is appropriate.

Strongly support the identification of the Western Gateway as a strategic location for mixed-use growth.

The Western Gateway is a core economic growth area for the city-region.

The wider city gateway opportunity includes the City of Salford Stadium for retail and leisure development; potential investment in City Airport and Heliport and land east of Irlam for residential development. Request that Policy SL5 is amended to reference and support the delivery of the wider City Gateway.

Land east of Irlam is a logical and sustainable location for development which will not undermine the purposes of the Green Belt

Policy SL5 supports the “continued role” of Trafford City as a tourism, leisure and retail destination. In stating that it will simply support its continued role, Policy SL5 significantly underplays the potential of the area to GM and therefore it is requested that Policy SL5 is amended to provide explicit support for the growth of Trafford City. It is also requested that the Trafford City area is designated as a town centre.

The Western Gateway proposals compliment Warrington’s own growth aspirations which provide the basis for the current review of the Warrington Local Plan. Warrington welcomes the explicit requirement in the GMSF Western Gateway for new development to provide the social and physical infrastructure necessary to support an increasing residential and working population, including the requirement for new primary schools, secondary schools and health facilities.

The designation of Flixton to provide 750 houses is wrong. Other than Flixton, support the allocations but Timperley Wedge could provide more homes than specified.

Include references to low carbon/DH networks in strategic locations so that both can be integrated.

No problem with building houses on the old Shell estate at Carrington, but it must be constrained by the borders of the current Shell estate and the Ship Canal. Building up to Birch Road and Sinderland Brook is too far.

The case for developing the sliver of land to the west of Sale is less convincing. This is currently open green space, albeit not landscaped. This area - Sale West - is already heavily developed & has poor transport links (over a mile to a metro stop). It would be better used as parkland.

WG1 New Carrington

Who Responded

There were 33 submissions to this section. These were from 22 individuals and eight organisations:

- Air Products
- Environment Agency
- Friends of the Earth
- Himor Group Ltd
- Historic England
- Trafford Allotment Federation
- Warburton Grain Store Syndicate
- Warburton Parish Council

Summary of Issue(s) Raised

Proposed development

A third of comments support the proposed employment and housing development, and consider that it will provide much needed land for new housing. Whilst many stated their support for the whole site, there were a notable number who supported the development of the brownfield land only.

A number of respondents object to the inclusion of land along the Sale West boundary.

Concern that the proposals to develop along Sinderland Lane will lead to the road being upgraded and pressure to develop the land south of Sinderland Lane.

One respondent considered that the site should be extended to include the wedge of land from Sinderland Way to Firs Way, so that it links with the A6144. This additional land could then provide more affordable housing.

One respondent commented that the 'New Carrington' site name is misleading and that many people were unaware that it includes land adjacent to Sale West.

One respondent commented that the National Trust land should not be included in development sites; this was given to the Trust to preserve it for the nation.

To protect Carrington Moss the green corridor through the middle of the site should be wider.

Warburton Parish Council object to the development of the land south of Partington. They refer to the views of the UDP Planning Inspector who noted the difficulties of integrating development of this site with Partington. They consider that the Red Brook provides a clear and defensible boundary. There are also other constraints, including the proposed HS2 route and gas pipelines.

The National Trust commented that Brookheys Farm is part of the inalienable National Trust estate and is therefore not available for development. The land around Sinderland Lane is a dedicated community woodland and therefore also unsuitable for development.

Request for the land at Midlands Farm to be removed from the site area. The land is part of a commercial farm and there are two mains gas pipelines running through the site which restrict the development potential of the land.

Air Quality

Several comments raised existing air quality issues in the area, and commented that the proposed additional development would make congestion and the resultant air quality issues unacceptable and dangerous to health.

Green Belt

Many comments objected to the inclusion of Green Belt land within the site boundary and considered that this would be contrary to Policy GM13. There was also concern that the loss of Green Belt could also lead to the merging of Carrington and Sale West.

One comment considered that developing land that is currently in the Green Belt will impact on urban regeneration.

Infrastructure

The majority of comments raised concerns about the existing transport infrastructure and considered that additional development would cause unacceptable congestion.

Of particular concern was the risk of further congestion on the A6144 (Carrington Lane), with one comment stating that the proposed new road through the development site to Carrington Lane would cause further congestion at the junction. Concerns were also raised about existing congestion on the A56 and Park Road, as well as the local road network along the Sale West boundary, which would be impacted by the development. Others noted that while improvements would be made to the road network this would not be possible in Flixton/Urmston where the roads cannot be widened.

Some comments were also received about school run traffic, particularly in relation to schools in Sale, Urmston, Lymm and Knutsford.

Comments were received about the existing poor quality public transport infrastructure and the current distance of the site from mass transport links. Several respondents commented on the limited train service from Flixton Station. Others made the case for improvements and stated that residents should be encouraged to travel by public transport or cycle.

One consultee considered that the disused railway line could accommodate a link to the Metrolink system, with connections to the Altrincham and Manchester Airport line, with initial feasibility work suggesting that this is deliverable.

The Trans Pennine Trail wishes to see surface improvements to the existing route

Highways England note the significant infrastructure requirements included in this policy.

Several comments acknowledged the significant infrastructure which would need to be delivered and stated a need for it to be delivered in advance of development. The impact on existing industrial uses on the site needs to be considered as well.

Various comments on the limited capacity of existing primary and secondary schools and the additional demand which will be generated from the development.

Several responses commented on the increasingly limited facilities at Trafford General Hospital and questioned where residents in the new development will access NHS services.

[Green Infrastructure](#)

One comment suggested that the land immediately west of Firs Way should be developed into a Country Park, which could build on the existing woodland area. The area would also be an asset to the existing Sale West community.

The National Trust consider that the land at Broad Oak Farm could be suitable for green infrastructure to support the development.

One landowner commented that the remaining Green Belt area could be used as a ‘Spine of Sport’ to support the development.

[Water](#)

The Environment Agency provided detailed comments, including a need to refer to SUDS in the policy as well as noting that green SUDS have greater environmental benefits than hard engineered options. They also consider that parts of the policy need to be strengthened to ensure they fully support the Water Framework Directive and GM12. They recommend that the policy makes specific reference to the River Mersey and Sinderland Brook. Further to this they provided information on planned schemes for the River Mersey and Sinderland Brook.

Several comments highlighted that the Red Brook is prone to flooding, particularly to the north side

United Utilities commented that consideration must be given to the disposal of surface water in the most sustainable way.

[Nature conservation sites](#)

Many comments stated that the proposed development site will impact on seven separate Sites of Biological Importance (SBI). This would be in conflict with targets for improving the status of wildlife and reducing the rate of loss of natural habitats by 2020.

Natural England suggest that reference should be made to Brookheys Covert SSSI in the policy and any potential impacts from the development should be considered at the strategic planning scale.

Cheshire Wildlife Trust commented that the site covers various nature conservation sites, including SBIs and undesignated ancient woodland and, in accordance with the mitigation hierarchy, these areas must be protected from development. They suggest a 15m buffer is required to protect important habitats. Consideration must also be given to how development of this site would affect the Ecological Network of Greater Manchester.

City of Trees support the requirement for a high level of high quality green infrastructure within this proposed allocation

The Woodland Trust advises that development must be a minimum of 15m from ancient woodland, and that a greater distance may be more appropriate on some sites. The Woodland Trust strongly objects to the proposed New Carrington site allocation.

[Carrington Moss](#)

One petition (131 signatures), as well as a significant number of individual comments, were received regarding the need to protect Carrington Moss and the valuable habitats in this area. The mosses are

one of the most important sites for birdlife in Greater Manchester. Many of the species are of ‘principal importance’.

It was considered that there needs to be a greater awareness of what will be lost if Carrington Moss is built over, with many commenting that there are still traces of the original landscape, not just at Brook Heys Covert SSSI

In relation to wildlife some responses stated that birdlife is concentrated in the fields to the centre of the site and that the area in the proposed green corridor is less important. One consultee also commented that improving the amenity value of the area post development will not address the loss of important bird habitats – managed public amenity does not make an ideal habitat, Sale Water Park is an example of this.

Others commented that the reason Carrington Moss is so attractive to the public is because of the public access which may not be available on the land south of the site.

Heritage

Warburton Parish Council commented on the potential impact on listed buildings and the visual impact on the Dunham Massey estate.

The National Trust is also concerned about the highway impact of the development on the roads around Dunham Massey. Also, given the relatively flat topography to the north of Dunham Massey, new development should conserve skyline views and ensure future development reflects the historic character of the landscape and built environment.

Other

The chairman of the Trafford Allotment Federation raised concerns about the inclusion of the Moss View allotments in Partington in the site boundary. Allotment sites should be protected and their provision should be expanded as part of any development programme.

Several comments referred to the mains gas pipelines which run through areas of the site and will restrict the development potential of some areas.

One comment suggested that for the Sale West area, specifically the land south of Stamford Brook, a road could be built over the brook to link this area with the rest of the development. At present the only way to cross the brook by car is to use Washway Road.

Warburton Parish Council commented that the Duty to Cooperate needs to be demonstrated with Warrington Borough Council in relation to this site.

One consultee considered that the policy should acknowledge the existing industrial uses on the site and the associated HSE restrictions. The policy should explicitly state that only employment uses will be located in the north western area of the site.

WG2 Western Cadishead and Irlam

Who Responded

There were 254 submissions to this section. There were 235 comments from individuals (including 11 from couples and two from local councillors) and eight organisations:

- Environment Agency
- Hamilton Davies Trust
- Historic England
- Persimmon Homes North West
- Planning for our Future in Irlam and Cadishead
- SIPP Trustees Ltd
- The Campaign to Protect Rural England, Friends of the Peak District & The NW Transport Roundtable
- Wainhomes NW Ltd

Summary of Issue(s) Raised

Strong objections were raised by local residents and politicians in relation to the proposed allocation. The most frequently raised concerns were regarding congestion, air pollution, the capacity of community infrastructure and public transport, the impact on wildlife, the loss of land in the Green Belt, grade 1 agricultural land and green space which is of significant community value.

Three separate petitions have been received from the local community containing 25, 68 and 2,056 signatures. All three petitions object to the loss of Green Belt and the petitions containing 25 and 68 signatures also object to the overall scale of development proposed. A community group called Planning for Our Future in Irlam and Cadishead (PFOF) has been established, which strongly objects to the proposed allocation for similar reasons to those making individual representations, as discussed below. PFOF has put forward an alternative proposal for the future development of the area, with a focus on delivering a much more limited level of housing on previously developed sites, increased food growing and improving the area's biodiversity value. PFOF considers that should there be a requirement to release land in the Green Belt for development, the most appropriate site would be land to the east of Irlam. Land to the east of Irlam is being promoted by Peel for residential development through the GMSF. The six local ward councillors submitted a joint statement explaining that they disagree with the scale of housing proposed (2,250 new houses) in the allocation and the removal of 730 acres of land from the Green Belt in Irlam and Cadishead. They also confirm that they do not consider that 1,400 houses should be built on the Boysnape Golf Course (land to the east of Irlam).

In respect of congestion, a large number of local residents expressed significant concerns with regards to existing congestion issues in the area and considered that the proposed allocation would exacerbate these problems. Congestion on the A57, as the single road in and out of the area, was highlighted as a particular concern. Some of the comments suggested that the existing capacity issues could not be resolved due to the surrounding motorway and waterway network, and others stressed the need for additional roads and bridge crossings into the area to address the existing problems. It was suggested that congestion on the M60 impacts on the operation of the A57, both in terms of encouraging 'rat running' through the area and bringing traffic to a standstill on the A57 at peak times. Concerns were also expressed with regards to the cumulative impact of existing and proposed developments, including Port Salford and the proposed A57/M62 link road (which was mentioned most frequently and some of the comments suggested that the proposed link road would worsen congestion in the local area), the AJ Bell Stadium and HS2. A number of the comments suggested that there is insufficient detail in the plan and that it should identify the new infrastructure required to support the development proposed. A small number of the comments

suggested that the access routes into the site are not suitable due to their width, weight capacity and current function.

Concerns were expressed about the area's public transport provision, with suggestions that existing services are limited, overcrowded and unreliable, and in the cases of buses, affected by congestion. Many of the comments highlighted that Irlam Station has limited disabled access. The need for the plan to identify solutions and direct more investment to the area was identified, and calls were made for the Metrolink to be extended to serve the area.

In respect of pollution, concerns were raised with regards to the potential for increased air pollution resulting from additional traffic movements associated with the proposed allocation and other developments in the surrounding area. Many of the comments highlighted the potential health implications associated with increased air pollution and expressed concerns with regards to poor air quality in Salford compared to other areas, suggesting that 'green lungs' such as this site should be protected. Many of the comments suggested that this site (as part of Chat Moss) has a particularly important role in lowering the city's carbon footprint. A small number of comments were received with regards to the potential for noise pollution as a result of the development.

A large number of the comments objected to the loss of land in the Green Belt, and many suggested that there are sufficient suitable previously developed sites and empty properties to meet needs, and that these options should be fully explored before sites in the Green Belt are considered. This site was cited as being important in terms of preventing urban sprawl, and many challenged there being exceptional circumstances for altering the Green Belt boundary. The site's value to the local community as a green space, recreation asset (with walking and cycling being most frequently cited) and education resource was identified in many of the comments received, and the development of this site was strongly objected to on this basis.

In respect of habitats and wildlife, the range of comments received was extensive. Significant objections were made to building on Chat Moss, and the contribution the moss makes to the area's heritage and landscape, the potential loss of peat, release of CO₂, reduction in flood risk and associated air quality and hydrological impacts on the remaining mossland were cited as reasons for this. Many general objections were made with regards to the loss of or impact on wildlife, and a large number of the comments cited the presence of particular species, most frequently birds. Reference was made to the site being important for breeding birds, farmland birds and birds identified on the RSPB's red/amber lists. A large number of the comments questioned how Chat Moss could be enhanced (particularly as a large area of it would be lost). Natural England and The Lancashire Wildlife Trust also challenged how the enhancements to Chat Moss as referred to in the policy would be delivered, and suggested that further consideration should be given to the Nature Improvement Area within which the site is located. Natural England also noted that the site allocation policy fails to identify the site's proximity to Holcroft Moss SSSI (part of Manchester Mosses SAC), CPRE questioned the impact on Cadishead Moss SBI and the Lancashire Wildlife Trust highlighted the absence of any analysis of natural capital in support of the policy.

The site's agricultural value was highlighted in a large number of the comments received, with reference to high grade agricultural land being a limited resource in the UK, and the importance of future food production stressed having regard to the proposed exit from the European Union. It was also suggested that farming is an important part of the area's heritage.

The comments raised concerns with regards to the insufficient capacity of community infrastructure and the potential for further development to worsen the issue in an area where existing facilities are already at capacity and many have already been withdrawn. Schools (both primary and secondary) and doctors were referred to most frequently, however concerns were also raised with regards to dentists, emergency services, social services, shops and services, utilities and leisure facilities. It was considered that there should be a firm commitment within the policy to deliver the infrastructure first.

Some of the comments raised concerns with regards to the overall scale of development proposed, and it was questioned whether this amount of housing is needed, particularly having regard to the UK's proposed exit from the European Union. Concerns were raised around the impact this scale of development would have on the local community and it was suggested that more high density homes should be delivered in the urban areas. The 40% affordable housing requirement was challenged by some developers and others on the basis of the potential for abnormal costs associated with the site's development, and the challenges associated with ground conditions on the site were highlighted. The need for and proposed location of the housing targeted at older people was also questioned.

With regards to flood risk, a large number of the representations considered that the site currently offers flood protection, and raised concerns that its development would increase flood risk in the area. The Environment Agency highlighted that the site's development would need to be subject to a hydrological assessment of the impacts on controlled waters and requested some strengthening to the approach on SUDS.

The site contains a scheduled ancient monument and a grade II listed building. Historic England strongly objected to the allocation and considered that the principle of development could not be considered to be acceptable without an assessment of the effects on the historic environment.

A very small number of local residents expressed support for the allocation, suggesting that some more housing and infrastructure is needed in the area. The Hamilton Davies Trust (a community charity based in Irlam and Cadishead) has indicated that it would support a lower level of housing in Irlam and Cadishead (around 1,300 dwellings) and would support the widening of the area rather than the lengthening of it. The site allocation was also supported by some individuals and organisations with an interest in the land, and the representations indicate that these land interests are generally located in the eastern part of the site. Persimmon Homes has indicated that it would support a lower level of housing development on the eastern part of the site between Irlam and Moss Road, and considers that 2,040 dwellings could be accommodated within this reduced, 116 hectare site. A vision and masterplan document has been submitted by Persimmon in support of this. Network Rail proposed a small addition to the site boundary on land to the south of the railway line.

Wainhomes supports the inclusion of its site (a 3.8 hectare site located within the eastern part of the proposed allocation and also within the area being promoted by Persimmon Homes) within the proposed allocation, and has indicated that it is a deliverable site, which is not considered to be integral to the function of the wider Green Belt. Wainhomes indicates that the site could accommodate 115 family homes and some affordable housing, although the 40% requirement as is currently proposed in the policy is challenged. The representation includes a report which briefly

considers the Green Belt, landscape character and visual amenity, ecology and arboriculture matters.

Warrington Council has requested some further discussion with regards to access, infrastructure requirements and implications for land within their local authority area.

Whilst not specific to this allocation, a large number of the comments received considered that there was insufficient communication regarding the proposals and time available to comment.

[WG3 Port Salford Extension](#)

Who Responded

There were 10 submissions to this section. These were from five individuals, one couple, one councillor, and three organisations:

- Environment Agency
- Historic England
- Peel Group

Summary of Issue(s) Raised

Strong support for the extension to Port Salford was received from Peel Holdings. They did however seek an extension to the allocation to reflect their submitted proposals, including residential development to the West, and requested that some of the additional requirements of the policy were amended or removed.

The most frequently raised concerns with the proposed extension of Port Salford were in relation to the potential worsening of congestion, and related issues on the local transport network, and the impact on habitats and wildlife.

In respect of transport, congestion and inadequate/unreliable public transport services in the area were referred to, with concerns that the proposal would exacerbate existing problems. The impacts of congestion on air pollution and public health were also cited. The potential benefits of a park and ride facility at Port Salford were questioned by some. There was some support for the Metrolink extension and it was questioned why Metrolink could not continue beyond Port Salford to Irlam and Cadishead. One respondent questioned whether Port Salford could allow for ships to hook up to the landside electric supply when in dock, allowing engines to be turned off and thereby reducing pollutants, another commented that all vehicles within Port Salford should be electric.

Friends of the Earth Manchester note that the GMSF site allocations focus on expanding road capacity and consider that the GMSF should rule out new road building and reflect the policy priorities of reducing the need to travel, meeting climate change and air pollution obligations and reducing the dominance of motor traffic. They highlight a number of highway schemes in the appendix to their comments, including the highway infrastructure to support the delivery of Port Salford (new junction on M62 and A57 link road).

In respect of habitats and wildlife, there were concerns raised about the significance of the site in this regard describing that it supports priority habitats and protected species including red and amber rated birds, i.e. those of higher conservation priority. Others wanted to see further analysis of the natural capital of the area including its ecological networks. Natural England and the Lancashire Wildlife trust both sought clarification about the policy requirements in respect of enhancements to

Chat Moss. Natural England referred to the mitigation hierarchy in NPPF paragraph 118 where firstly avoidance should be considered.

There were objections raised to the loss of Green Belt, with some stating that special circumstances had not been shown and that the proposal would lead to continuous urban sprawl. Concerns were also submitted in relation to the loss of the area's "green lung", recreational opportunities (including the golf course), the carbon storage function of peat, and Grade 1 agricultural land. In respect of the latter the importance of food production and food security were referred to. Submissions also referred to the negative impacts that the development of the site could have on physical and mental health relating to increased levels of air pollution and reducing local opportunities for access to open space.

Concerns were raised about the potential impacts that development could have on hydrology, primarily in respect of flood risk. The Environment Agency referred to the new Strategic Flood Risk Assessment being produced for Greater Manchester and that any development would require a full hydrological assessment. A number of responses, including those of United Utilities and the Environment Agency raised the importance of sustainable urban drainage in order to control surface water.

Other concerns were raised in relation to the impact the scheme could have on landscape quality, light pollution, noise pollution, and on local Grade II listed heritage assets. Historic England stated that an assessment of the effects upon the historic environment was needed to demonstrate that development could be achieved without harm in this regard.

A number of submissions questioned the need for an expansion of Port Salford, with some referring to a perceived lack of progress with the consented scheme to the south of the A57 and therefore the need for an extension at this time. Councillors from Irlam and Cadishead Wards agreed that warehousing for Port Salford should be built around City Airport but not on the golf course. Others questioned the overall need for additional industrial/warehouse space, why the Port could not work successfully as permitted, and whether all opportunities on brownfield land had been utilised. A number of respondents considered that all industry should be directed to Trafford Park identifying that the area has a rail terminal and water access.

[**WG4 Land at Flixton Station**](#)

Who Responded

There were 1876 submissions to this section. These were from 1643 individuals, 127 couples or families/groups, six politicians, 28 from unknown people (name withheld or illegible), and four organisations:

- Branley Homes Limited
- Environment Agency
- Historic England
- William Wroe Veterans Golf Society

Summary of Issue(s) Raised

Green Belt

A great number of the comments object to the removal of the area from the Green Belt.

A number of comments consider that the plan does not provide any evidence or exceptional circumstances to support the proposal to remove the area from the Green Belt, it is not clear why this site has been chosen above others and therefore there is a risk the plan will be found unsound.

Concern that classifying Flixton House, Playing Fields and Park as Protected Open Space and removing Green Belt status does not give any long term protection and makes it vulnerable to development in the future.

A new defensible boundary could be created around Flixton House, Park and Playing Fields in order to enable it to remain within the Green Belt.

Flixton already has a low proportion of Green Belt compared to other areas.

The proposed removal of the Green Belt status, will remove a critical boundary between Urmston and Flixton causing the merging of these two distinct areas.

The proposals are contrary to the NPPF.

Other areas are building on less Green Belt than Trafford.

A series of planning applications have previously been submitted and refused on Green Belt grounds.

One respondent commented that building on the Green Belt has to be balanced against the fact that many young people cannot afford to buy a house where they were raised.

Branley Homes support the proposals relating to the larger site, however in the event that the draft proposals do not proceed it is requested that the area to the south of the railway line is removed from the Green Belt for the following reasons: illogical drawing of the original Green Belt boundary, historic use of the land, sustainable location.

Site Selection

A number of the comments consider that the site selection process is flawed and that there should have been a more transparent process, involving the scoring of sites to demonstrate why specific sites have been chosen.

Many of the comments suggested that brownfield sites have been ignored and that these should be developed first.

A number of alternative sites have been suggested such as: Duttons Pond and Millennium Park, Lostock Road and Kingsway Park, Woodsend Road adjacent to Acre Hall School, land between Davyhulme Road and Broadway, Former Mosedales Brickworks, brownfield land along the bank of the Ship Canal from the Mersey to Davyhulme water works, brownfield land adjacent to Neary Way (Trafford Retail Park), Old orchard area near The Bird in Hand pub, Barton Road retail Park, B&Q Stretford, PC World Stretford, areas in Trafford Park, George Carnell Leisure Centre.

One respondent stated that allotments should be redeveloped with new ones designated within the Green Belt funded by developers.

A number of the comments consider that the site has been chosen because the Council stand to gain the most in terms of capital and finance.

A number of respondents considered that if the same selection criteria that was applied to Flixton was applied to Altrincham Golf Course then Altrincham would be a much better option.

Some comments state that there are more golf courses in the south of the Borough and that William Wroe is well used.

It is considered that Altrincham, Hale and Bowdon provide better options for development.

Some of the comments consider that empty houses in and around Trafford should be utilised first.

A number of respondents state that smaller developments would be better and they could be spread across the borough.

There should be a greater focus on urban renewal, regenerating existing areas.

Network Rail would not object to the inclusion of the land at the station in policy WG4 subject to the protection of any infrastructure located on the site and would be willing to work with the relevant authority in order to enable any potential development at the railway station.

Infrastructure

A great number of the respondents consider that existing public transport including rail services cannot cope with current pressures. The rail service has capacity issues and only offers limited services at the weekends.

Bus routes poorly connect Flixton and there is no Metrolink.

Concern that transport infrastructure will not be able to be provided quickly enough after the housing development is completed.

Meeting school demand outside of the area will increase traffic congestion.

The roads cannot cope with the current traffic volume. Development would cause increased congestion.

The car park at Flixton Station is not big enough for shoppers or the park and ride people using it.

Poor/dangerous access to the site close to the station

Enhancements are needed to Carrington Road/ Mile Road/ Carrington Spur to increase capacity.

Significant investment in cycling infrastructure is required along Flixton Road and Carrington Road (and promotion of such resources to increase cycling across the area).

There is no space for additional schools, GP surgeries, and dental practices or for roads to be widened.

The bridge over the railway at Flixton would be structurally compromised with increased flows of traffic.

Highways England commented that although smaller than the other Western Gateway allocations, it is likely to generate significant traffic movements. It is in close proximity to junction 9 and 10 of the M60. Noted that policy does not include any specific infrastructure requirements.

The pressure on public services such as schools, GP's surgeries, dentists and Trafford General Hospital would be hugely increased and these facilities are already struggling to cope with present demand.

The local hospital has been downgraded, losing its A&E.

Schools are already at capacity and there is no scope to extend existing schools.

Spreading out development across the Borough instead of concentrating it in certain locations would enable infrastructure to cope better.

Some commented that they were supportive of the proposals providing that adequate consultation takes place and more information is provided in terms of infrastructure.

The North Education Funding Agency note that the allocation does not make any specific reference to seeking contributions towards the provision of additional school places or the safeguarding of land for new schools. Where there is likely to be a deficiency, it is requested that the allocation includes a requirement for an appropriate level of contribution towards meeting the provision of additional school places generated by the development.

Pollution

Already high levels of pollution in the area and this development will make air pollution worse.

Development would cause increase in noise pollution.

Some respondents questions whether there are proposals to make Urmston/Flixton a Clean Air Zone as mentioned on p83 of the draft plan.

Development would lead to an increase in CO₂ levels, contributing to global warming.

Air quality in the Flixton area will deteriorate further once the Davyhulme incinerator is operational.

Flooding and Water

The land is liable to flooding and there would be an increase in localised surface run off through urbanisation and loss of trees.

When the Mersey overflows, the route to Carrington closes. This is more likely to happen if development goes ahead.

The drainage system cannot currently cope.

The nine-hole golf course Trafford proposes would be unusable during the winter months due to regular flooding.

The Environment Agency has commented that there is no reference to the use of sustainable urban drainage systems within this strategic allocation.

United Utilities has commented that there are several large pressurised water mains and sewers which cut through the site. Also there are existing UU easements which will need to be considered. Consideration must be given to disposal of surface water in the most sustainable way.

City of Trees also suggests that the end of the second paragraph should be amended to include a high level of green infrastructure including Sustainable Urban Drainage Systems (SUDS).

[*Green Space*](#)

The removal of green space will have a negative impact on health and wellbeing.

This is one of the only accessible areas of green space in the area.

The golf course should become a nature reserve or park.

The William Wroe Golf course is an important leisure asset to the community.

[*Covenant*](#)

The Worthington Wright Estate was bought by Urmston Urban District Council in March 1935. The loan was agreed on the proviso that the land was to be used as allotments 17 ½ acres, housing 14 ¼ acres and open green space 186 ¼ acres. The land was secured for all time for the residents of Flixton, Urmston and Davyhulme.

[*Heritage, Wildlife, Landscape*](#)

Flixton House and gardens are Grade II listed and development will ruin the surrounding environment.

There are bats in the trees near Flixton Station.

Bottom's Footpath which runs along the side of the railway line has a Blue Plaque and is of historical significance. The GMSF makes no mention of this and this historic footpath must be preserved.

The Ramblers association state that Bottoms Path runs from Flixton station, beside the rail line to Penny Bridge Lane near the club house of the William Wroe golf course. The RA will vigorously oppose moves to extinguish Bottoms Path or to change the nature and amenity value of the path

Historic England has commented that the site includes a number of Grade II listed heritage assets. The allocation does not appear to have been informed by any assessment of effects upon the historic environment. Without this assessment, the GMSF cannot demonstrate that the principle of development and the quantum (numbers) can be achieved on the site without harm to the historic environment. As a consequence the allocation is potentially unsustainable and therefore unsound.

Cheshire Wildlife Trust has commented that this site incorporates an area of Priority woodland habitat. In accordance with the mitigation hierarchy set out in the NPPF this area must be protected from development. They suggest that a minimum 15 metre buffer is required to protect important habitat. Consideration must be given to how development of this site would affect the Ecological Network for Greater Manchester. A final decision should only be taken once this piece of work is complete and the wider implications for biodiversity are clear.

City of Trees welcome the reference to high levels of green infrastructure. In point 5 it is also suggested that the existing green infrastructure should be considerably enhanced not just enhanced.

In the reasoned justification the deciduous woodland to the south of the railway should be extended and linked up with other woodland habitats if at all possible.

Branley Homes do not consider that the area of land to the south of the railway line forms part of a priority habitat (deciduous woodland) and it should not therefore be protected from development.

[Housing](#)

It is considered that the allocation will not provide any affordable housing.

The scale of this proposed development is oversized in comparison to Flixton (750 houses is too many).

750 extra units should be built at Carrington instead.

[Other Comments](#)

Concern about crime in the area which is bad enough now without potentially being made worse.

This level of growth is not required because of Brexit (figures should be revised)

'Land at Flixton Station' is a misleading title because the allocation also includes Flixton House, the playing fields and William Wroe golf course.

Flixton Village is not included as a Strategic Location in the Core Strategy; therefore it has not been afforded the necessary infrastructure investment.

Trafford have already rejected several applications to develop the Flixton Station site primarily due to access issues.

The Plan needs to have a clear definition for sustainable development.

Safety issue close to the railway track.

Not possible to remodel the golf course. Flixton Golf Club would need to be persuaded to sell their course to the Council, which they are not interested in. A footbridge would need to be built across Church Road to remodel the course.

[Northern Gateway](#)

[Who Responded](#)

There were 77 submissions to this section. These were from 58 individuals, two couples, and one unknown person (name incomplete).

There were three submissions from politicians/political organisations:

- Bury Liberal Democrat Council Group
- Cllr. David Jones
- Saddleworth Parish Council

There were seven submissions from other organisations:

- Bury Business Leaders Group
- Environment Agency

- Friends of the Earth
- Greater Manchester Cycling Campaign
- Natural England
- Rochdale Development Agency
- Campaign to Protect Rural England, Friends of the Peak District & the NW Transport Roundtable (single submission).

Summary of Issue(s) Raised

Comments received objecting to the Northern Gateway sites in NG1 within Bury (A, B & C) as the proposal is too large, too ambitious and is on more elevated land than the surrounding towns therefore making the visual impact even greater.

Communities around the Junction 18 of the M62 in particular are being disproportionately subjected to excessive development of housing and industrial development. This must be redistributed to alternative sites and not concentrated in one location.

The Green Belt land in Prestwich, Whitefield and Unsworth provides an important break between the continuous ‘inner’ urban areas spreading north from Manchester City Centre, as well as between the separate urban communities of Prestwich, Whitefield, Heywood and Middleton.

The character of communities and the quality of life for residents in settlements such as Unsworth and Whitefield would be destroyed. The quaint ancient village character of Simister would be undermined.

NG1a North of M62

Who Responded

There were 296 submissions to this section. These were from 279 individuals, nine couples, and five organisations:

- Environment Agency
- Historic England
- Rochdale Field Naturalists' Society
- Russell Homes (UK) Limited
- The Casey Group

Summary of Issue(s) Raised

Some support for allocation and policy from the development industry, landowners and some members of the general public as the land is generally of low quality and it provides considerable potential for new housing and high quality employment development whilst delivering key infrastructure, and can build on the existing successful business parks in the area.

Wilton Estate and Harworth Estates find the site to be fully deliverable and that it meets the NPPF in being available, suitable and achievable. Exceptional circumstances exist to justify removal of the site from the Green Belt and this includes the significant need to provide employment opportunities to tackle high levels of deprivation in the area which are not currently met by the limited opportunities within the urban area.

Site submissions are put forward for land within the allocation at South Heywood and Whittle Lane.

Other submissions also put forward which request that other Call for Sites submissions on the fringes of the allocation be considered for inclusion.

The scale of Green Belt to be lost in this location is excessive and disproportionate when compared with other locations, being detrimental to the character and quality of life of rural locations such as the village of Birch and a reduction in property values. Little open land would be left between the towns of Heywood, Whitefield, Castleton, Royton, Milnrow, Shaw and Middleton leading to urban sprawl and a loss of identity. Redistribution is required to a greater number of sites.

Concerns about increase in traffic levels, congestion and worsening air quality in the area:

The M60 motorway in this area cannot cope with the level of traffic and even with the smart motorway upgrade this will not relieve congestion, only manage it better. The proposals will overload the network at this location. A transportation assessment is required. Is the proposal consistent with the Department of Transport plans to introduce an orbital relief road?

Public transport in Heywood is extremely poor with no trains or Metrolink and few bus services. There is no rail infrastructure to relieve pressure on the road network, only the East Lancashire Railway.

Air quality is already extremely poor in this area as evidenced by the number of Air Quality Management Areas. These proposals including the focus upon improving the highway network to accommodate additional capacity will only serve to increase emissions and make pollution in the AQMAs even worse.

Some concern expressed about diverting traffic from its current route of M66-M62 to the proposed link road between Junction 3 of M66 and Junction 19 of the M62 which will cause rat-running and will dramatically increase the volume of traffic for residents in South Heywood. A more direct route to the business parks and an environmentally better solution could be achieved by developing a link road from Birch Services.

Objections received to the proposed planning application for a link road from the M62 to the south of Heywood submitted to Rochdale MBC on the subject of traffic congestion and employment land supply.

The NG1a allocation is of considerable importance for biodiversity:

It will have a detrimental effect on one of the last remaining areas of non-intensive farmland and undisturbed open country in the north-east of the county, affecting farmland bird populations which are already in decline.

It has one of the largest meta-populations of great crested newts, is a stronghold for barn owl in the Borough and is probably of SBI value although currently there is inadequate ecological data to make a meaningful assessment of the site's suitability for development.

The Pilsworth Landfill site has been carefully managed with wildlife habitats in mind with the intention to restore the site to its former use as an area for recreation and ecological interest. The site also supports a number of water bodies. Both this site and Pilsworth Fisheries are SBIs and should be recognised as such within the policy, seeking its protection and enhancement, requiring

increased connectivity for wildlife and securing stronger mitigation which guarantees the offset of any loss of private open land.

It is contrary to the GMSF policy on green infrastructure which identifies Brightley and Whittle Brook, and is in conflict with the duty to conserve biodiversity in policy or decision making under the Natural Environment and Rural Communities Act 2006. There is a risk that carving up these areas will result in sterile areas of recreational land with few habitats.

This would result in a devastating loss of open countryside which residents currently enjoy and is not justified. The figures used to suggest the need are vague and unconvincing and neither Bury nor Rochdale Councils have suggested that a need for 1,580,000 square metres is viable.

Industrial space at existing industrial estates is under-utilised at Pilsworth, Stakehill and Milnrow, or has been demolished due to lack of demand and should be considered for development.

The suggestion of building on historical green space at Pilsworth and reverting the tip area to green space is counter-intuitive. Operations at the site should be terminated and the recycling site be turned into a large residential, commercial or logistics area which fulfils the needs of the GMSF whilst retaining the historical Green Belt.

Green roofs should be considered for industrial units if approved to provide new homes for displaced habitats. There is an opportunity here for GM to be a forerunner in wildlife protection.

Objection received to proposed residential development to the west of the site for 200 units as this would result in loss of open countryside and recreational space. This is not justified when there are empty homes within Bury's catchment area.

There are several areas of historical and archaeological importance which would be destroyed by the proposal including Doctor's Moss/Siddall Moor which has peat measuring over 1m in depth and has moderate potential for Bronze Age material, medieval field systems, moated homesteads and settlements dating from the Iron Age and Medieval times.

Natural England state that the masterplan or SPD for the site needs to identify the presence of any protected species focusing on any newt populations, to which it refers to standing advice for protected species. Proposals should create onsite habitats for protected species such as newts or explore options to implement a more strategic solution. Opportunities to enhance any existing greenspace outside of the site allocation boundaries should be maximised to enable new links to existing sites or provide enhancements to neighbouring sites at landscape scale. The inclusion of specific policies to create new green infrastructure opportunities and the formation of a robust network across the Northern Gateway is welcomed. The Masterplans or SPDs should maximise green infrastructure opportunities and provide specific details for bringing forward the site allocations.

Historic England note that the site includes a Grade II listed heritage asset and comment that the allocation does not appear to have been informed by any assessment of effects upon the historic environment which accords with NPPF or Historic England's Advice Note 3. Without this the principle cannot be demonstrated and the quantum of development cannot be achieved without harm to the historic environment and would therefore be potentially unsustainable and unsound. Any

assessment should be undertaken by an appropriately qualified conservation specialist familiar with the site.

The Environment Agency are working with GMCA to update the Strategic Flood Risk Assessment and expect to see any outputs from this work to feed into an updated policy for this site. Brightley Brook is within the site and is identified within EA's investment programme for works within the next 6 years and therefore the GMSF should support this programme and consider how it can be embedded within any Infrastructure Delivery Plan. All watercourses in the site are monitored under the EU Water Framework Directive and are at moderate status, therefore not meeting the required objective under the Directive and North West River Basin Management Plan. Other comments include:

Bullet point 10 of the policy can be strengthened by referring to all watercourses in the site and by going beyond retention to seeking enhancement of key green and blue infrastructure assets.

There is no reference to sustainable urban drainage systems for this site and this should comply with Policy GM25.

Significant concerns are expressed with regard to development at Pilsworth South following restoration due to the potential impact on gas and leachate collection systems and for introducing unacceptable preferential pathways to the water environment, and therefore this part of the site should only be used for the provision of strategic green infrastructure.

Should detailed masterplanning be considered for this site then advice on development adjacent to landfill sites should be taken into account. EA will object in principle to any development within 50 metres of a regulated site.

Highways England note that opportunities to deliver a rail freight spur and improved public transport infrastructure will be explored and comment that this would reduce the potential impact on the Strategic Route Network.

United Utilities highlight that several large pressurised water mains and sewers cut through the site and that there are existing easements which will need to be considered. Consideration must be given to disposal of surface water in the most sustainable way.

City of Trees support the proposed tree planting adjacent motorway corridors to mitigate noise and air pollution, and welcome the commitment to provide an accessible and high quality green and blue infrastructure network. This can provide specified good quality walking and cycling routes. Trees and woodland areas should be protected and enhanced.

Lancashire Wildlife Trust welcome the intent of point 10 in relation to green infrastructure although view that greater specificity is required and suggest a change to wording to ensure mitigation in event of offset of private land is guaranteed and not merely sought. Additional evidence and detail is required on habitats, species and ecological networks in order to comment further. Pilsworth Fisheries should be identified as an SBI in the introductory text. Possible severance of the Pilsworth SBI is an issue and a further requirement should therefore be added to protect, enhance and increase connectivity for wildlife within it.

Russell Homes require that bullet point 2 of the policy be amended to include more specific reference to the proposed link road which is the subject of a current planning application. It is also highlighted that the reference in the justification to the creation of a new primary school and 1000 homes on the western part of the site conflicts with bullet point 7 of the policy which refers to this being on the eastern part of the site.

Viridor Waste Management supports the allocation and has freehold interest in the north-east of the site adjacent Pilsworth landfill.

Other issues raised as part of a standard letter from a large number of respondents relating to a number of allocations in the Bury area but not specific to this allocation:

Bury Council have not communicated the GMSF proposals in a transparent way including how they originated either from residents or developers. Many people are unaware and therefore the general public have had to raise awareness. This is contrary to Bury Council guidelines in the Statement of Community Involvement.

The figure of 12,700 new houses in Bury does not accurately reflect the rate of population growth in the area and so this must be recalculated using reliable, up-to-date information.

Brownfield sites should be considered before Greenfield sites, and more should be done to identify and allocate brownfield sites and derelict buildings and properties.

Need for innovation in meeting housing requirements, such as building above supermarkets.

What guarantees are there that developers will build affordable housing and how can we ensure it is genuinely affordable for local people.

Objection to loss of Green Belt which has health, recreation and quality of life benefits, has local historic importance and cannot be replaced.

Adverse impact on road networks which are already at capacity and there is no feasible way of adequately mitigating this.

Significant air pollution from motorways in area, green spaces needed to offset this. Increase in traffic leads to an increase in pollution, adversely impacting on road safety, health and wellbeing and particularly mental wellbeing if no spaces to enjoy being outside in the fresh air.

Pressure on existing social infrastructure such as schools and doctors surgeries, more information is required on how this will be remedied.

Loss of wildlife and not possible to mitigate the impact of development if building on Green Belt land.

Loss of fields and trees which soak up rainwater, therefore increasing flood risk in an area badly affected by the Boxing Day 2015 floods.

Further work is required by Bury Council/GMCA, also raised as part of a standard letter relating to more than one site, to:

Ensure reasonable steps are taken to communicate these plans to residents including highlighting on local authority websites that these sites are currently in the Green Belt.

Review housing requirements independently to reassure residents that an actual need is to be addressed.

Commission an ecological review to assess the impact on wildlife and a mitigation plan which will be transparent about the losses to be suffered.

Other non-site specific issues raised not as part of a standard letter:

Proposals to reduce traffic flow along Bury New Road will add to the problem of traffic congestion.

There are sparsely inhabited areas to the north of Bury which could be developed rather than the already overcrowded areas of Bury South.

Heywood requires more low-cost/starter housing.

NG1b South of M62

Who Responded

There were 374 submissions to this section. These were from 344 individuals, 13 couples or other family groups, one unknown (name not supplied/illegible), no politicians, four landowners/developers:

- Barratt Homes Manchester
- J G Warhurst
- Mr G Jones
- Mr Michael Crompton

And five other organisations:

- Environment Agency
- Friends of the Earth
- Historic England
- Rhodes/Bowlee Environment Group
- Simister Village Community Association

Summary of Issue(s) Raised

Some support for allocation and policy from the development industry and landowners and some members of the general public as the area is in need of more housing and the land has some scope and potential for development:

Wilton Estate fully support the allocation for housing and view that the site would make a valuable contribution to meeting objectively assessed needs for Bury and Rochdale. The site would contribute to delivery of sustainable development, it is fully deliverable and is regarded as appropriate and suitable when considered against reasonable alternatives. Exceptional circumstances exist which justify the removal of the site from the Green Belt.

Site submissions are put forward for land within the allocation at Rhodes Green, Lower Droughts Farm, Parrenthorn Farm and off Blueball Lane.

Objection to the considerable and disproportionate loss of Green Belt in the Prestwich and Simister area, which will equate to 47% for the Township and 100% for the villages of Simister and Bowlee. This is a large area of natural beauty and one of the few remaining areas of countryside in the North Manchester area.

The area is a highly sought-after place to live where many have paid a premium in order to benefit from the opportunity to live in a sparsely populated area with good access to and views of the countryside. Middleton and the villages of Bowlee and Simister are not overlooked and not overcrowded, the proposals for an urban extension will adversely affect the character of these places and are not wanted. Many disagree that the proposals will be able to respect the character and setting of villages as:

House prices will fall rapidly;

Quality of life will worsen considerably;

Simister and Bowlee are semi-rural farming villages with a strong community spirit and this will be destroyed with such excessive development.

Birch has a conservation area and is suffering from high levels of traffic on Heywood Old Road at present;

Rhodes Green is a secluded quiet hamlet with much character and is one of few examples of a traditional rural Lancashire landscape. This small corner should be removed from the allocation;

Comment on highways capacity:

Simister Lane and other roads in the area are not equipped to cope with large-scale development. Simister village is served by one road which is subject to a lot of equestrian and farm activity and is in some cases single track, and so will need to be widened. Many of the roads are lined with old cottages and some have no pavements. There is only an hourly bus service and there are no shops in the village. There is a risk the village will become a rat-run although the access to the east is currently unadopted.

Heywood Old Road is already at capacity at peak times and is used as a diversion route when the motorways are closed, and sometimes as a short-cut for heavy goods vehicles avoiding the motorway. Reverberations from the road are regularly experienced in properties along this route.

Simister already suffers from poor air quality being close to the M60 and M66 motorways, with vehicle air pollution levels being amongst the highest in the country. This proposal will only serve to make the situation worse.

The proposal will affect a number of existing properties. Fears over likely demolition and Compulsory Purchase Orders. Compensation demands will be widespread.

Some of the land is undevelopable. Much of the site is low-lying and floods large plains after prolonged heavy rain. The Heywood Old Road/Blueball Lane area has a gas main pipeline running underneath it.

The area includes a lot of working farms and paddocks on lease which contribute to Simister's semi-rural village character and offer recreational facilities and fresh produce. Concerns are expressed that these farms and businesses will be forced out with nowhere to go. Loss of production of milk is a serious issue.

NG1B contains some of the last remaining areas of non-intensive farmland and undisturbed open country in the north-east of the county and it is consequently still rich in biodiversity. The environmental impact of losing this area would be disproportionately high. It is home to many forms of wildlife including deer, birds of prey, owls, hares, rabbits and foxes. It contains the only remaining site in Rochdale that still has breeding Tree Sparrows, a species which is on the Birds of Conservation Concern red-list as a priority species. This area is also one of the only remaining breeding refuges in the north-east of the county for other BoCC4 red-listed species such as Skylark, Linnet and Lapwing and amber-listed species such as Stock Dove and Reed Bunting. These are species that have specific ecological requirements to be situated where they are and should not be moved. Great Crested Newts are known to be present near Bowlee and require protection. Barn Owls are a Schedule 1 species and there is a reduction in places in which they can nest. There is potential for areas in Simister and Bowlee to form major green spaces as part of the proposal such as for deer parks or wildlife areas. The area should be surveyed with regards to its ecological importance.

There are a number of Tree Preservation Orders in the site. These should be retained and enhanced as they add to the character of the area.

The setting of the Registered Park and Garden Heaton Park would be adversely affected by residential development up to its north-eastern boundary, particularly affecting long-range views from the park and leaving it disconnected from the wider Green Belt.

Concerns expressed regarding infrastructure and services:

Provision for new schools and additional capacity is paramount. Schools in the area are over-subscribed and underfunded. Simister Lane which serves both Parrenthorn School and St.Margarets Primary School is often dangerous and overcrowded as it is the only access into Simister;

Five hospitals in the area have been closed and merged into one, causing a serious reduction in availability of beds;

Many properties are not connected to the sewerage system and instead use septic tanks;

Poor drainage;

There is very little information about the proposal, particularly on how accessibility will be improved and via what means, which leads to anxiety for local people. The Highways Agency's proposals to remodel the Junction 18 of the M60 have not been taken into account. More details are required.

Historic England note that the site includes a Grade II listed heritage asset and is immediately adjacent a Registered Historic Park and Garden at Heaton Park. Any substantial harm to the significance or loss of a Grade II asset and setting should be exceptional. The allocation does not appear to have been informed by any assessment of effects upon the historic environment which accords with NPPF or Historic England's Advice Note 3. Without this the principle cannot be demonstrated and the quantum of development cannot be achieved without harm to the historic

environment and would therefore be potentially unsustainable and unsound. Any assessment should be undertaken by an appropriately qualified conservation specialist familiar with the site.

The Environment Agency are working with GMCA to update the Strategic Flood Risk Assessment and expect to see any outputs from this work to feed into an updated policy for this site. Whittle Brook flows to the north of the site and is at moderate status under the Water Framework Directive, meaning it is not meeting the required objective under the Directive and North West River Basin Management Plan. The policy can be strengthened by referring to the protection and enhancement of Whittle Brook and a requirement for a corridor of strategic green infrastructure. Sustainable urban drainage should be in the form of either soft or green SUDS to support Policies GM18 and GM25.

Highways England find that the policy states that the site will benefit from improved access to motorways interchanges and there is a requirement to upgrade the wider highways network, although there is no reference to any specific intervention on the network or any contribution towards it. The requirement to facilitate new connections across the M62 to enable more trips by walking and cycling is noted, and whilst this is welcomed, significant work will be required to reduce the severing effect which could include new or upgraded bridges.

United Utilities highlight that several large pressurised water mains and sewers cut through the site and that there are existing easements which will need to be considered. Consideration must be given to disposal of surface water in the most sustainable way.

Lancashire Wildlife Trust note that the Streams and Flushes near Bradley Hall Farm SBI is within the allocation and supports a small stream valley with diverse flora and acidic grasslands, although this not any biodiversity issues are mentioned within the text and should be added for clarity. Amended wording is suggested in terms of requirements to protect and enhance the SBIs on site and to link with other areas of the ecological and green infrastructure networks. Additional evidence and detail is required on habitats, species, ecological networks, designated wildlife sites and their criteria for designation in order to comment further.

City of Trees view that the green infrastructure and SUDS requirements need strengthening, particularly point 4 which should refer to extensive areas of green infrastructure.

Rhodes and Bowlee Environment Group are concerned that the character of Rhodes and Bowlee will be adversely affected and highlight that this land was designated to separate the boroughs of Bury and Rochdale. If allowed this will lead to urban sprawl therefore destroying any sense of separation. Heywood Old Road is often used as a diversion route and so additional traffic will be dangerous and intrusive for residents both visually and in terms of noise pollution.

Other issues raised as part of a standard letter from a large number of respondents relating to a number of allocations in the Bury area but not specific to this allocation:

Bury Council have not communicated the GMSF proposals in a transparent way including how they originated either from residents or developers. Many people are unaware and therefore the general public have had to raise awareness. This is contrary to Bury Council guidelines in the Statement of Community Involvement.

The figure of 12,700 new houses in Bury does not accurately reflect the rate of population growth in the area and so this must be recalculated using reliable, up-to-date information.

Brownfield sites should be considered before Greenfield sites, and more should be done to identify and allocate brownfield sites and derelict buildings and properties.

Need for innovation in meeting housing requirements, such as building above supermarkets.

What guarantees are there that developers will build affordable housing and how can we ensure it is genuinely affordable for local people.

Objection to loss of Green Belt which has health, recreation and quality of life benefits, has local historic importance and cannot be replaced.

Adverse impact on road networks which are already at capacity and there is no feasible way of adequately mitigating this.

Significant air pollution from motorways in area, green spaces needed to offset this. Increase in traffic leads to an increase in pollution, adversely impacting on road safety, health and wellbeing and particularly mental wellbeing if no spaces to enjoy being outside in the fresh air.

Pressure on existing social infrastructure such as schools and doctors surgeries, more information is required on how this will be remedied.

Loss of wildlife and not possible to mitigate the impact of development if building on Green Belt land.

Loss of fields and trees which soak up rainwater, therefore increasing flood risk in an area badly affected by the Boxing Day 2015 floods.

Other non-site specific issues raised not as part of a standard letter:

Bury's housing provision is disproportionately large when compared with other local authorities and has been unfairly targeted;

Structural damage to property from increased traffic movements including heavy goods vehicles and the compensation that would be expected as a result.

It is an understatement that much more work will be required to explicitly address and fulfil the requirements of national policy on Green Belt.

The focus should be on remodelling existing developed areas such as redesigning the way high streets work using higher densities.

NG1c Whitefield

Who Responded

There were 284 submissions to this section. These were from 270 individuals, seven couples or other family groups, one unknown (name not supplied/illegible), no politicians, no landowners/developers, and one other organisation; the Environment Agency.

Summary of Issue(s) Raised

Support for the NG1C site as there is a lack of housing in the Whitefield area, particularly for 4 bed detached properties, and there is land available to meet the shortfall identified for the Bury district area. This allocation particularly well-served by existing infrastructure such as roads, motorways, supermarkets and schools and is therefore a preferable location to the large-scale infrastructure investment required to make the development viable at larger sites elsewhere in the Northern Gateway.

The proposals will result in the loss of over 90% of Green Belt land in the Whitefield and Unsworth township. This will result in considerable sprawl with no division between communities, destroying community identity and leading to a lack of belonging and loss of pride in the area.

A number of transport infrastructure issues have been raised:

Mode Hill Lane and Pole Lane are too narrow to accommodate an increase in traffic and will need to be expanded. Houses lining both sides, and a lack of parking facilities will cause significant problems to both local residents and commuters.

Fears that the large industrial estate proposal at NG1A will lead to access being gained through the NG1C site, adding to the pressure on Mode Hill Lane and Oak Lane which are already at capacity at rush hour.

The south of the Borough is very congested and cannot cope with further development. Motorway links will exacerbate the problem.

Public transport infrastructure in the area is already stretched. Whitefield is the 3rd stop on the line from Bury and trams are regularly full to capacity at rush hour.

Flooding has been experienced in Marston Close and Mode Hill Lane area to the south of the site. The relatively high water table immediately to the north of the M62 would be made even higher if allowed with the potential to cause flooding in the future as a direct consequence.

The site includes a natural habitat for Great Crested Newts and is a stop-over point for the annual migration of many thousands of birds including the Canadian Wild Geese. There is no evidence that the effect of the proposal on bats and other wildlife populations currently active in the Whitefield area have been considered. Species must be protected as part of the development.

Concerns over loss of amenity for local residents as a result of detrimental effects from air and noise pollution and increased noise levels and disruption that will be caused.

Objections to the loss of farmland of which precious little is left and was eroded firstly in the 1960s in this area with the development of the Hillock Estate. Farms and farmland should be protected to grow much needed local produce.

Broadband connections and street lighting will need to be improved as part of any development.

The site is on higher ground than existing properties on Mode Hill Lane leading to overlooking and impacting on privacy and environmental quality for current residents.

Pule Farm should not be built on as this would result in a loss of views of the countryside from surrounding properties.

The Environment Agency note that whilst the reference to the use of sustainable urban drainage systems in point 6 is supported, it is recommended that additional wording includes reference to soft or green sustainable urban drainage systems to help support policies GM18 on Flood Risk and GM25 on Allocations. Green SUDS have greater environmental benefits over hard engineered options such as underground tanks or pipes.

The Highways Agency are of the view that connections to the 'NG1a' allocation are currently poor, as are the existing links between the west and east of the M66. It will therefore be necessary to upgrade or provide new pedestrian, cycle or even vehicular bridges over the M66.

Lancashire Wildlife Trust suggest the policy should include requirements relating to the protection and enhancement of open water habitat and for green infrastructure to retain and enhance links between the open water areas. Further information and evidence is required on habitats and networks and the criteria for their designation in order to comment further.

City of Trees welcome the references to green infrastructure within the policy although view that these should be strengthened to refer to 'extensive' areas of GI as well as extensive areas of tree planting to help mitigate noise and air pollution.

United Utilities highlight that several large pressurised water mains and sewers cut through the site and that there are existing easements which will need to be considered. Consideration must be given to disposal of surface water in the most sustainable way.

Other issues raised as part of a standard letter from a large number of respondents relating to a number of allocations in the Bury area but not specific to this allocation:

Bury Council have not communicated the GMSF proposals in a transparent way including how they originated either from residents or developers. Many people are unaware and therefore the general public have had to raise awareness. This is contrary to Bury Council guidelines in the Statement of Community Involvement.

The figure of 12,700 new houses in Bury does not accurately reflect the rate of population growth in the area and so this must be recalculated using reliable, up-to-date information.

Brownfield sites should be considered before Greenfield sites, and more should be done to identify and allocate brownfield sites and derelict buildings and properties.

Need for innovation in meeting housing requirements, such as building above supermarkets.

What guarantees are there that developers will build affordable housing and how can we ensure it is genuinely affordable for local people.

Objection to loss of Green Belt which has health, recreation and quality of life benefits, has local historic importance and cannot be replaced.

Adverse impact on road networks which are already at capacity and there is no feasible way of adequately mitigating this.

Significant air pollution from motorways in area, green spaces needed to offset this. Increase in traffic leads to an increase in pollution, adversely impacting on road safety, health and wellbeing and particularly mental wellbeing if no spaces to enjoy being outside in the fresh air.

Pressure on existing social infrastructure such as schools and doctors surgeries, more information is required on how this will be remedied.

Loss of wildlife and not possible to mitigate the impact of development if building on Green Belt land.

Loss of fields and trees which soak up rainwater, therefore increasing flood risk in an area badly affected by the Boxing Day 2015 floods.

Further work is required by Bury Council/GMCA, also raised as part of a standard letter relating to more than one site, to:

Ensure reasonable steps are taken to communicate these plans to residents including highlighting on local authority websites that these sites are currently in the Green Belt.

Review housing requirements independently to reassure residents that an actual need is to be addressed.

Other non-site specific issues raised not as part of a standard letter:

What alternative land has been considered?

[NG2 Land East and West of A627M](#)

Who Responded

There were 2389 submissions to this section. These were from 2137 individuals, 119 couples or other family groups, 35 unknown (name not supplied/illegible), 1 politician (Cllr James Larkin), x landowners/developers (Advisian, FW Investments Ltd, John & Margaret Lees, Richard Turner & Son), and five other organisations:

- Environment Agency
- Historic England
- Peterloo Memorial Marches
- St Johns Primary School
- The Blue Cross

Summary of Issue(s) Raised

[Principal of Development](#)

- Concern regarding the GMSF proposal to use Greenbelt land to provide over 30% of the total quota for the new housing stock. The belief is that development cost considerations are being prioritised and we would ask that this not be the case
- Should use existing brownfield sites within Oldham, Rochdale and within the M60 ring road of which there are plenty (Many specific examples set out in the responses).
- Any future development proposals should explore full use of, and encourage regeneration and development on brownfield land. This could be achieved through developer incentives and remediation strategies.

- The size of the development is too large. It should be scaled back to around 20% and limited to A627 (M) corridor.
- A large chunk of building land is much more attractive to a commercial developer than derelict sites in need of regeneration or smaller brownfield sites.
- Opportunities exist either side of the tram track between Shaw and Oldham which would benefit from regeneration
- If the wish is to preserve some of the older buildings Mills etc. ensure they are made usable i.e. convert to offices or apartments but if derelict they should be demolished
- For the people not lucky enough to live in the green belt the fact that they can easily reach these areas has got to be an excellent reason for not destroying them. Children in local schools have learned about nature by having organised walks around the area
- It would appear to us that there has been a disproportionate emphasis on motorway access and ease of development which has resulted in an unreasonable proportion of the land allocation being placed within the Royton vicinity. We would suggest the emphasis be placed on land availability (Brownfield, redevelopment etc.) and suitability which in turn, may result in a fairer distribution across Greater Manchester.
- Allocations and green belt release can only be justified where sites are likely to be attractive to the market, generally accessible to the northern towns and where the green belt release can be achieved without undermining the strategic function of the remaining green belt. With this in mind, it is considered that land south of Heywood and adjoining Pilsworth is far preferable than the allocation of Land east and west of A627(M) (Oldham and Rochdale)
- Many respondents acknowledge the need for additional housing but consider that there are better alternatives to achieving this e.g. brownfield sites.

[Release of Green Belt](#)

- The five purposes of Green Belt Policy GM13 are completely ignored and considered irrelevant in relation to the change from Green Belt in the area.
- Not enough consideration has been given to the Green Belt Assessment which show how well this area performs in terms of Green Belt.
- The parcels of land covered by the allocation score quite highly within the Green Belt assessment. Less sensitive locations should be considered in terms of the release of Green Belt
- The lack of a clear, physical or permanent boundary to the amended green belt here would weaken the remaining Green Belt. The impact on the Green Belt in this location would undermine the ability of the remaining Green belt to fulfil the purposes of land included within the Green Belt
- The development would increase urban sprawl by merging Oldham and Rochdale
- The green belt gives countryside access to many, many people who live locally but also those who travel from the city to escape the chaos.
- The purpose of green belt land is to preserve the landscape and prevent sprawling urbanisation therefore this specific aspect of the proposal should be resisted at all costs
- The UK government therefore encourages local authorities to protect the land around the towns by creating green belts.

- The loss of green gaps between neighbouring towns which is very important for people's quality of life in densely built up areas
- 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 Green belt should not be sacrificed for a few low paid warehousing jobs and housing that could be built on brownfield sites elsewhere
- If an individual is not allowed to build on the Green Belt then why should the Council.
- The Green Belt is there to keep land green
- The proposal to use Green Belt land to provide over 30% of the total quota of these proposals should be revised and alternatives sought.
- If enhancement and protection of the blue and green infrastructure is a central theme of the strategy, and if we must develop green belt land, the strategy must consider developing green belt land of lower value in respect of wildlife, accessibility for local communities to access green countryside amenity spaces and ultimate impact on local communities.
- Developers with planning Permission for homes already in place should be forced to build those homes before any Greenbelt land is considered. Developers are holding back to keep housing demand and, more importantly for them, prices high
- The Green Belt earmarked throughout the GMSF is a valuable asset and if used properly would help in achieving an upturn in the local economies
- Provided the extension of Stakehill does not provide an oversupply of sites of a type which will compete with vacant or derelict urban employment sites (due to the limited size of development parcels), this area could be an acceptable option. Its removal from the Green Belt would allow a defensible green belt boundary (the A627M) to be retained and would result in a limited harm to the strategic role and openness of the Green Belt.
- The green belt area that you propose to develop is outstandingly beautiful. I suggest you all take a walk there sometime before you make a final decision about what you intend to do with this land.

Transport/Highways

- Infrastructure will not support the additional traffic with local roads already at capacity and development would have an adverse impact on road safety in the area.
- The M60 is already congested and the smart motorway will only marginally improve things. The M62 will not be able to support the new development
- The A627M is already badly congested, notably at the junction with the A664.
- Many other main routes in the area are already heavily congested.
- There is already an overload of traffic in the Slattocks area, without any more delivery lorries or personal vehicles being introduced to the area
- Concerns regarding highway safety within the local area.
- Main road through Royton is already congested and this will add to it.
- Creating another access from the roundabout on the A627(M) would require significant land remodelling and therefore have a negative impact on the SBI
- Creating the new roads to facilitate the development may lead to local 'rat running' through the area on to the motorway.

- Would require new access points to be created to serve the proposed large scale housing at Slattocks which would have a significant impact on residential areas in Slattocks and Castleton and on the Stakehill roundabout
- Already disturbance from HGV's in the area that can go on until around 1:00 am.
- Existing roads are narrow and often single track. The state of local roads is currently poor and cannot cope with current traffic and usage levels.
- There would be a need to cater for the transport needs of residents, industry and businesses but local 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 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
- The bus route through between Rochdale and Manchester is good. Less so for people travelling from the area to Oldham for example. But these bus routes and times, will be impacted by increased traffic. Further bus routes would need to be created to facilitate access to the new housing estates again increasing congestion.
- The closest stations to Slattocks are Castleton and Mills Hill. Both good stations but if using Castleton then that's a 20 -25 minute walk or a bus ride which means waiting for the bus to turn up. If using Mills Hill then that is a 25-30 minute walk. I know of no bus from the area that travels there.
- There is insufficient parking at local stations and this creates significant on-street issues.
- There is a good rail link to Manchester, from Castleton station, but this is located in the opposite direction to the main flow of workers' traffic, and is very under-used.
- Rail services are hopelessly overcrowded (often only 2 carriage trains even at peak times with people having to wait for subsequent trains because they cannot get on) and there are no plans for extra stopping services at Mills Hill and Castleton.
- The bus route cannot be used during the rush hour. Towards Manchester, the traffic queues up all the way back from Harpurhey and Blackley, through Alkrington, through Slattocks, and all the way to Castleton. That is a distance of over 6 miles. Bus lanes have only been incorporated on short stretches, where the roads allow, but the bus lanes are deemed pointless when they only stretch over several hundred metres of the total of six miles.
- The proposal refers to creating sustainable short journeys to work and promote healthier lifestyles yet also emphasises the location as part of the Northern Gateway and Northern Powerhouse with connections through to Liverpool and Leeds. These 2 claims completely contradict each other.
- Traffic in relation to the existing Stakehill Industrial Estate is already congested; in particular there are issues along Bentley Avenue.
- Parking in local town centres (e.g. Royton) is already an issue and this will just add to the problems

Housing

- Has the GMSF considered the improvement of council owned housing to maximise its occupancy rather than simply construction new housing developments? Only when the council owned property is at full occupancy should consideration be given to development on Greenfield sites
- There are plenty of unsold houses in N Chadderton already
- Surely it is the quality of the open space / countryside in this area keeps the house prices healthy and makes it an attractive place to live.
- Unfair if people can access Council housing in an area where people have spent a lot of money on a property
- Thought the requirement was for more affordable housing this doesn't usually happen in green belt areas
- The figures that the report shows with regards the increase of population and the housing required seem a little on the optimistic side. Middleton's population over the last two censuses has been shown as falling; it has dropped by 5,000 people. There are plenty of properties available on the market at all price ranges in particular an abundance of affordable properties
- The areas identified for housing could not sustain the numbers proposed
- It would appear from the figures that Royton is being expected to take an unreasonable share of the burden in meeting the Government's target for additional homes.
- I have also learned that over 3500 vacant residential properties are spread around the Borough; surely this must be taken into account before Greenbelt is destroyed.
- A number of responses do not feel that the same level of housing is now required due to Brexit and reduced immigration into the UK.
- The housing - is this really to accommodate 'our people' or to accommodate the huge numbers of immigrants we take in each year? I would like to point out that I FULLY support helping genuine refugees but this is different to immigrants that arrive and do not want to live in our culture.
- CPRE assessment suggests a lower housing target and therefore it is considered that too much housing is being planned for.

Economic development

- It appears that the potential supply of land for employment purposes in the Allocations across GM will far exceed that which will actually be required within the plan period and there is excessive level of housing within the allocation
- There is an excessive level of employment land within the Allocation
- Motorway sites attract warehouses and distribution units and there is a concern that the allocation would not in any event attract skilled employment opportunities which are needed in the Northern Gateway area.
- Given that many units on Kingsway are still empty why dig up more farmland, fields and wildlife habitats to build yet more units
- There are many empty industrial units vacant at Stakehill and Queensway. In addition you have the Pilsworth Retail park, which should be redeveloped and is currently full of empty failed retail units

- It makes no sense to extend Stakehill industrial estate when it appears large numbers of current properties are unoccupied
- Where are the jobs that will support the people destined to come and live in these houses
- If the issue is that the existing units are not the right type then these should be dismantled and rebuilt in the same location instead of developing new sites.
- How does building an industrial estate and filling it with empty units bring jobs? Cowm Top industrial estate which was built and the number of jobs that was quoted it would provide was 500 local jobs. It currently employs 28 people.
- Lack of suitable employment opportunities in the area means that often younger people are having to accept part time / lower paid work which is not commensurate with their qualifications.
- Naïve to think that this development will bring prosperity to the town in the area. Instead it is the towns themselves that need investing in

Physical infrastructure

- How can the proposals be considered strategic when there are so few details in terms of infrastructure
- What impact would it have on the gas, electricity and sewerage infrastructure in the area? 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 not uncommon
- Water systems date from the 19th century and are not capable of dealing with current loads.
- The area has suffered serious drainage problems in the past and there have been instances of flooding in a number of locations across the site and on key routes.
- The areas identified for housing could not sustain the numbers proposed. The land is very hilly and boggy, frequently flooding which then spills onto neighbouring homes and roads. Local geology and drainage issues means that flash flooding is common and would be exacerbated by the new development. 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
- Proposals would increase the risk of flooding in the Irk valley
- The water table in the area is high and this has prevented development in the past

Social Infrastructure

- The scale of the development will cause chaos for the local schools, doctors, dentists and all other community infrastructures. Currently difficult to access medical facilities in the area
- There are just not enough services to support the hundreds, if not thousands of additional people with vehicles, school requirements, nurseries, GP's surgeries etc. The councils struggle to manage the roads, bin collections, environmental issues etc. as it is with all its resources and budget cuts. How does it propose to manage the additional burden with its current resources?
- Existing schools are already at capacity and there is already significant traffic congestion at peak times

- Many residents do not have access to a dentist as they're already full and aren't taking on any new patients.
- The local hospitals are also hugely overstretched with Accident and Emergency departments in crisis. Since the closure of the Rochdale Infirmary A&E department this crisis has deepened
- Refuse disposal, black bin collections now every three weeks on account of funding cuts to councils. Can tips / recycling centres cope
- Would have an adverse impact on the existing St John's Thornham School.
- Police and fire services again are both in short supply for the area, unless addressed then people's lives and property will be at risk.
- The current situation with policing of Middleton and Castleton is to put it mildly a disgrace, there is a lack of officers especially overnight and at weekends.
- Leisure facilities and green areas also need to be provided before what is already in existence is taken away

Health, wellbeing, community and heritage

- The loss of the open space will be mean there is less opportunity for people to use this area for exercise and fresh air therefore having a detrimental impact on the health and well-being of local residents
- Loss of opportunity to exercise and get out in the fresh air which is proven to vastly improve people's health and well-being, including mental health
- These areas contain publicly accessible open space and well used rights of way and recreational routes which connect with Tandle Hill Country Park the surrounding countryside of Oldham and Rochdale.
- Would introduce significant air and noise pollution. Noise pollution from increased traffic would have a particular impact on the enjoyment of this area. Also a reduction in air quality due to the increase in vehicles
- There are high levels of deprivation in the area and health inequalities. Removing areas of green space will only make this worse
- With regards to protecting the canal system, intrigued to know how this will be protected and maintained, when the plans clearly show that the Stakehill Industrial Estate will again run alongside the Rochdale Canal in Middleton, covering existing farming fields.
- Detrimental effects on grade two listed buildings at Cinder Hill Farm and proximity to hamlets of Healds Green, Chadderton Fold and Racefield. The development of the allocation is likely to have a detrimental impact upon the setting of these historic assets.
- Who would aspire to live in an area devoid of greenery and open air recreational activities
- The development would have a detrimental impact on the setting on a number of historical assets
- The area includes ancient field patterns, old tracks and lanes, the 15th -century Cinder Hill Farm at Thornham Fold, many 17th, 18th and 19th -century cottages, a toll bar cottage, and Gerrard's Wood and stream celebrated in Bamford's poem 'My Wynder'. The area includes many links to local art, heritage and is an important surviving example of the landscape of the handloom weaving settlements

- In 1819 the people of Oldham, Rochdale, Middleton, Chadderton and surrounding areas gathered in this place in order to prepare themselves for what turned out to be one of the most historic days in the history of our country, the infamous Peterloo Massacre of 16th August 1819. As we approach the bicentenary of this event its importance is becoming increasingly well understood. This is due, in no small part, to the activities of the Peterloo Memorial Campaign, and the Peterloo Memorial Marches.
- The unadopted Thornham Old Road and Thornham Lane are known locally as the 'Old Coach Road'. At the Royton end on the 160 yard stretch of adopted Thornham Old Road leading onto the main A671 Oldham/Rochdale Road at Summit, Royton exists the 18th Century coach station and coach yard.
- Tandle Hills were created by ice age glacial activity forming very rare undulating hills characterising Tandle Hills. I am not aware of anywhere else in the country which possesses these combined characteristics.
- Thornham Lane is an old Roman road that used to extent to Yorkshire, hence the Toll Bar Cottage.
- The old stone pack horse trails that should be preserved not built over
- This is an area of particular historic value and public amenity. It should remain as green belt and instead be identified as a landscape of historic and heritage value and treated accordingly.

Green Infrastructure/Biodiversity

- Proposal would lead to the erosion of green space, including the loss of trees and hedgerows.
- Significant impact on the views from Tandle Hill and Chadderton Heights
- Although the policy makes reference to mitigating the visual impact of the development it would seem impossible to do this given the scale of the proposal.
- Building here would diminish the striking views across the valleys into surrounding countryside
- The development would effectively surround Tandle Hill Country Park.
- The development of land directly to the west and north of Tandle Hill will undermine the value of this landscape in helping to achieve stated green infrastructure priorities and is therefore contrary to policy GM7 of the GMSF.
- Developing areas in the vicinity of Thornham lane over towards Royton would have severe impacts on the country feel of the area and open countryside feel and visual aspects that can be viewed from the Tandle Hill monument and create the countryside feel of the park.
- 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 more unstable, risking landslip
- Over recent year bridle paths have reduced greatly forcing more & more riders onto roads. This area provides a safe environment for all of the above recreational activities (walkers, joggers, cyclists, horse riders), & plays a vital role in the community
- The open spaces are used by children for playing (walking and cycling) and education and are important in the promotion of physical activity.

- This will have a detrimental impact on the environment through loss of habitats for wildlife as well as diminish the beauty of areas such as Tandle Hill & Chadderton Heights Areas like this are in short supply & provide a vital outlet from the outlying urban areas
- Loss of wildlife that inhabit the area including deer, foxes, lapwing flocks, rabbits, geese, ducks, herons, kestrels, owls, hedgehogs, field mice, grey partridge
- Birds watchers explore the Greenbelt where 15 of the 64 species on the RSPB Red list inhabit the area
- I believe there are Great Crested Newts in the ponds around the Slattocks - Trows Lane greenbelt: a protected species. It is a fantastic area for bird watchers with pheasant, grouse, and seasonal visitors again this should be used as an asset to appeal to people to visit.
- Instead of removing open space Council's should be doing more to encourage people to visit it.
- The area of Tandle Hills should been enlarged to incorporate Gerrard Wood and it's adjacent land, as well as the land between the existing park boundary and Thornham Old Road as far as the right of way from Thornham Old Road, part of which is on the Oldham Way, to the existing park entrance at the northernmost tip of Tandle Hills.
- The policy makes reference to retaining and enhancing areas of biodiversity within the site. Given the nature and scale of the development it is unlikely that this could be achieved.
- The proposal to introduce substantial development directly adjoining the park would downgrade Tandle Hill from a country park to an urban park.
- Part of the land has Village Green status.
- The proposal would lead to the loss of large areas of agricultural land and the associated farms.

[Agriculture](#)

- As your plan currently stands, it literally cuts our working farm in half, swallowing up our houses and farm buildings. I have been on your map and marked off the additional areas we want including in the plan, and roughly it equates to 163,077sqm or 16.31hec. A new housing estate is about to be build right up to our farm yard on the old British Vita site, so it would make sense to take the lot instead of leaving the farmyard standing adjacent to an existing estate and the new one
- Should be thinking about growing our food locally but building on the Green Belt will not allow this to happen.
- The loss of Green Belt which is farmland will consequently mean loss of livelihoods and the valuable contribution that farming makes within the local community.

[General](#)

- These proposals, along with others in the GMSF, have not been well communicated
- There is little in the GMSF which demonstrates a commitment to the recycling of derelict and other urban land. Urban regeneration will not be achieved if green belt sites are allocated for employment uses that could be accommodated in urban brownfield sites.
- It is noted that the allocation is expected to comply with relevant Draft GMSF policies and requirements. However, it is considered that it would not be possible for development to comply with some of these, either through good design, management or mitigation.

- It is disputed that development in certain parts of the allocation could comply with all the criteria of Policy GM25.
- Accept that there needs to be progress and agree that we cannot stay still but not at any cost and feels the cost to the community, wildlife, support structure, policing, fire services, council services etc. will not cope - not least I strenuously object to the ugly blot on what is at the moment, a beautiful landscape
- They are in the established greenbelt 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
- Why ruin such a beautiful area when there are so little of them in Oldham
- My house currently looks out upon an open space / green fields. This was reflected in the value of the property. The development will subsequently reduce the value of my property.
- Loss of the beauty in which the Tandle Hill war memorial lies. Do we not owe it to those who gave their lives for us to leave their memorial location as beautiful as it is today?
- If it is built upon, it is no longer a green belt, it just becomes another urban jungle that's unattractive, unhealthy and a depressing place to live
- The first page of the GMSF includes a sentence explaining how the protection and enhancement of green infrastructure is a priority when the case of Chadderton it is just removing the last green spaces in the town.
- It is frustrating to think that the area chosen around Chadderton has been chosen simply because of the existing motorway network
- The key assumptions about growth in demand for housing and commercial buildings have been formed prior to the Brexit decision of the UK to leave the EU. As such, these demand assumptions are inherently flawed as the impact on future population growth is completely unknown. However, as one of the key principles of Brexit is a reduction in migration to the UK, this will obviously lead to a reduction in population growth and subsequent reduction in demand for housing. To be meaningful and accurate, the assumptions about demand within the framework must be re-validated in light of this.
- General issue about how the proposals were publicised and how people could engage with and comment on the proposals. Particularly problematic if no access to email or twitter.
- Proposals reflect pressure exerted by the private sector to bring these proposals forward
- The town centre isn't thriving as it should. Manchester city centre has made provision for key workers and jobs. Oldham and Rochdale should do the same.
- Previous plans for this area have been badly managed, industrial estate etc., project management skills to manage this project do not exist at council level. Planners are not good enough, track record is very poor, and any positive comments have never lived up in the past. They would fail to manage this project. It needs to be smaller and straight forward using alternative options.
- If green areas have to be developed this should be done by developing new towns with new infrastructure well away from existing conurbations to prevent further urban sprawl and to avoid damaging the precious undeveloped areas which are currently accessible to the residents in existing conurbations like this
- Chadderton Fold and Healds Green should remain as historical hamlets of the borough, not simply lost through greed

Support

- Support for the scheme submitted on behalf of five land owners. They are in favour of their land being taken out of the Green Belt for residential or commercial development.
- Support offered by a further landowner adjacent to Stakehill Industrial Estate.

Comments from organisations

Environment Agency

- There is no reference to the use of sustainable urban drainage systems within this strategic allocation
- To comply with GMSF policies GM18 (Flood Risk) GM25 (Allocations) we would recommend that additional wording includes reference to 'soft' or 'green' SUDS. Green SUDS have greater environmental benefits over hard engineered options (e.g. underground tanks/pipes).
- Suggested wording put forward for inclusion within the policy
- Records show that there are several historic landfill sites within the allocation boundary. Therefore in line with other allocation policies and to comply with NPPF some wording is suggested for inclusion within the policy.

Rochdale Field Naturalists

- Welcome the GMSF's attempt to take a long term, strategic and comprehensive view of the future of the Greater Manchester city region and the need to balance development with the preservation of natural habitat, wildlife and open spaces
- Support addition of land to the Green Belt
- Have major concerns regarding allocations within the Green belt, including NG2
- Have major concerns that the Framework does not give adequate attention to the value of open land and the Green Belt, particularly in the southern and southwestern margins of the Rochdale Borough where relatively large stretches of Green Belt are allocated for development
- Large reduction in the open land between settlements
- Would create urban sprawl with no green relief
- Open land and Green Belt can be of great value to wildlife, containing as it does a mosaic of habitats and numerous Sites of Biological Importance, SSSIs and Local Nature Reserves. It can also provide important wildlife corridors along which species can move and prosper, which could all be threatened if the development allocations are implemented.
- Such open space has significant value for the health and well-being of local people
- Concerned that the proposed development allocations in the GMSF may not comply with the statutory duty under Section 40 of the Natural Environment and Rural Communities Act 2006 to protect, conserve and restore biodiversity.
- Rochdale Council's Core Strategy of 2013 refers to the continued protection of the current Green Belt throughout the plan period
- Concerned that releasing this amount of Green Belt land in Rochdale Borough and surrounding areas could critically undermine policies within the Rochdale Core Strategy and the purposes of the Greater Manchester Green Belt policy. This includes the purpose to

redirect development pressure and needs to existing urban areas, particularly brownfield sites, as part of an overall policy emphasis on urban regeneration and concentration

- Developers generally much prefer developing cheaper Greenfield land than potentially more difficult urban brownfield sites, yet experience since the GM Green Belt was established demonstrates that steering development pressure to existing urban areas is perfectly feasible
- Allowing any development in the Green Belt to meet long term strategic requirements needs to be very carefully and critically considered to ensure it does not reduce incentives and policy pressure to make the best use of brownfield and other sites within the current urban area.

These concerns can all be regarded as objections to the following development allocations in and around Rochdale Borough: - NG1a (north of M62); - NG1b (south of M62); - NG2 (east and west of A627M); - NG3 (M62 Jct 21); - OA13 (Bamford/Norden); - OA14 (Smallbridge/Littleborough); - OA15 (Castleton); - OA16 (northeast of Smithy Bridge); - OA17 (east of Heywood).

Comments from Councillors

- Oldham and Rochdale is already struggling to meet the demands of the population. Schools are oversubscribed along with doctor's surgeries. Castleton has already had a large number of new houses being built and more have planning approval. Before any could be considered the infrastructure must be in place. The overall plan I feel is over ambitious and very frightening to local residents who see a major change in their locality
- Do not feel that this area is suitable for such a large building project.

NG3 Junction 21 of M62

Who Responded

There were 2041 submissions to this section. These were from 1875 individuals, 60 couples or other family groups, seven unknown (name not supplied/illegible).

Four political:

- Councillor Andy Kell
- Oldham Council Liberal Democrat Group
- Shaw and Crompton Parish Council
- Simon Danczuk MP

Four developers/landowners:

- Mr Graham Prenty
- Brock Ltd
- 'Landowners in NG3' (via Black Cat Building Consultancy Ltd)
- Taylor Wimpey Ltd

Nine other organisations:

- Chadderton Historical Society
- Environment Agency
- Esther Marie Photography
- Friends of Dunwood Park
- Historic England
- Newhey Manor Care Home

- The Campaign to Protect Rural England, Friends of the Peak District & The NW Transport Roundtable (single submission)

Summary of Issue(s) Raised

The Northern Gateway in itself is disproportionately large in relation to the other gateways.

Milnrow, Crompton and Newhey cannot cope with any further development. The area around Shaw and High Crompton has seen significant development over the last few years, including sizeable mill development at Yodel/Littlewoodes etc.

Far from benefiting local residents, the proposals have resulted in a massive amount of ill feeling and resentment throughout the local community, caused mainly by the threat of losing such a massive amount of greenbelt.

Question evidence around 'land supply gap'. With no convincing evidence to suggest that there is a gap it is considered totally unnecessary to allow development of greenbelt while, for example, newly developed industrial units lie vacant:

- Overwhelming evidence to the contrary suggesting that there is already more newly developed industrial floorspace than can be filled. There are billboards alongside the M62 adjacent to J21 advertising the availability of industrial floorspace available to let. There are also billboards in Kingsway Business Park advertising a range of plots to buy or let. Strongly object to further development being encouraged based on the perceived 'success' of the Kingsway development. Fail to see how there could be demand for further development to the south of J21 or how this will complement the undersubscribed existing Kingsway Business Park. The Kingsway Business Park has now been open for over 5 years and there is only approximately 20% occupied. With this type of uptake it would take another 20 to 25 years just to fill what is already there.
- Kingsway Business Park has failed to make Rochdale prosper as promised, it may have attracted a couple of big businesses but judging by recent news reports the only jobs it has created are at minimum wage and with poor conditions. As you approach Milnrow on the M62 the ugly grey buildings of The Kingsway Business Park is one of the first sites you see and in honesty can be seen for miles around.
- There are currently 104 old mills and a range of brownfield sites large enough to build around 7,224 houses, which are not included in the proposals.
- Furthermore, if housing need calculation is based on businesses letting or buying the units on Kingsway Business Park the need for additional housing is questioned. If the business units are surplus to requirement it would not be necessary to build houses to house the local labour supply.
- Unclear as to which companies are interested in the employment land.
- There is lots of vacant large scale employment space at Kingsway Business Park which can accommodate large employment demands. There should be then, provision for small scale employment uses within the proposals.
- The development at Kingsway has already had a significant negative impact on the landscape, further development here would further add to this poor image.

- This site is in multiple ownership and was not put forward in any of the Call for Sites exercises and so there is no certainty that the 1,500 dwellings allocated against this site can be delivered.

More pressure should be put on Oldham Council and neighbouring authorities to utilise and redevelop brownfield sites, implement existing planning permissions, redevelop derelict and neglected sites, including vacant mills and factories in our town centres and to bring empty properties back into use.

In conflict with section 2.5 of the Draft Plan which states that 'there will be a very strong emphasis on directing new development towards locations that support urban regeneration, minimise environmental impacts and reduce the need to travel'. In contrast NG3 will not support urban regeneration and the environmental impacts will be immense, It also actively promotes the need to travel, stating that the 'the development of the site will need to provide a broad mix of high quality housing to diversify the type of accommodation within the area, and to support the new jobs created along the M62 corridor, creating a sustainable and high quality extension to the urban area'.

Release of Green Belt:

- Strongly object to development in Green Belt. The land is precious to our community. We need to think of this section of countryside as a precious resource for generations to come.
- There are no 'very special circumstances' to allow building on green belt and certainly not on anywhere near the scale of these proposals.
- The NG3 are has strong ratings for all the purposes of the Green Belt. Green Belt parcel OH03 is assessed as strongly meeting each of the purposes in the Green Belt assessment but is included in allocation NG3.
- The destruction of the Green Belt is state sponsored vandalism; once one part is released more will be open to destruction.
- Area unfairly targeted with an extremely high amount of Greenbelt proposed for reallocation when compared to other areas. Total amount of greenbelt in Shaw and Crompton is approximately 770ha. Proposals result in the loss of around 222ha or 29 of the total area of greenbelt in the two wards.
- Analysing each areas allocation within their borough, apart from Oldham they all appear to be far more evenly spread as would be logical to distribute the burden and ensure all areas contribute and benefit from such proposals.
- The Draft Plan appears to have evenly distributed the housing requirements across GM (with Oldham having 6% of the total GM requirement). With that in mind, the same should happen in Oldham, however, High Crompton and Royton, which only constitute a small percentage of the borough, are expected to take almost 100% of the greenbelt release. If Oldham is taking 6% of the GMSF's proposals then in effect, High Crompton and Royton are taking 6% of the whole of GM's greenbelt grab. Such disproportionate release of Greenbelt land could prove to be devastating to the areas concerned.
- The maps also clearly highlight that Oldham Council has ignored almost all developer calls for alternative sites across the borough. The main NG3 site has no proposals on it and all the NG2 proposals are from the Rochdale side. Instead it would appear that Oldham Council have targeted the wards of Royton and Shaw and Crompton whom are expected to provide

all the sites whilst Delph, Uppermill, Diggle, Bleak Hey Nook, Denshaw, Sholver, Failsworth, Bardsley, Chadderton and Oldham itself provide almost no land towards this Greater Manchester wide proposal. How can it be that an area that forms less than 20% of the Oldham Borough can be expected to take 100% of the greenbelt loss, destruction of the wildlife and recreational areas not to mention the increase on infrastructure and other detrimental effects?

- These sites (according to the GMSF document and the Oldham Council Leader herself) were chosen because they are available, suitable, viable and deliverable. However, as the maps show, the NG2 and NG3 allocations were not proposed by land owners so surely that disqualifies the available part as not all land owners were contacted prior to this current consultation (farm owners have confirmed this). Secondly, how can they be deemed as suitable or viable when they are all in the same small area and local infrastructure cannot be upgraded to cope with such an increase?
- In light of the existing land supply available argue that there are not the ‘exceptional circumstances’ required to justify greenbelt release. Only when ALL the sites across GM have been utilised should it be considered that ‘exceptional circumstances’ exist.
- The release of greenbelt should be carefully considered and the requirement should be proven beyond all doubt prior to the minimum amount of greenbelt land released.
- Many residents around NG3 choose to live in this area due to its close proximity to the greenbelt and the protection that greenbelt policy affords.
- Oldham’s Brownfield Register (taken from the GMCA website) lists 54.11ha of available brownfield land in Oldham. However, when compared with neighbouring districts this is a very poor response and is very worrying when we are faced with losing Greenfield sites. For example, Rochdale has 87ha, Bolton has 118ha and Bury has 92ha. How can it be acceptable that for a proposal as far reaching as this a local borough has provided such low number of brownfield sites when compared with other boroughs? The GMSF, and national guidance, states that greenbelt land should only be taken when other alternatives have been exhausted and in exceptional circumstances. There is concern that Oldham Council have not done enough to identify brownfield sites that they need to urgently review the process.
- Within Oldham there are only 10 of the 96 available mills listed on the Brownfield Register. Each authority, especially Oldham, need to re-evaluate this and add many more sites, including the mills, as an urgent priority. Releasing all 96 non-listed mills would provide well over 150 to 200 hectares which is way in excess of the paltry 54ha the council currently has registered. Local studies should be carried out on each and every mill in Oldham as this is a unique town when compared with the other boroughs due to its industrial past and the sheer numbers in existence.
- These area cannot be replaced or replicated elsewhere, they give us access to wildlife, farm animals, green space and fresh air, all within walking distance of our home.
- The greenbelt provides an important ‘lung’ for residents in the urbanised areas of GM.
- It is a finite asset and represents the only jewel in the Borough’s crown yet it is the first thing to be surrendered.
- Loss of the natural break from the other nearby communities, creating an ugly urban sprawl. The greenbelt was initiated to stop urban sprawl and prevent neighbouring towns merging into one another. If the proposal goes ahead that is exactly what will happen to Newhey,

which will be destroyed as a village as it will become a suburban town joined by urban sprawl with Shaw and Royton. Sprawl development impacts towns in many ways ranging from transportation to community development. When a town develops beyond its limits and onto the undeveloped land beyond it, it carries with it unforeseen consequences. Undermining the purpose of the Green Belt.

- Targeting Green Belt for redevelopment is an easy and cheap solution but the only winners are the developers who line their pockets.

Alternatives:

- There are other sites throughout the borough that could share the burden. The Call for Sites documents show that there are several sites that have not been considered yet, such as Littlemoss park and land south of Cop Road, which are both a mixture of brownfield and Greenfield land. Unlike High Crompton they have much better infrastructure in place or the ability to improve it. They both have more suitable land for development as parts are already developed whereas the area in High Crompton include flood plains, hills, restricted access and infrastructure, and several protected feature that will make development very difficult if not impossible. Furthermore, the sites are in different parts of the borough to offer a more even distribution of not only the land but also the infrastructure and environmental pressures that come as part of the development:
- Littlemoss Park – site has been dismissed by Oldham Council as they deem it part of the Littlemoss, Tameside EG1 site. However, as can be seen from the above maps and looking on the GMSF map there is still 20-30 hectares that has been proposed and included as a call for sites that is not part of the EG1 site. This would be an excellent site as this could link with the EG1 development and utilise the excellent transport links of Failsworth and the nearby M60.
- There is a collection of call for sites in Wood Houses (Failsworth) which is in another part of Oldham which could provide a collective site totalling 50-60 hectares and is close to the motorway links with much better infrastructure than High Crompton could provide.
- There are many others across the borough that could be used to spread this burden but Oldham Council seem to have taken the easy route and just chosen the largest sites even where the site has not been proposed by the land owners.
- The sites mentioned above are just two of the sites available across the borough and should be evaluated along with many other to offer a fair, evenly distributed allocation of greenbelt land across the borough.
- Whilst it may be difficult, officers should not shy away from the task for evaluating and bringing forward brownfield sites for development rather than releasing Greenfield land.
- Use of these brownfield sites and land with existing planning permission in the borough would satisfy at least the next five-years housing demand. There are also many large industrial buildings, amounting to millions of square feet, lying empty at the nearby Stakehill Industrial park, Kingsway, Heywood, Bury and at many other Oldham industrial parks so there is clearly no demand for more commercial buildings.
- LA's are obliged by current legislation to produce a Brownfield Policy Register - where is it?

- Oldham suffers from high levels of deprivation and so derelict areas should be redeveloped first.

Quality of jobs:

- What studies have been carried out to understand what will happen as technology increasingly takes jobs? In an age where technological advances are making fully automated distribution centres and warehouses financially more and more viable, a decrease in employment opportunities is inevitable with no positive impact on the area other than revenue for the council's. Fully automated distribution centres offer minimal employment opportunities and would have no positive impact on the area other than revenue for the local councils. Oldham Council have said that they will attract all types of industry to the town, not just distribution, but where are the actual plans on how they will do so?
- This document seems to point to the building of more warehouses. Quality jobs such as business parks are required in the area to increase the average wage in the area and to retain our young people.
- Local employment - can you please outline what area you are classing as local to the junction 21 plan? How many people are unemployed in this local area? What kind of jobs are you creating for these unemployed people and does this meet the skills of the locally unemployed? Are all these currently unemployed people homeless?

Housing:

- There is no mention of affordable housing.
- Proposals are on the basis of providing 'affordable housing'. What guarantees do we have that developers will build to this remit, rather than building luxury 4/5 bedroom homes in order to maximise profits?
- There needs to be modern thriving apartment blocks near to our town centres not in rural areas, most young people want to live in these modern buildings right at the heart of a town. These apartments will bring people to these shops, bars, cafes etc.
- The report says there is a requirement for extra housing but where have these figures come from? There are plenty of houses for sale in both of these towns that are up for sale for weeks. If there was a shortage of housing this would not be the case.
- The need for Social housing\ affordable housing is sometimes rolled out but this is not what will be built.
- Housing type and developer restrictions, there is very little in the actual plan within the consultation which defines the housing actually required, this would give an open canvas to developers who will look to utilise the most lucrative areas and pack housing in which may not be sympathetic to current surroundings.
- The plan makes no mention that development should be carried out with regard to the needs of the elderly. An aging population is likely to be a significant factor in the lifetime of the plan.
- I would ask that each Authority investigates the amount of properties owned by private landlords that are lying empty, as this could run into hundreds of homes that could be utilised without the need to build so many new. I would like to see the Greater Manchester Combined Authority work with companies to establish how much land is being banked and

sat on in Greater Manchester and how releasing this land for development would lead to a reduction in housing targets.

- The development plans would produce overcrowding in the area which simply isn't capable of sustaining further construction and urbanisation.
- If Littlewoods, JD Williams and Yodel were to move out of Shaw centre, there would be room for housing close to amenities and would see an end to the large waggons navigating Shaw's narrow roads at all hours of the day and night.
- There is talk of affordable housing being desperately needed but again there are an incredible number of derelict or demolished properties standing empty which could be utilised by the local authority to either renovate or re-build to ease the problem. Affordable housing should not be built at the expense of the people who already own their homes i.e. devaluing the homes already standing.
- The idea that executive housing will bring in professionals who will spend their earnings locally is so way off the mark it isn't funny. These people will still go into the cities as they have more disposable income and it isn't an issue for them to get to and from the Trafford Centre, Manchester, Leeds or Cheshire Oaks to buy their designer clothing or opulent indulgencies.
- New housing should have space for parking and sufficient garden space.
- New homes should be affordable for local people.

Infrastructure provision:

- Details need to be published outlining what action will be taken to reduce extra pressure on social services such as doctors and schools.
- There will be not enough schools in Oldham if the houses proposed are built.
- An increase in retail provision would not increase the quality of retail – Shaw is already full of takeaways and charity shops.
- How would the planning process ensure infrastructure delivery is properly secured, funded and resourced?
- If the house builders/developers want access to build homes, then they should be made to wait until the new infrastructure is in place or that they contribute to the infrastructure costs and also that guarantees are made with regards to this infrastructure.
- There seems to be little communication or joined up thinking between Rochdale and Oldham regarding infrastructure, school places, GP surgeries etc. This means that needs of ALL affected communities will not be addressed resulting in unnecessary pressure on service.
- The water supply, drainage and sewer systems date from the 19th century and are at full capacity.

Transport / highways:

- Proposals will create road congestion on narrow roads which will cause air and noise pollution and public transport issues.
- Would involve the destruction of public footpaths and bridleways.
- There is no existing road access to the site from Junction 21 and no details in the plan how this would be provided.

- Parking in Newhey is already an issue development at this scale would only compound the issue.
- Public transport is limited to infrequent and unreliable bus services despite a sizable existing population. Stops would also need to be increased to encourage more usage, particularly with additional populations moving into the area.
- The two main roads of Newhey are already struggling. Newhey has been badly affected by Oldham Council's willingness to foster distribution warehouses in Shaw, leading to constant heavy lorry traffic through the village. Any development of NG3 should avoid road linkages to Newhey.
- The increase in local population will adversely impact already struggling transport networks. Roads are already busy particularly during peak times. A minor accident or temporary traffic lights often result in roads being completely gridlocked. An increase in traffic will only worsen this. Do not believe that developers can adequately mitigate the impact on traffic. There simply isn't the room to widen roads in order to accommodate more traffic as all the major roads are lined with houses.
- Point 2 and 7 of NG3 contradict each other – point 2 suggests that the development will need to provide housing for people to commute along the M62 corridor whilst point 7 suggests that the development will need to encourage sustainable short journeys to work.
- With reference to point 8 of NG3 do not agree that using a junction that is already heavily congested during peak times will minimise the impact of associated traffic on surrounding residential areas.
- Specific infrastructure issues in relation to Rochdale Road which is the main, and only, road from NG3 to High Crompton. There is no provision within the policy to expand this road to deal with the extra traffic generated by the proposals. Even if there was money available there is no capacity to improve or alter the road as it there are houses on both sides of the road.
- The Metrolink service in Newhey has no car parking spaces allocated to it causing parking problems in Newhey. Additional housing and industrial units can only increase these problems. Trams from Newhey to Manchester are already very crowded and there is no mention of providing extra capacity.
- Potholes are already an issue and do not get repaired.
- Rochdale Council has a policy to reduce the number of children travelling to school by car but it is impossible for families in certain parts of Newhey to access local schools without walking along the A663. How can the safety of children be guaranteed with the proposed increased traffic.
- In our immediate vicinity side streets (such as Bentgate Street, Sycamore Avenue, and Cedar Lane during School pick up/drop off times) become gridlocked due to on street parking and traffic.

Green Infrastructure:

- There are insufficient recreational areas within Chadderton for the existing population.
- The green corridor that runs from Jep Wood and Dunwood Park across to the M62 is productive farmland.

- The land provides a rich habitat for numerous animals including brown hares, badgers, voles and stoats. There are scores of birds, woodpeckers, fieldfares, sparrowhawks etc. Many of these could be put at risk if this habitat is destroyed.
- The greenbelt that forms a buffer zone between Rochdale and Oldham is criss-crossed by footpaths.
- People are becoming more and more aware of how important green spaces are to the health and well-being of people who live and work within the borough.
- It is very important that our greenspaces are preserved, not only for ourselves but for future generations.
- The loss of valuable, heavily used recreational spaces for the local populace of all the age groups to enjoy. There will also be disruption of local footpaths and bridleways. Open countryside is superior to landscaped replacements such as footpaths and cycle paths. Existing footpaths passing through the site should be retained.
- The proposed site is a Special Landscape Area as defined in the UDP and this development would be unduly obtrusive development that would conflict this policy. Within this policy the area has been identified as having the highest landscape quality which merits recognition and special attention.
- Dunwood Park does not have the capacity to absorb the numbers of new residents being proposed. There is limited recreational open space in the area. Consideration should be given to extending Dunwood park and linking up by means of "green corridors" etc. to other parks/ open areas such as Tandle Hills and Crompton Moor.
- This area also has a site on it designated as a SBI.
- We should be thinking of planting more trees to help provide a cleaner and healthier atmosphere, not creating more pollution which will only get worse due to the added congestion on the roads.
- Horse riding is popular in the area with many stables located on this piece of land. Geocaching is also popular; many caches are hidden and searched for in the area. Once the land is destroyed these can never be replaced.
- I hope you have also thought about the 100s of horse owners that use these fields for their horses to graze and they will have nowhere to go if they have to move because all the owners are local to the area and keep them on livery yards. We have a very popular Riding Club that some of us use (Rochdale & District Riding Club) and I can only image that the numbers will drop and the riding club will also. This would be such a real shame as it has been going strong for 55 years.
- New development should include green roofs, blend in with its environment, contain bird boxes, and be surrounded by ponds, grassland, trees.
- Stanley Brook should be left alone to its wildness, Dig Gate Farm should be left as an area of traditional farming landscape, and there should be a large stretch of landscape joining the areas of Stanney Brook to Sudden Brook.
- Development would harm the character of the local area and harm local landscape.
- There is no mention of ponds and open water habitat within the text despite the inclusion of such features within the proposed allocation. Suggest the following additional Requirements: 'Development must ensure protection and enhancement of open water

habitat.' and 'Green infrastructure must retain and enhance links between the open water areas.'

- Point 3 should specify that landscape and green infrastructure should be of high quality. Point 10 should note that this should include extensive areas of tree planting.

Environment:

- Concerns over the loss of wildlife in the nearby woodland and the farming industry.
- In conflict with the vision that builds on the GMSF in relation to reducing carbon emissions and addressing air quality – 'combating climate change will be as important as delivering high levels of new development (section 2.1, Draft Plan). Proposed development will actively contribute to an increase in carbon emissions and reduction in air quality. Increase in vehicles, use of public of transport and utility usage (i.e. electricity generation) in combination with the reduction in open countryside would adversely affect the carbon cycle. The nature of the proposed strategic allocations(s) means that this would be concentrated in one area rather than being dispersed over several smaller areas as would be the case if brownfield sites were used.
- Section 1.17 states that the GMSF will '*protect the important environmental assets across the conurbation*' however release of extensive areas of greenbelt goes against this.
- With reference to point 3 of NG3, the existing development of Kingsway Business Park in no way minimises the visual impact on the wider landscape and extending the development will only exacerbate this.
- Proposals would result in the destruction of wildlife habitats and loss of areas of natural beauty and low carbon reducing green infrastructure.
- The council has a duty to protect woodland and wildlife under the UK BIO Diversity Action Plan. The area also has a Site of Biological Importance on it.
- The vast extent of NG3 would almost certainly cause Stanney Brook to dry out. The brook, which is important in respect of the flora of the area, and which contributes greatly to the parkland environment of Stanney Brook Park, Jubilee Park, and the parkland to the south of its confluence with the River Roch at Hamer, is already fragile. Any large scale development in the brook's catchment area would be disastrous.
- There is 100 year old woodland on the site which would be destroyed.
- There are large tree plantations on the side of Whitfield, losing these to the proposed development would be detrimental to the ecology of the area, affecting wildlife, birds and animal habitats and plant life.
- There is a need for an ambitious plan within Greater Manchester to protect our existing green spaces and woodland for recreational use and for the support of nature in an ecological rich environment.
- An ecological review should be commissioned to assess the impact on wildlife and produce a practical, effective and producible mitigation plan which will be transparent about the losses which will be suffered.
- This area is home to numerous species which I have observed & their habitat would be totally destroyed no matter how you try to dress it up as being done in an environmentally friendly way Birdlife minimum 40 species observed. Mammals - home to foxes, badgers,

deer, hedgehogs, squirrels, field mice, voles, bats Reptiles & amphibians - home to grass snakes, adders, frogs, toads, common newt, rare great crested newt.

Pollution:

- The massive housing development proposed for this area is at a higher elevation to the motorway and, due to the topography, will be subjected to high levels of noise pollution, which can't be prevented by sound barriers at the M62 source.
- Increase in the traffic volume will add to the high level of toxic fumes from exhaust gasses polluting the atmosphere.
- Currently this is a major concern of NICE - the outdoor air quality on our health.
- The GMSF plan will not alleviate atmospheric pollution, but it will add to the problem.
- Air quality due to the proximity of the motorway is controlled due to the Green Belt and open land. To build on this land is taking away Newheys oxygen mask.
- The GM15 on carbon emissions says that Greater Manchester will reduce CO2 emissions by 60%. How can this happen when so much growth is planned in Green belt locations?
- Carbon footprint would increase. Green Belt is known to consume and actually reduce these, with loss of Green Belt the air quality for the current residents will be reduced, and the carbon target everyone is striving to hit will be made even tougher, I see no reference within the GMSF re offsetting this carbon increase.
- The risk from methane gas escape by disturbing a land fill site at Whitfield Farm. This landfill site requires investigation to determine what types of waste has been deposited there and what dangers this may pose to residents of properties that are intended to be built in close proximity of the landfill site.
- Rather than reducing carbon emissions and addressing air quality, this development would actively contribute to an increase in Carbon emissions and have a detrimental effect on air quality. The massive amount of additional vehicles, increased use of public transport and an increase in users of utilities that would be synonymous with such a development in combination with the loss of thousands of square feet of open countryside would adversely affect the carbon cycle. Carbon emissions would increase and air quality would decrease as a direct result of the development. This would be due to several factors: Increased volumes of traffic. Loss of open countryside which would naturally combat Carbon in the atmosphere through the Carbon cycle.
- Additional utility usage, additional electricity would need to be generated to treat the increased volumes of potable water supplying the development and the subsequent increased volumes of waste water leaving the development. Additional Electricity would need to be generated to supply the power to the development including 'Green' public transport such as Trams. Unless this additional electricity would be generated using renewable energy sources this would result in a massive increase in Carbon emissions. In addition to this, the increased carbon emissions and decreased air quality would be concentrated in one area rather than being dispersed over several smaller areas as would be the case if brownfield sites were fully utilised as opposed one large section of Green Belt.

Flooding:

- The topography is hilly and boggy and the loss of trees and lack of drainage on the hillside will cause the River Beal at the bottom to flood all the properties around it. Building on these fields can only increase flooding risk to the houses at the foot of the hills.
- With reference to section 1.19 of the Draft Plan areas surrounding NG3 are susceptible to flooding. The most recent instance of this was November 21st (2016?) when large areas were flooded, including Rushcroft School which has flooded twice in recent years. Building in these areas where flooding is already a very real problem is likely to increase the severity of flooding in the future.
- The Boxing Day floods of 2015 were devastating for some local residents. We cannot fully understand the impact building will have on flood risk but surely if there are no fields left to soak up rainwater it will only increase the risk. Felling trees will also have detrimental impact on future flooding.
- Which way would the drainage system go to link up to a main drain? The fields are full of natural springs which cause flooding when it rains heavily.
- The sheer topography of the land in the Green Belt will mean that thousands will have to be spent on flood plains and infrastructure before the land is suitable for housing development when there are far more suitable brownfield sites.
- Drainage is poor and the land is not suitable for SUDS.
- The drainage system serving existing properties in High Crompton has been surveyed by United Utilities. The UUÂ survey proved that the existing drainage systems in High Crompton are already hydraulically inadequate and cannot handle existing homes, factory units and schools in the area. These drainage systems discharges top water and sewerage onto existing properties during heavy rain and cannot possibly take any more sewerage or top water from any new properties/factory units and the like connected, either directly, or indirectly, into these two drainage systems without increasing an already recognised flooding problems to existing properties in High Crompton without a significant and extremely costly upgrade to the whole of the two drainage systems.
- If the NG3 development goes ahead and extends right up to the boundary of Whitfield Farm and Lower Fields Rise then Flood prevention measures should be installed prior to any construction work on the Whitfield Farm land to prevent any risk of Lower Fields Rise flooding, either during the construction works or any time after the development has been completed, as a result of run off from the development.
- The area running along the edge of the river (Rochdale/Oldham boundary line in the vicinity to Ellen Road farm/Whitebeam close) we believe to be a flood plain to protect the immediate vicinity and the centre of Milnrow. We have lived in this area for 21 years and during the last 5 years it has been notable how these flood plains regularly take a lot of water during heavy rainfall. Each year that passes the river Beal gets ever closer to breaching its banks and but for these flood plains we would have real concerns. Our fear is should the land currently owned by Ellen Road farm be developed, not only will these new properties be at risk of flooding but their presence may exacerbate the potential for flooding and put the immediate area and Milnrow at greater risk.
- There is a known and reported issue with a United Utilities Sewer Overflow adjacent to the river Beal at Newhey.

- In Milnrow we have experienced unprecedeted flooding in the past couple of years due to the rivers which flow beneath the village centre. This has caused severe disruption to infrastructure, transport, homes and businesses. The pinch points are around Kiln Lane and outside the Milnrow Precinct. Despite this being discussed at the Pennine Township meeting a couple of weeks ago the Chair was only interested in batting it back to residents saying it wasn't the Council who are responsible. Please tell us who is and what you are going to do about it as our local elected members to hold the powers that be to account. Local businesses are losing money hand over fist whilst some locally elected members sit and do nothing, whilst others are proactive and are out and about on the street in wellies!
- The land in question is glacial moraine made up of sand with pockets of clay and therefore unstable with many springs, minor watercourses and shifting.
- Consideration must be given to disposal of surface water in the most sustainable way.

Health and education:

- The issues of Health and Wellbeing are now a national concern especially the obesity crisis, cardiovascular disease and mental health. We need to protect the open aspect of this area of countryside which offers access to nature for all people, young and old. It contains many rural footpaths, bridleways tracks and public rights of way. The GMSF Northern Gateway proposal removes this vital recreational resource from the people of Oldham and Rochdale and will have a serious impact on people's health and enjoyment.
- There is currently a focus and considerable funding for the promotion of health, well-being and heritage in our Borough how can this be reconciled with industrialisation of our Green Belt?
- Recent research has stated that living near heavy traffic increases the risk of dementia. A study tracking 6.6 million people estimates one in 10 cases of Alzheimer's among those living by busy roads could be linked to air and noise pollution.
- In conflict with section 2.1 of the Draft Plan which states that '*achieving improvements in health.....will be as important as delivering high levels of development*'. Healthy lifestyles would be impeded even further by the loss of large recreational areas used for cycling, horse-riding, walking, running and other outdoor activities.
- Although the report makes it evident that the infrastructure will come as part of the development, there are no specific plans or details provided. Developers may be made to build local healthcare, school and community provision however what about the staff and funding to run them? It is all very well to build schools but there is already a national shortage of quality teachers so where will they come from? Furthermore, with such an increase in numbers however will Oldham / Rochdale hospitals cope with the added pressure?
- Already waiting approximately two weeks to get in at a local doctors and hospital waiting times will only get worse as Oldham Hospital is already struggling to cope with a swelling demand.

Community:

- Loss of 'village life' and village identity.
- Communities would be divided by the location of the development.
- An influx of new residents would disrupt the sense of community built by locals.

- Cheap housing would impact on the close knit community
- A faceless development would negatively impact on community spirit.

General:

- The GMSF is a poorly written document which breaks do many planning regulations it's hard to know where to start. For example, there is no mention of affordable housing or of how emergency services will be affected.
- Proposal's would destroy the village's character forever and completely overwhelm all services – doctors, schools, council, the road system etc., which is already virtually at breaking point with the current population.
- The reasoned justification states that, it will be necessary to put in place the supporting social infrastructure.....This will include a small local centre, comprising retail and community facilities that will help to act as a focus for the new development. It is considered that this would have detrimental effect on existing local shopping centres. Investment in the existing retail areas and reusing existing shops would be more beneficial for the existing communities and help to bring businesses back to the local area.
- Chadderton's farmland should not be used for housing.
- The unfair allocation result in disproportionate impacts on traffic, pollution, healthcare requirements etc. If the allocations were spread out evenly across the borough the impact of such traffic, pollution and healthcare requirements would be shared across the borough as a whole, thereby reducing the impact on any particular area.
- The proposed development would destroy the views that the people in Newhey and Milnrow see for miles around. Areas like these, where people chose to live due to their surroundings and the views they offer, are needed to support the regeneration and enhance the reputation of Rochdale.
- Lack of infrastructure and facilities within Shaw. Over the years the town hall has been taken and demolished, cinema closed, swimming bath and gym demolished, the market has shrunk, police station has gone and medical centre is doctors only with no podiatry or dental work.
- Seems foolish to be pressing on with plans for building when we don't know what the future holds in relation to Brexit and migration. The need for employment space which led to the figures proposed at NG3 has not been reconsidered following economic uncertainty raised from Brexit.
- Concerns over the value of property decreasing with the development.
- Many established farms will be lost, which is destroying the farming trade, which we should be going back to producing our own food. The loss of a tremendous amount of farm land at a time when we are being told that the production of sufficient quantities of food will, in the future, be a major concern for the citizens of our planet.
- Noise impact of the construction would impact on residents' quality of life.
- I run Birds of a Feather Animal Rescue, situated on the Greenfield Sites that you are proposing to build industrial units on with the proposal of the slip road off the M62 J21 at Milnrow. If your proposals go ahead, are you going to help relocate over 100 large animals and cover the costs of moving and recovering the cost of buildings that you will knock down to build on top of?

- It appears the allocation of sites in Rochdale is motivated by an unlawful purpose, namely a desire to maintain high end property values. It is an established administrative law principle that statutory powers cannot be used for an improper purpose. If any of the drafting and decision team live in one of the latter areas, then the disproportionate loading onto NG3 would also be tainted by conflict of interest.

Consultation Process:

- Concerns raised over the transparency of the process. Object to the proposed developments on the grounds that the people of GM have not been involved in the preparation of the GMSF or making a decision over how GM should develop over the next two decades.
- There is not enough detail in the consultation document.
- It is poorly written.
- The drop in event in Shaw had unclear map, needs a key and there was a lack of flow. It should have been arranged at a less busy time.
- Website is not user friendly.
- Overall concern with these plans are you are not being open about them, not contacting residents directly and actually not looking at what is here already and if this goes ahead how can you make this work so it is in keeping with the current natural environment, and does not impact the happy residents of Newhey.
- Feels like the proposals have already been decided.
- This development has not been brought to the public's attention by the planners. I only became aware of this by local word of mouth. My solicitor did not advise me of this development when I recently bought my house as it did not show up in the local search, AND I am not the only local resident to have this issue.
- At no time did any of the local Labour Councillors who live in Milnrow & Newhey, nor did the Leader of Rochdale Council (who recently objected to houses being built on green belt near to his home) hold any public meeting in my village to discuss in the community the issues we may anticipate. All of whom use local facilities in the area and should know that the community will be affected significantly.
- Local Councillors including the Leader of Rochdale Council use amenities and facilities in Milnrow but have not once mentioned to the community any of the issues around building 1500 houses on green belt land through the corridor of Milnrow,
- I also object to the way that this consultation has gone ahead without the knowledge of the general public. It seems to me that the bulk of the work towards this coming into fruition was done before any of us even knew. In particular people like myself who were purchasing property if the knowledge that this was report / consultation was being prepared would have influenced our decisions. We would have at the very least waited until an outcome before committing to a lifelong investment which could be jeopardised should this go ahead.

Comments in support of strategic allocation:

- The area needs more houses and employment opportunities which will be of great benefit to the communities.
- We are in complete support of the proposal to develop this area of land and as owners of land (Field number 334) in High Crompton which is closest to the existing settlement we are willing and able participants in terms of the allocation and would be in favour of the field

being developed. We totally appreciate that more houses have to be built and there is no option other than to use Green Belt land and High Crompton and Shaw would benefit a great deal.

[Comments from organisations](#)

[Chadderton Historical Society:](#)

- Whilst accepting the need for future housing and industrial developments, the Society feels that the proposed scheme is totally disproportionate and drastically requires reassessing.
- Since the Second World War the following private housing estates have been constructed within Chadderton, each significantly diminishing the amount of former open space available for recreational pursuits: Fold Green, Cathedral Road, Rydal Avenue, Firwood Park, Irk Vale, Swallowfields and Hunt Lane. In addition there are a number of council housing schemes in various parts of Chadderton that date back to the 1920's. All these development, whilst providing necessary housing, have encroached on former open land. Chadderton now has more than its share of housing developments without further inroads being made into our remaining greenbelt land.
- There are brownfield sites available in central Chadderton, such as in the Stock Brook area, which could be developed for housing. Such site should be given priority when contemplating future housing needs.
- Land is available on Broadway Business Park for further industrial development. There always seems to be vacant businesses in this area, whilst the designated industrial land could support extra industrial use of it were reorganised to avoid unnecessary wastage of land.

[Shaw and Crompton Parish Council](#)

- Proposals represent a massive and inequitable land grab in Shaw and Crompton.
- The selection of these sites is disappointing and disconcerting, other options must be considered – new homes should be built on former industrial brownfield, derelict and unloved sites first; existing planning permissions need to be actioned; and the large numbers of empty homes brought back into use.
- Improved transport is a critical obstacle to be overcome to ensure the success of the expansion desired in the GMSF. Many of the strategic allocations are sited near motorway corridors, 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 on feeder and local roads.
- All the sites identified within Shaw and Crompton are devoid of good vehicular access. Cowlishaw has no acceptable roads leading into the proposed site. Topography around Whitfield Farm makes it difficult to envisage an elegant solution to site access. Beal Valley is currently served by only a narrow road and desire to enhance links to Shaw Metrolink Station seems incredulous.
- The increase in population will necessitate the provision of additional services, the funding for which is inadequately addressed through the GMSF. Schools, hospitals, play areas and leisure facilities, shops, health centres, doctors and dentists must be available as the houses and employment are developed. Expansion of our emergency services will also be required to provide safe communities in the future.

- An important vision for the GMSF is the quality of GM's environment. Green Belt plays a part in this but there are important green space, parks, rivers and canals in the heart of our urban communities which are equally valuable.
- In view of the above it is difficult to understand why the specific green sites in Shaw and Crompton have been proposed – all are notable attractive open spaces providing pleasure, relaxation and health benefits; they include public footpaths enjoyed by many including those important to the historic Shaw & Crompton boundary and Crompton Circuit walks; they have a diverse range of flora and fauna; and they provide 'green lungs' and which minimise urban sprawl between built up areas.
- The Green Belt and open space within Oldham are areas of pleasant natural beauty that make us unique in GM.
- The Parish Council strongly advocates that no building on Green Belt or OPOL e undertaken until current issues are resolved for existing brownfield sites, outstanding planning permissions and empty homes. Only when these things have been done should we even consider developing vast tracts of our Green Belt land.

Councillor Howards Sykes, MBE

- Insufficient analysis of the how the deductions for population and economic growth were arrived at has been provided. Further specific clarification of the rationale would be welcome and is desperately needed.
- Proposals represent a massive and inequitable land grab in Royton, Shaw and Crompton with the devastation of the local Green Belt and OPOL.
- There is no justification for developing Green Belt and OPOL land before brownfield sites are developed (including empty mills and factories) and existing planning permissions are implemented.
- It is unfortunate that the consultation document does not identify the many sites that are available across the Borough other than those that currently sit outside Oldham's Local Plan.
- Improved transport is a critical obstacle to be overcome to ensure the success of the expansion desired in GMSF. It is paramount importance that the transport infrastructure is in place before development begins.
- All sites identified have constrained access.
- In Shaw and Crompton, the necessary infrastructure to support even our existing population is lacking. We have primary schools that are already overcrowded or full; a secondary school that is falling apart; a dilapidated Health Centre that is near cardiac arrest; no swimming facilities of dry leisure provision, precious few youth facilities and no municipal tip.
- It is difficult to understand why the specific green sites in Royton, Shaw and Crompton have been proposed. There has been a lack of balance in the review and failure to give necessary weight to the environmental and quality of life issues.
- The Oldham Council Liberal Democrat Party firmly believes that our precious green spaces should be protected and advocated the development of brownfield land before the development of any part of our precious Green Belt is developed.

Councillor Andy Kelly, Rochdale Borough Council

- Would like to see a plan built by communities, starting with a discussion about what we want for Newhey, Milnrow and the rest of the borough of Rochdale.
- The ten councils across GM have a long tradition of working together effectively where they agree, and doing things in other ways where they disagree. The councils have almost never tried to force everyone to go along a particular path against their will. I strongly support the GMCA, but do not believe that this work is best done at a GM level – it is just too remote from the local communities that will be affected.
- Object to the proposals for the following reasons: the council has a duty to protect woodland and wildlife under the UK Biodiversity Action Plan; loss of Green belt and farm land; loss of valuable recreational open space; disruption of local footpaths and bridleways; loss of natural break from other nearby communities; failure of the consultation to address local infrastructure issues; heavy traffic on local roads not suited to the amount of housing proposed; and excessive housing would increase the carbon footprint.
- The length of the proposed GMSF (20 years) is too long compared to plans from council's across the country (the majority of which are 15 year plans). If the GMSF as a 15 year plan this would reduce the requirement to 170,400 houses, which would take some of the pressure off building on green belt in places like Newhey.
- At a Full Council Meeting of RMBC on 14 December 2016, Council Leader and GMCA member Richard Farnell stated that all brownfield sites would "...be filled first before one foundation is laid on Green Belt land...." The GMSF, however, sets a target to 70% building on brownfield sites before building on Green Belt. Which statement is true?
- The Government has cut funding available to develop brownfield sites which means that they are viable to develop. We want to see more done to sue the existing brownfield sites.
- A recent report from Shelter found that the UK's ten biggest house builders are sitting on '14 years' worth of land, on which almost 1,000,000 houses could be built.'. Would like to see the GMCA work with these companies to establish how much land is being 'banked' and sat on in GM and how releasing this land for development would lead to a reduction in housing targets.
- There is no explanation of how the public transport improvements referred to within the GMSF will be delivered.
- Newhey and huge parts of Milnrow have suffered constant flooding problems in recent years and these will be exacerbated by further developments in the area. There is also the effect on the overall air quality of the area and the increase in carbon footprint.
- The potential development is so significant and Newhey and Crompton can simply not cope.
- The GSF is poorly written and breaks planning regulations, for example, there is no mention of affordable housing or emergency services will be affected.
- Consultation is fundamentally flawed and the failure of the consultation to address the issues raise above means that it is very difficult for local people to come up with an informed decision on plans.

Environment Agency

- We are currently working with the AGMA planning team on refining the flood risk evidence base and providing technical advice where needed. The aim will be to produce an updated

Strategic Flood Risk Assessment at a Greater Manchester scale and this will review all site Allocations. To meet the requirements of the National Planning Policy Framework (Para 100-102) we expect any outputs from this work to feed into an updated policy for this site.

- We support bullet point 3 where new development will incorporate high levels of green infrastructure and mitigate any environmental impacts. As part of this we would recommend additional reference to the use of soft or green sustainable urban drainage systems. This will support GMSF policies GM18 (Flood Risk) GM25 (Allocations). Green/soft SUDS have greater environmental benefits over hard engineered options (e.g. underground tanks/pipes).
- Our records indicate that there are several historic landfill sites within the allocation boundary. In line with other allocation policies and to comply with NPPF (Para 120-121) we recommend that the following wording is included: Take account of detailed ground investigations and, if necessary, implement appropriate remediation to areas of the site that have previously been subject to landfilling.
- Support bullet point 4 which recognises that areas of biodiversity is enhanced. We would ask that additional reference is given to the River Beal to support ambitions within GMSF Policy GM12 (River Valleys and Canals). This waterbody is designated as heavily modified and currently at moderate status under the Water Framework Directive (WFD). As such any development which impacts on this watercourse needs to ensure there is no deterioration and provide enhancement where possible. More specifically to meet the objectives of the WFD opportunities to re-naturalise and remove obstructions/hard engineered channels should be considered. Suggested wording (or similar) could be: Protect and enhance Fairywell Brook and Timperley Brook through naturalisation of this key habitat and provide corridors of strategic green infrastructure around these features.
- Our records indicate that there is an active landfill (Crompton Effluent Treatment Works) within the allocation boundary. Where detailed masterplanning is being considered for the site we would advise the following: New development within 250m of an existing landfill facility could result in the community at the proposed development being exposed to odour, noise, dust and pest impacts. The severity of these impacts will depend on the size of the facility, the nature of the waste it takes and prevailing weather conditions. If the operator can demonstrate that they have taken all reasonable precautions to mitigate these impacts, the facility and community will co-exist, with some residual impacts. In some cases, these residual impacts may cause local residents concern and they must appreciate that there are limits to the measures that the operator can take to prevent impacts to the residents.
- Where development is proposed adjacent to an active landfill we object in principle to any development within 50metres of the regulated site. The landfill operator will put controls in place to prevent or reduce landfill gas emissions, however should these controls fail there is a potential risk to human health. In the long term we would recommend that once this part of the site has been restored that this is used as an area for strategic green infrastructure / open space.
- The Environment Agency has a programme of flood risk capital work (known as the Investment Programme) and we have identified that a scheme for the River Beal is planned within the next 6 years. This falls within the Northern Gateway Strategic Location (NG3) allocation. Whilst Government funding is not guaranteed for this scheme we would welcome further discussion on how the GMSF can support this programme of work. In particular how

we could ensure land is safeguarded for flood risk management (Para 100 NPPF) and that it is embedded within any Infrastructure Delivery Plan.

- The area lies partly within a groundwater source protection zone 2 for a public water supply abstraction and there are records of private supplies in the area. We would expect any development within the source protection zone 2 to consider the vulnerability of the land and to propose suitable mitigation measures which will be employed to reduce the risk of pollution of groundwater.

Campaign to Protect Rural England (CPRE), Friends of the Peak District & NW Transport Roundtable:

- Newhey is a Pennine Township village in the Borough of Rochdale on the border with Oldham. Local residents are concerned about the harm to residential amenity and the merging of two distinct places on either side of the Oldham and Rochdale borders.
- Is the topography of this site suitable due to the impact of long-range views of development in the countryside?
- Presently the site is used as farmland, wildlife habitat of biological significance and is criss-crossed by numerous Public Rights of Way.
- Tree plantations on the side of Whitfield support local wildlife, birds and animal habitats and plant life and residents fear that losing these to development would be detrimental to the ecology of the area.
- CPRE understands that Rochdale developed the Kingsway Business Park in proximity to the M62 junction 21 which was first opened nine years ago and is still half vacant.
- There is an identified daily (morning, afternoon and evening) congestion of M62 motorway, main A640, A663, A671 roads and total gridlock of Newhey village. There are concern that the addition of further development of such a large scale will cause even more congestion of the motorway and local road network. Due to the persistent standing traffic air quality suffers and people have associated health problems such as respiratory conditions.
- The proposed development would be higher than the motorway and there are concerns that the health of the people in the new housing would suffer. Noise pollution is also considered a problem.
- Flooding of the River Beal is an issue in Newhey in recent years and the neighbouring village of Milnrow.
- In the past year 70 new houses were brought forward on a brownfield site in the centre of the village. CPRE is pleased that this site was brought into use, however additional infrastructure is needed to cope with the additional demands.
- Green Belt provides an important function of keeping two distinct townships from merging on the border of Rochdale and Oldham. It is an important green lung for an area with poor air quality associated with the traffic problems.
- For these reasons this is not a suitable site to be released from Green Belt.

Grasscroft:

- Grasscroft supports proposed allocation NG3 for major mixed use development because the Site comprises a significant opportunity that could reasonably be unlocked over the Plan period.
- Considerable investment will be required to deliver the necessary highways infrastructure to link to Junction 21. For this reason, Grasscroft believes that the proposed mix of

employment to residential should be altered to reduce the quantum of employment space and increase the residential element that will be needed to enable the likely considerable infrastructure costs.

- This rebalanced mix would also fit more comfortably with the topography of the Site which undulates and is more suited in the main for a finer grain of development afforded by residential use compared to larger footprint of industrial and warehouse space.

Eastern Gateway

Who Responded

There were 18 submissions to this section. These were from 11 individuals, no couples or other family groups, no unknown people (name not supplied/illegible), two political organisations (High Peak Borough Council, and Saddleworth Parish Council), no known developers/landowners, and six other organisations:

- Environment Agency
- Friends of the Earth
- Natural England
- The Campaign to Protect Rural England, Friends of the Peak District & The NW Transport Roundtable (single submission)

Summary of Issue(s) Raised

Green Belt

A number of respondents objected to the loss of Green Belt with specific points raised around:

The loss of Green Belt would allow the coalescence of distinct communities/settlements such as Ashton-under-Lyne, Droylsden and Audenshaw.

The provision of commuter housing for those working in other districts; and

The loss of Green Belt and its green lung function with its impact on health and wellbeing, quality of life, wildlife habitat, formal and informal recreation opportunities.

Site Selection

Overall there were no specific comments on site selection; however, a number of respondents suggested that brownfield sites should take precedent for development rather than Green Belt sites.

Infrastructure

General concerns were expressed by a number of respondents around existing congestion issues and future road and public transport capacity. Specific concerns were raised by Friends of the Earth and the Campaign to Protect Rural England (CPRE), both of which objected to future road developments including, motorway upgrades, the Mottram bypass and the concept Trans-Pennine Tunnel. Both of these organisations emphasised the need to focus on sustainable transport solutions and supported the proposed Droylsden Railway Station, enhancements to active travel infrastructure, Metrolink and bus.

However, a number of respondents proposed an opposite view and that developing road infrastructure was essential before any of the new development took place. One respondent suggested that the M60 J25 improvements should include an A6 to M60 bypass.

One respondent was not convinced by the need for a new railway station at Droylsden because of the existing Metrolink service and the fact that the rail service is already overcrowded at peak times.

Derbyshire County Council and High Peak Borough Council specifically identified inclusion of the potential sustainable transport route through Hadfield and Glossop (off-road multi user) as an alternative to the A628.

The Peak District National Park Authority objected to the specific identification of the 'Mottram-Tintwistle bypass' as this is a misrepresentation of the schemes that is on the table as only Mottram has been proposed.

Flooding and Water

Some respondents highlighted the role of land in rainwater infiltration and storage and that the land should be managed to increase this function in order to reduce the risk of flooding.

Health

Several respondents highlighted the existing strain that healthcare facilities are under and that any development would exacerbate this unless appropriate new infrastructure was included in the proposed development.

Pollution and Air Quality

Friends of the Earth stated that the GMSF needed to provide site specific assessments of the impact of the proposed development on air quality for all proposed development locations.

Green Infrastructure, Biodiversity and Landscape

Many respondents commented that the loss of existing green infrastructure was unacceptable and that policy proposals for enhancement could not offset the development of existing GI areas.

Several respondents, including CPRE and Friends of the Earth, highlighted the proximity of the Eastern Gateway to the Peak District National Park

Heritage

No specific comments were submitted relating to heritage issues.

Employment Development

There were a number of objections to new employment development in the Green Belt. Several respondents stated that there was existing vacant stock and that this should be refurbished or redeveloped in preference to new Green Belt development.

One respondent felt that smaller employment sites were required for development rather than the focus on larger ones.

Other Comments

The Environment Agency (EA) objected to the policy because low carbon and district heat networks in strategic locations are referenced in the Low Carbon policy, but not in the strategic locations policy. It recommended reference within the SL7 policy wording in order to integrate both.

In addition, the EA asked that additional wording is included to reflect this so that the strategic location policy supports wider GMSF policies on Natural Environment and recommendations within the Integrated Assessment (Table 8).

A number of other respondents, including Natural England, highlighted the role of peat rich areas in the sequestration of carbon dioxide and objected to the both the removal of peat from Ashton Moss and Littlemoss and the development of the area. One objector also highlighted Ashton Moss as an area of nationally diminishing environment.

One respondent felt the policy lacked detail and that the policy should be revised in line with Policy SL8 so that planning permission would not be granted until transport infrastructure improvements had been secured, i.e. the Mottram Bypass and Woodhead Trans-Pennine Road Tunnel.

[EG1 Little Moss/Ashton Moss](#)

Who Responded

There were 65 submissions to this section. These were from 42 individuals, three couples or other family groups, no unknown people (name not supplied/illegible), one petition with 111 signatures.

Two political:

- Cllr Maria Bailey
- Tameside Green Party

Three developers/landowners:

- Arqiva
- Miller Homes North West
- Taylor Wimpey Limited

Four other organisations:

- Ashton Allotment Action
- Environment Agency
- Friends of the Earth
- Historic England

Summary of Issue(s) Raised

Green Belt

The majority of respondents objected to the loss of the Green Belt for a wide range of reasons: loss of recreation opportunities for local residents, loss of quality of life, loss of wildlife habitat; loss of an area that acts as a 'green lung' and the increased risk of flooding.

In addition several respondents were concerned that no logical green space alternatives have been demonstrated or effort made to avoid the proposed development of the Green Belt.

Some respondents noted that the loss of the Green Belt at Ashton Moss and Littlemoss would mean the joining of two towns, contrary to national Green Belt policy.

One respondent contended that the existing open Green Belt space was popular because alternatives such as Daisy Nook Country Park was not a safe place for a single person to carry out recreation, even dog walking.

Taylor Wimpey support the removal of Green Belt designation and the allocation of land for housing development on grounds that:

- it would deliver sustainable development;
- the land does not fulfil Green Belt purposes; and
- there are no insurmountable constraints to prevent development taking place; and it is deliverable in the next five years.

Taylor Wimpey also raised other points: Whilst acknowledging the findings of the GMGBA they suggest a Green Belt Review should be produced to incorporate a review of Call for Sites submissions. However, they also contend that exceptional circumstances exist for GB release due to housing need and the lack of land supply and they argue that the site makes little or no contribution to the five purposes of GB.

Miller Homes contended that the proposed release of the land in EG1 indicated that the site as a whole, and in part, does not meet the requirements of paragraph 80 of the NPPF. Miller Homes also stated that the GMGBA highlighted key urbanising features set within the relevant parcels and that these compromised their Green Belt status. Furthermore the need to release Green Belt for housing indicates that the housing requirement cannot be delivered of derelict and other urban land.

Site Selection

Many respondents supported an alternative brownfield first approach to development with a focus on town centres regeneration/redevelopment and key public transport infrastructure, such as the Ashton Moss Metrolink stop.

Several respondents highlighted the potential for developing the brownfield site of the former Littlemoss School for residential.

Several respondents believed that there was sufficient brownfield land available to achieve the growth required.

One respondent suggested that land to the rear of 'Shepley Park' which was proposed as an Aquacentre by the council a number of years ago is considered for much needed development in the Audenshaw area.

Arqiva identified two previous submissions they've made on GMSF sites during the previous consultation in relation to Land at Ashton Moss West and Ashton Moss Plot 3000. Both sites are identified currently utilised for broadcasting purposes but would be available in the early to middle plan period therefore providing the opportunity to redevelopment these significant sites. This representation specifically covers the sites referenced as EG1.

Arqiva also broadly supported the allocation of the site for development through the GMSF guided by a SPD. Support the policy intention to remediate the site. Support the development of Ashton Moss West but consider that the western section of the site in their control is better suited to residential development as part of a mixed use scheme. Their site represents a logical rounding off

of existing residential development. Suggest that the wording of policy point 9 is revised with additional wording 'New point number: Deliver residential development to the western section of the Ashton Moss West Site where it adjoins the existing residential settlement."

Taylor Wimpey stated that the development of the site will deliver a range of economic, social and environmental benefits. In addition the site is also considered to be deliverable, could be progressed in advance of the wider allocation and would assist in meeting the borough's five year housing land supply.

Miller Homes support the overall proposed allocation, with four parcels of land covered with all sites being well connected to the urban areas of Ashton and Droylsden.

Miller Homes also stated that the sites were available, suitable and deliverable: Availability – Miller Homes in partnership with the landowners (Trustees of the Stamford Estate) are committed to the active promotion of the sites. The sites were promoted through the GMSF call for sites process. The sites are available in the short term. Suitability – Both sites have the potential to deliver a broad mix of types/size/tenure of housing, ranging from starter through to executive homes. Miller Homes and the Trustees of The Stamford Estate support the approach set out in the policy for SPD/Masterplanning/design codes. Both sites represent sustainable locations given the proximity of existing services, infrastructure and good links to public transport and road infrastructure. Deliverability – Miller Homes believe that the sites could be delivered in the short term to assist with the lack of a demonstrable 5 year housing land supply and there are no known abnormal development costs that would prevent this.

Miller Homes also recognise a wide range of issues relating to the development of the sites that need to be sensitively dealt with including: heritage assets, trees, drainage and flooding, contamination, ecology, highways and access, public rights of way and topography.

Infrastructure

Many respondents were concerned about the impact of the proposed development on existing transport infrastructure such as roads and public transport provision. Issues linked to existing and expected congestion were also highlighted, ranging from air quality and pollution through to the lack of, and poor quality of, public transport services.

The majority of the respondents objected to the proposed development because it would further compromise the inadequate transport infrastructure and increase congestion problems.

One respondent stated that the existing train service is so overcrowded that there would be no capacity for a station at Droylsden.

One respondent put forward further suggestions for significant road improvements to improve journey times into Manchester and the removal of all bus lanes.

Several respondents also pointed out the issues caused by increased traffic associated with the arrival of Curzon Ashton FC at their current site.

United Utilities observed that several large pressurised water mains and sewers cut through the site, in addition to existing UU easements that need to be considered. Additionally UU pointed out that consideration must be given to the disposal of surface water in the most sustainable way.

The majority of respondents raised the impact on health care provision and school places as a significant issue.

Taylor Wimpey highlighted a number of issues in relation to infrastructure requirements - principally concerning the nature of some of the infrastructure required and the mechanisms for delivery (Droylsden Station and the link road). It is important that any infrastructure requirements are fully justified and evidenced (costs, funding methods and delivery mechanisms). Any infrastructure requirements that need to be funded through the proposed development should be related to the site and the wider allocation and comply with the tests set out in the CIL Regulations. The requirement for a station at Droylsden needs to be considered in sterilising part of the residential development site.

Miller Homes stated that existing bus stops and existing pedestrian routes are in close proximity to the sites. Further details were included on the proximity of the sites to key services and infrastructure which concludes that both sites relate well to nearby infrastructure.

Flooding and Water

Several respondents expressed concerns over the development of the marshy land and the impact that would have on water levels. In addition the flooding present on the M60 during heavy rainfall as indicative of the impact of development in a wetland area.

Another respondent also commented that continuing to remove green and open spaces will contribute to pluvial flooding. Managing flood risks by increasing infiltration and providing areas for water storage is very important and all areas of Tameside need to retain green and open spaces for this reason.

Lancashire Wildlife Trust suggest that the text relating to Sustainable Drainage Systems at point 16 be amended to read "16. Incorporate Sustainable Drainage Systems within the site, for example, through the use of green roofs, permeable surfaces, swales and detention basins. To conform to current terminology: Sustainable Drainage Systems (SUDS) may be rural or urban."

A number of respondents specifically identified the area to the rear of Lindisfarne Road as an important drainage area containing a number of ponds.

Health

One respondent stated that poor life expectancy in Tameside was directly attributable to worsening air pollution and that this was compounded by the opening of the M60. The existing health services cannot cope with the rising demands from pollution related health issues. Since the improvements bought about by the Clean Air Act of the 1960's air quality has declined and Tameside has now reached saturation point and therefore the health and well-being of current and existing generations needs to be taken into account.

One respondent linked the loss of Green Belt to the need to think about exercise for children given reports about increasing obesity levels in the population.

Pollution and Air Quality

Air quality and pollution, specifically the potential increased air pollution from increased traffic levels and construction work, were raised as significant issues by a high number of respondents.

The link between the GMSF acknowledging the great importance of peatlands in absorbing CO₂ and the proposal to build over the remainder of Ashton Moss and Littlemoss was questioned by one respondent.

Green Infrastructure, Biodiversity and Landscape

Overall most respondents objected to the loss of the green space in the area as it is needed for quality of life, recreation and wildlife.

Several respondents highlighted the need to take account of existing trees and green infrastructure on the site and expressed concern at the proposed loss of green infrastructure, despite the identification of new/enhanced GI in the policy.

One respondent objected to the loss of the 'obvious green corridor for wildlife'. In addition it was stated that part of the land is being left to recover into a 'superb habitat for wildlife' and that it should be protected as a unique habitat within Tameside.

One respondent highlighted the potential archaeological interest in the Littlemoss area.

A number of respondents were concerned about the potential loss of the replacement allotments that were required as a result of the previous Ashton Moss development.

The Environment Agency supported the wording of the policy in relation to GI but would welcome specific reference to Lumb Brook and the provision of a GI corridor around this asset. Some concerns were expressed in relation to bullet point 7 and the proposed removal/relocation of peat, specifically in relation to subsidence and the release of stored carbon. Any development on peat should therefore be supported by a detailed hydrological assessment to demonstrate there is no detrimental impact on the water environment

It was also stated by one respondent that peatlands should be left in their natural state and location in order to retain any ecological value and concluded that this poorly located development contradicts the Policy GM8 hierarchy of avoidance/mitigation/compensation.

Another respondent highlighted that councils should be trying to reduce carbon emissions by sequestration and storage of peat, particularly by using peat and trees and not contributing to the problem of greenhouse gas emissions by building on this peat land.

Natural England raised two points of concern, firstly, that the proposal for the removal and relocation of peat should be avoided and secondly that the allocation should recognise the presence of the Huddersfield Narrow Canal SSSI.

Lancashire Wildlife Trust noted the requirement under point 7 for the remediation of the Ashton Moss West site (including a strategy for the removal and relocation of peat) and suggest that the almost worked out Astley Moss East quarry would be a suitable location for relocation of peat to create a secondary peat-based wildlife habitat and to minimise the release of sequestered carbon from the extracted mineral peat by keeping it saturated with water.

Cheshire Wildlife Trust point out that the site incorporates an area of Priority Woodland Habitat and that in accordance with the mitigation hierarchy set out in the NPPF this area must be protected

from development (i.e. avoidance measures). CWT suggested that a minimum 15 metre buffer is required in order to protect the habitat.

Cheshire Wildlife Trust also stated that consideration must be given to how this site would affect the Ecological Network for Greater Manchester. A final decision should only be taken once this piece of work is complete and the wider implications for biodiversity are clear.

City of Trees stated that Point 5 should specify that the green infrastructure be of high quality and at Point 12 it should be noted that high quality green infrastructure is important in creating walkable neighbourhoods.

Medlock and Tame Valley Conservation stated that the Hollinwood Branch Canal SBI will be threatened and the whole of the Medlock Valley and Daisey Nook Country Park will be vulnerable to further land acquisition should the Green Belt status be removed.

One respondent suggested that the proposed development of the Green Belt area would alter the historic landscape of Tameside.

One respondent objected to the development of the Ashton West site as following the previous tipping it was supposed to be transformed into a 9-hole golf course and that the site is now naturally regenerating and supports wildlife.

One respondent identified the Ashton Moss/Littlemoss area as one of the only places for some deprived communities to access the countryside. Given the accessible nature of the area it allows people reliant on public transport the opportunity to access and enjoy the countryside.

Several respondents highlighted the loss of existing public footpaths within the area proposed for development, therefore meaning less access to green areas for health and exercise.

One respondent was supportive of the proposal for additional trees and GI but at the same time concerned for welfare of existing trees within the proposed development areas.

Heritage

Historic England strongly objects to the proposed allocation because the site contains a Grade II* listed farmhouse and various Grade II listed heritage assets. The NPPF considers Grade II* listed heritage assets to be of the highest significance and any substantial harm to or loss of these designated assets (including setting) should be wholly exceptional. Historic England state that because a full Heritage Impact Assessment has not been carried out it is not possible to demonstrate that the principle and quantum of development can be achieved without harm to the historic environment. The Grade II* listed farmhouse appears to have a reasonably strong setting (farmhouse in a farmstead set in an agricultural landscape), therefore there is potential for any development to have a harmful impact on its setting.

Industrial Development

Several respondents stated that the industrial development proposed along Lord Sheldon Way was not acceptable and neither was the proposed extraction and relocation of peat.

One respondent identified that there was no justification given for needing more employment floor space and that this requirement is at odds with the existence of commercial units within the borough.

Housing

One respondent noted that the proposed housing mix is not representative of the current trend of leasing apartments close to the city centre and that the current housing stock and market in Tameside is currently adequate and provides a healthy balance between leisure/retail/employment.

One respondent suggested that the future housing allocation could include the refurbishment of 13,600 dwellings in the borough to approve aesthetics of the borough without destroying character.

A number of respondents identified the existing high number of properties for sale in the area as an indication of low demand and that there was therefore no requirement to build new dwellings.

However, another respondent suggested that this land next to Lord Sheldon Way could be developed to meet the accepted need.

Other Comments

The Canal and River Trust (CART) highlight the reference in the policy to the Hollinwood Branch Canal and that although this is not in the Trust's ownership it is aware of aspirations relating to the canal's restoration.

One respondent highlighted the negative impact that large retail outlets had made on local/small businesses and that this had been exacerbated by the impact of Metrolink construction on Droylsden.

A number of respondents queried what consideration would be given to existing properties that neighbour onto the site and the criteria to be used in terms of boundary treatment.

One respondent cited existing problems with speeding traffic on Lumb Lane and that no money is identified for traffic calming or speed cameras. The number of HGVs already using Newmarket Road and Lumb Lane was highlighted as an issue.

Several respondents stated that the proposal does not take into account the likely slow-down in mass immigration through Britain's exit from the EU.

One respondent suggested that there must be a large number of unemployed in GM that already have housing and that efforts should be made to support employers in creating sustainable jobs for these people.

Several respondents suggested that no consideration of the value of the land against proposed GMSF policies had been undertaken.

Several respondents identified the need to retain farming areas for food production.

Many respondents were concerned by the lack of neighbour notification and public engagement in the consultation.

One respondent objected because the data used to inform the development of the framework is flawed. Specifically the population forecasts used for the OAHN and the issues with even forecasting

population only a couple of years in the future. This undermines the legitimacy of future household formation which undermines the case for massive Greenfield development. Therefore the forecast should not be used by individual districts in order to legitimise green belt release.

Taylor Wimpey raised concerns about the devolved responsibility proposed in the draft GMSF for the delivery of site through a SPD - the correct approach is to deal with the site through a detailed policy in the Tameside Local Plan - setting out land uses, broad locations, infrastructure requirements, phasing etc. Also concerned about the time delay bought about by the SPD process having to follow on from the local plan. Therefore, allocation of the site in the local plan would enable it to come forward at the earliest opportunity.

EG2 Bredbury Park Extension

Who Responded

There were 13 submissions to this section. These were from 10 individuals, no couples or other family groups, no unknown people (name not supplied/illegible), one political (Stockport Green Party), no developers/landowners, and five other organisations:

- Environment Agency
- Historic England
- The Campaign to Protect Rural England, Friends of the Peak District & The NW Transport Roundtable (single submission)

Summary of Issue(s) Raised

The most commonly raised issues were the need for transport infrastructure investment prior to development (including concern relating to access through the neighbouring residential area) and the suggested fact that the existing industrial estate has high number of vacant premises and there is no need for more floorspace.

Concerns were also raised regarding the loss of grazing land, the impact on wildlife and impact on the river valley as well as with regards to the erosion of Green Belt between Bredbury/Brinnington and Denton/Haughton Green.

There was support for the enabling of sustainable access to the river valley for recreational purposes and inclusion of SUDS within the policy requirements.

EG3 Godley Green

Who Responded

There were 409 submissions to this section. These were from 367 individuals, 22 couples or other family groups, 1 unknown person (name not supplied/illegible), no politicians, two developers/landowners ('Godley Green Landowners', Redrow Homes), and five other organisations:

- Environment Agency
- Friends of the Earth
- Longdendale Community Group
- National Trans Pennine Trail Office
- The Land Trust

Summary of Issue(s) Raised

Green Belt

The majority of respondents objected to the loss of the Green Belt and this encompassed a wide range of reasons: it prevents urban sprawl and the joining of settlements, loss of recreation area for local residents, loss of public rights of way, loss of quality of life, loss of wildlife habitat; loss of the horse riding schools, loss of an area that acts as a 'green lung', loss of an area that absorbs rainfall and the likelihood of an increased risk of flooding.

Some respondents commented that the loss of the Green Belt at Godley Green would mean the joining of Gee Cross, Hattersley and Mottram and this was contrary to national Green Belt policy. Some respondents highlighted that the proposal would lead to continuous housing between Manchester and Glossop. Furthermore some respondents objected to the proposal because it contradicted Green Belt policy set out in the GMSF at policy GM13

A number of respondents supported the removal of Godley Green from the Green Belt and welcomed the Garden Village development. One respondent proposed that long term vision has to take precedence over short term objections in releasing limited and suitable land from the Green Belt and that the location, bordering the existing urban area made it a clear choice for removal from the Green Belt.

One respondent questioned the need to develop such large areas of Green Belt when considered against NPPF para 80 and para 83 and asked what the view of GMCA is on the unrestricted urban sprawl this development will cause, how it will safeguard the countryside from encroachment and how will it preserve the character of rural areas?

A number of respondent objected because they believed planners had previously stated that the Green Belt in Manchester would be retained and, in addition, that the special character of historic towns should be preserved.

One respondent stated that they were completely against the wholesale use of Green Belt for housing and development as these areas have saved communities for many years from industrial pollution.

One respondent suggested that any recommendation to re-classify the Green Belt should go to a public referendum.

One respondent questioned how, in the context of national planning policy relating to Green Belt, will the countryside be safeguarded from encroachment and how will the character of rural areas be preserved?

One respondent pointed out that Green Belt and wildlife are an important educational benefit to the local community.

HOW Planning submitted a representation on behalf of 11 landowners supporting the draft GMSF and the identification of the Green Belt land at Godley Green for residential development alongside supporting infrastructure and facilities. This also stated that the owners support the conclusion reached at Section 1.5.3 of the GMSF which states that Green Belt release is necessary within GM to

meet development requirements and that exceptional circumstances exist to amend existing Green Belt boundaries.

HOW Planning stated that the owners support the GMSF Vision and the statement at paragraph 2.0.6, of the GMSF, which confirms that larger sites are required for release from the Green Belt in order to maximise their sustainability and provide the basis for comprehensive development and ‘critical mass’ to ensure that new development is supported by adequate infrastructure.

Redrow considered that exceptional circumstances for releasing the site from Green Belt have been demonstrated in the supporting evidence submitted by Nexus Planning.

Site Selection

The majority of respondents supported a brownfield first approach to development with a focus on town centres regeneration/redevelopment and key locations accessible by public transport infrastructure. In addition a number of respondents suggested that the provision of basic housing should be used to support town centres regeneration.

A number of respondents highlighted the poor quality of Tameside’s town centres as places to live and visit. One respondent suggested that the town centres were lacking in historical presence, imagination, green space and water features and suggested that the city and town centres need to build ‘smart’ and upwards.

One respondent suggested that improving and redeveloping the ‘forgotten areas’ to encourage enterprise and engagement should be pursued rather than pushing these areas further away from society. Furthermore, one respondent criticised the prioritisation of spend and resources on Ashton-under-Lyne rather than Hyde town centre, this point was also reiterated in relation to the lack of investment in Stalybridge town centre.

Other areas suggested as opportunities and in need of improvement and investment were identified, including Gorton and the area around Oxford Road in Manchester.

The majority of respondents believed that there was sufficient brownfield land available to achieve the growth required and a further high number suggested that there should be only be a reassessment of the housing requirement when this source of land had run out. A range of brownfield sites were suggested as suitable for housing development:

- Caxton Mill (Jumping Jacks), Hyde;
- ABC Wax, Hyde;
- Area of Hyde Road from Ardwick Green (A57);
- Cleared land adjacent Tesco Extra in Hattersley;
- Ashton Brother (Christy Towels) in Flowery Field;
- Former UCD dairy site (Broadway 67), Hyde;
- Roberstons Jam, Audenshaw; and
- Mono NOV, Audenshaw.

One respondent highlighted the CPRE research relating to the amount of brownfield land available for build housing, in addition to ‘land banking’ by house builders.

Many respondents felt that Green Belt was being chosen simply on the basis of its cheaper development cost and that it is less complex than developing brownfield sites.

One respondent stated that they understood the need for new housing although they did not favour building on agricultural land, but that there was logic in building at the scale of the proposed Garden Village.

Another respondent rejected the notion that a Garden Village was being created and that the proposal was simply an expansion of the GM urban area, for the reason that a Garden Village was defined as one surrounded by countryside.

Several respondents suggested that development should not be focussed on large strategic sites but should be spread around in order to lessen the impact on the existing population. One respondent suggested that the maximum size of development should be 500 units.

Many respondents suggested that the plentiful cleared sites in Hattersley should be used for new housing rather than the Green Belt. However, a number of respondents pointed out that Hattersley was overpopulated and had no shops or facilities.

One respondent suggested that extending existing built up areas was not the solution but that building more new towns was.

One respondent supported Green Belt development in circumstances where all brownfield alternatives had been explored and then developed first. This was complimented by another respondent who suggested that small scale Green Belt release should only be allowed after all brownfield and empty properties are used. They went on to state that only following use of all brownfield sites should small tranches of Green Belt be drip fed for development.

Longdendale Community Group commented specifically that the release of Green Belt was flawed because it will undermine the brownfield first approach of the plan and that there are inherent contradictions between the proposed Green Belt release and the thematic policies in the GMSF.

Longdendale Community Group also objected because they felt the plan was developer led rather than community driven.

One respondent supported the release of Green Belt if it could be used to cross-subsidise brownfield sites with difficult remediation issues and they would therefore like to see a more explicit policy mechanism to accommodate this.

Mr Jonathan Reynolds MP supported the proposal for a Garden Village as it would ensure that new infrastructure is delivered alongside new housing. Harnessing the value created by building a village on this site, could ensure that the village features a new school, new roads, and other facilities such as shops and, preferably, a GPs surgery. This approach would capture the value created by building houses in this area for public, rather than private, gain. However he recognised it would be a complex and difficult project to achieve, but believed a new approach to house building like this could be a significant development.

One respondent supported the proposal because the Garden Village would free up land that is mainly used for grazing horse and livestock and for horse riding by just a few people. They evidenced

this by stating that the area is currently used by only a few people and that the current footpaths and bridleways are virtually unusable and that they supported the policy proposal to include safe walkable areas, delivery of children's playgrounds etc. for community use.

Mrs Mitchell and family supported the development of the site and proposed that the land they own would be suitable for new development.

The Environment Agency identified an active landfill site at Greenside farm within the proposed site's boundary.

Redrow considered the site to be a highly sustainable location for development.

Infrastructure

The majority of respondents were concerned about the impact of the proposed development on existing transport infrastructure such as roads and public transport provision.

Congestion at the M67 eastern roundabout and through Mottram, on the A57, was highlighted as a very significant existing issue. In addition several respondents identified congestion and rat running using Hyde Road, John Kennedy Road, Ashworth lane, Broadbottom and Godley. A further respondent specifically identified local bottlenecks including: all routes out of Gee Cross, namely Dowson Road/Market Street Hyde, A560 Bredbury/M60 Junction 25, Mottram/Hollingworth/M67.

Many respondents stated that no development could or should take place until the Mottram/Tintwistle Bypass was complete. In addition many proposed that the capacity provided by this infrastructure would be absorbed by the additional traffic generated from the development of the proposed strategic site. In addition to delivering the bypass a number of respondents suggested that a decision was needed on the proposed trans-Pennine tunnel before future development could take place in the area.

Many respondents also highlighted the congestion and capacity issues at the M67/M60 junction at Denton, stating that this was a daily congestion point and that the junction capacity should be significantly improved before any development took place.

A number of respondents objected because the site is on the periphery of GM, meaning traffic to and from would need to travel excessive distance.

One respondent saw the proposed development as a way of pushing through the plans for a bypass, which they did not support.

One respondent did not believe that developers could adequately mitigate the impact on traffic as there simply isn't the room to widen roads in order to accommodate more traffic.

A number of respondents stated that a weight restriction on the Woodhead should be introduced to force HGVs to use the M62 and ease congestion. In addition one respondent suggested that HGVs should be banned from the area unless they were making local deliveries.

Other issues linked to existing and expected congestion were also highlighted, with a particular emphasis on increased pollution and the impact on air quality through to the lack of, and poor quality of, public transport services.

One respondent commented that the bridge to access Green Lane from St Pauls Hill Road is already showing signs of fracture because of increased traffic.

One respondent commented that there appeared to have been very little, if any, in depth research into the suitability of developing this area, such as a traffic impact assessment, which would reveal that the surrounding area is already struggling to cope with traffic.

Many people associated the potential increase in traffic with a reduction in road safety especially for children, pedestrians, cyclists and horse riders.

Several respondents were concerned about the impact of traffic problems on the ability of emergency services to operate effectively.

Many respondents stated that the existing train service is so overcrowded that there is no capacity for additional passengers, including capacity for car parking, at either Godley or Hattersley stations. Furthermore, a number of respondents highlighted that the policy does not state how the rail service would be enhanced with new trains or additional carriages and the question was asked whether discussions were taking place with franchise operators to remedy this? Additionally, it was highlighted that the rail service only benefits people working in Manchester and that there is no mention of public transport provision for those working in other areas.

Some respondents suggested that Transport for Greater Manchester needs to deliver more cohesive transport infrastructure which is attractive, affordable and above all reliable. Furthermore one respondent suggested that a radical rethink of the whole transport and road network is required.

Another respondent commented that although a green approach to growth is outlined in the GMSF, alternative transport methods, incentives for using public transport are not identified and what a reliable, efficient public transport would look like is not shown.

Some respondents supported the Garden Village principle and highlighted that the site is well placed to make use of existing railway infrastructure with a large scale development being able to deliver more supporting infrastructure.

Several respondents suggested that Hyde needed to be linked into the Metrolink system and that this could be used to support town centre regeneration.

The need for more park and ride facilities at Stalybridge was highlighted as being essential by one respondent.

A number of respondents highlighted that there needed to be more transport commitments and funding promises from central government, specifically in order to aid delivery of the houses that the nation requires.

The majority of respondents raised the impact on health care provision and education places as a significant issue. The difficulty in obtaining a medical appointment, capacity at Tameside Hospital, lack of school places, lack of local sixth form education locally were all highlighted as existing issues to support this argument.

Many respondents could see that real affordable housing was needed but so was the infrastructure to support it and that they were not aware of how this had been planned. However a number of

respondents saw the proposal as aimed at low income families that would also require support structures that had not been planned for.

One respondent declared that the level of care at Tameside Hospital was unacceptable and that it is struggling to cope with the existing patient numbers without the prospect of more housing adding to the burden. Whilst another responded that the additional strain on the hospital from patients would not be sustainable and additionally there is not enough parking at the hospital for the existing workforce and patients.

One respondent disagreed that providing new facilities, shops and services on the site would reduce the need to travel and that it would actually increase the level of congestion – additionally it was suggested that they would have a negative impact on the already struggling Hyde town centre.

Many respondents stated that the investment was needed to bring existing infrastructure up to an acceptable standard regardless of the proposal for new dwellings.

Contrary to many comments one respondent suggested that the proposal should make use of its proximity to an already established but underutilised motorway.

Several respondents questioned how any of the infrastructure improvements needed for the development would be delivered, including funding, location and transport upgrades.

One respondent stated that the existing bridleway network is already under pressure and more development would worsen this situation.

One respondent, who supported the proposal, stated that incorporating walking routes and cycle ways to access both Godley and Hattersley stations would make this much safer.

Longdendale Community Group highlighted that Transport and infrastructure was currently inadequate and nothing was proposed to address the specific needs of the housing proposed. It is essential to link the proposed development with new infrastructure.

HOW Planning commented on behalf of land owners that on point 10 the scope of potential uses in the proposed local centre could incorporate C3, children's day nursery, community facility, or local health care in order to give a degree of flexibility to the accepted uses. For point 11 Clarification was sought on the requirements for onsite primary school provision and whether financial contributions will be sought towards the provision of secondary school places off site – therefore the text should be adjusted to give a clear indication of the intention of the policy.

Mr Jonathan Reynolds MP proposed that building shops and services as part of a Garden Village should also minimise the impact on existing roads. It was also particularly important that this site is served by an existing rail line - key condition of development must be to either open up the other side of Hattersley station, or recreate the historic Godley station which is adjacent to the site.

Mr Jonathan Reynolds MP stated that the proposal must also feature the very highest standards of both new housing design and layout, incorporating lakes, children's play areas, cycleways, and good walking routes.

Mr Jonathan Reynolds MP also believed the Government should allocate funds to develop projects of this kind and, if possible, use those funds to offer to purchase at an uplifted rate any property within an agreed distance of the new development where the owners would prefer to relocate.

Highways England observed that that EG3 is located in close proximity to J4 of the M67 and this suffers from significant congestion during both peak and off-peak times, with unreliable journey times. In addition peak hour trips may look to use the local highway network or J25 of the M60, depending on destination.

Highways England noted that there is no specific requirement within the EG3 policy to contribute to any necessary improvement works on the SRN.

Highways England also noted that it will be important to determine how any requirement to contribute to interventions on the SRN will be proportioned between sites that rely on the same infrastructure (i.e. EG3/OA26). Highways England go on to specifically identify the proposed Mottram Relief Road that is timetabled for construction 2019/20 and that any development in this area is likely to have to be phased after construction of this route.

Highways England welcome the inclusion of local centres, the contribution to educational needs, creation of open and recreational space as this can reduce the need to travel for everyday purposes.

Highways England are concerned about the specific inclusion in Policy EG3 of the requirement to work with the LPA to develop an SPD – informed by a number of documents including a Transport Assessment. This could be considered unnecessary and confusing given the requirement for a Masterplan in Policy GM25.

United Utilities identify a number of issues:

- Large pressurised water main and sewers cut through the site.
- Existing UU easement which will need to be considered.
- Consideration must be given to disposal of surface water in the most sustainable way.

The Trans-Pennine Trail Office pointed out that if the EG3 proposal goes ahead that the development should include links to the TPT and funding to upgrade the existing route and remove access controls / barriers that are impeding legitimate use. They also highlighted that access should be for all users of all abilities and include signage and infrastructure. This would complement the TPT and provide a more secure route that will increase usage and positive economic impact for the local area.

Flooding and Water

Many respondents expressed concerns over the development of the land and the impact that it potentially would have on increased amounts of surface water run-off, water table levels and flood risk in neighbouring areas.

Many respondents highlighted the naturally wet nature of the land with many natural springs and several areas were identified, neighbouring the site, where a high water table is already an issue (St Pauls Hill and Firethorn estates for example).

The flooding issues in November 2016 showed that the existing drainage system could not cope with existing development and that building on the land proposed would worsen this by removing the natural drainage function of the land.

One respondent suggested that when new properties are built that eco-friendly green drive-ways should be factored in to offset possible future flooding due to run off.

The Land Trust commented that bullet point 15 should read 'retention basins' not detention basins'.

HOW Planning on behalf of the land owners stated that point 15 should recognise the dual role that Sustainable Urban Drainage systems can provide as for example permanent surface water attenuation ponds can provide ecological and biodiversity benefits.

Health

Many respondents stated that poor life expectancy in Tameside was directly attributable to worsening air pollution and that this was compounded by the opening of the M60. The existing health services cannot cope with the rising demands from pollution related health issues.

Many respondents linked the loss of Green Belt to the need to think about well-being, mental health and exercise for the population, specifically children, given reports about increasing obesity levels in the population. Many noted this was pertinent to Tameside which has poor health outcomes and higher than national average issues with mental health.

One respondent suggested that the loss of green space on the doorstep may lead to lower levels of activity with consequences for health and well-being.

Pollution and Air Quality

Air quality and pollution (including from light, noise and dust), specifically the potential air pollution from increased traffic levels, construction work and domestic heating were raised as significant issues by a high number of respondents. A number of respondents also highlighted the links between air pollution and respiratory conditions and Alzheimer's. It was also highlighted that air quality was not addressed in the plan.

Longdendale Community Group and others commented that in relation to air quality problems that planners should be thinking about ways of diverting traffic from the area not attracting more.

Green Infrastructure, Biodiversity and Landscape

Overall most respondents objected to the loss of the green space in the area as it is vital for quality of life, recreation and wildlife. The loss of habitat and the impacts on wildlife was highlighted as a specific issue and a number of people argued that the site had been selected without any knowledge of local wildlife.

Many respondents proposed that the development of the site would not enhance biodiversity but actually destroy it, in addition several respondents pointed out that "sensitive" landscaping or "green walkways" would not make up for the loss of valuable open space.

Several respondents specifically objected to the development because of its effects on SBIs (including the ancient woodland) and that the loss of such sites and the resultant decline in species is widely reported by the RSPB and DEFRA. The proposal to build on these SBIs conflicts with targets

for improving the status of wildlife and reducing the rate of loss of all natural habitats by 2020. Furthermore habitat loss will negatively affect the species within the area and those species that use it for foraging or as linking corridors, which allow them to move between areas.

One respondent commented that although the policy proposes enhancement of Werneth Brook and Brookfold Wood that development in the area would reduce the connectivity between adjacent habitats. Another respondent doubted that the proposal to protect adjacent wildlife sites would be adequate and they are likely to be degraded by people pressure.

Many respondents highlighted the need to take account of existing trees and green infrastructure on the site and expressed concern at the proposed loss of trees and green infrastructure, despite the identification of new/enhanced GI in the policy. This issue was also linked by a number of respondents to the role that trees play in combatting climate change through absorbing pollution and rainfall.

Several respondents commented that the proposal would create pockets or fragments of habitat that would be isolated by busy roads. Several respondents supplemented this argument by suggesting green corridors are only retained because they are topographically difficult to build on.

Several respondents stated that a full independent ecological survey of the area must be undertaken in order to conserve protected species.

Several respondents identified that there are re-located Great Crested Newts on the site having been moved to that location from the site of Alder High School. Longdendale Community Group suggested that the ponds within the allocation should be DNA tested for their presence and if this is confirmed there should be no development.

One respondent supported the proposal for the incorporation of green corridors to be retained for the use of indigenous wildlife in the area.

One respondent stated that local wildlife will be affected and successfully breeding birds of prey and several protected species will be displaced by the development.

A number of respondents stated that there needed to be a long term commitment for the long term up keep of green space within the proposed Garden Village.

The Environment Agency supported recommendation 5, which seeks to protect and enhance Werneth Brook but asked if explicit reference could also be made to Godley Brook so that is afforded the same weight within the policy.

Natural England proposed that GI enhancement opportunities are enhanced across allocated sites and they welcome such proposals for the Garden Village at Godley Green.

Natural England specifically stated that it is essential that the site allocation at Godley Green (EG3) recognises the presence of Brookfold Wood Ancient Woodland and ensures the development is sensitive to this feature.

Cheshire Wildlife Trust (CWT) pointed out that this site incorporates a designated Site of Biological Importance and further areas of Priority Habitat. Therefore in accordance with the mitigation

hierarchy set out in the NPPF these areas must be protected from development (i.e. avoidance measures).

CWT also suggested that a minimum 15 metre buffer is required to protect important habitat and that consideration must be given to how development of this site would affect the Ecological Network for Greater Manchester.

CWT stated that a final decision should only be taken once this piece of work is complete and the wider implications for biodiversity are clear.

The Woodland Trust strongly objects to the proposal as it is likely to cause damage to or loss of areas of ancient woodland within or adjacent to their boundaries. Development should be kept as far away from ancient woodland as possible – with a buffer between the ancient woodland and the development boundary. The buffer is suggested to be a minimum of 15m and according to Natural England should consist of semi-natural habitat. However, use of a 15m buffer is not effective in all cases and each proposal should be treated on a case by case basis.

The Woodland Trust is concerned about the impact on ancient woodlands contained in proposed development areas. As a starting point ancient woodlands should not be included in areas proposed for residential, leisure or community purposes as it leaves them open to the impacts of development. The Woodland Trust also believe that secondary woodland should also be retained to ensure that ecological networks are maintained and enhanced.

City of Trees welcomed the references to tree planting and green infrastructure in point 5 and 7, however, it should be stated the GI or tree planting should be of high quality.

HOW Planning stated that the owners they represent support the recognition at paragraph at 2.0.8 that the design of new development will need to respond to the existing Green Infrastructure network which is an important consideration within the draft Godley Green development allocation and also a major opportunity. They went on to point out that: under point 5 green and blue infrastructure can serve a dual purpose, i.e. surface water attenuation and informal public open space: under point 6 that the wording ‘where feasible and possible’ should be used to recognise that it may not be possible to retain all landscape features and where loss is involved that appropriate mitigation measures should be put in place.

Several respondents highlighted the loss of existing public footpaths and bridleways within the area proposed for development, therefore meaning less access to green areas for health and exercise. However, one respondent suggested that the development would have negligible impact on local people as there are only limited public rights of way across the land. However, another respondent stated that the GMSF makes no reference to the provision of bridleways (existing or proposed) and suggested that this should be included in sections 9, 10 and 17. It was also suggested that this policy presents an opportunity to create links whilst preserving and creating ‘wild life corridors’.

One respondent set out the PROW crossing the site (9 official designations: HYD/66; HYD/68; HYD 69; HYD71; HYD 82; HYD 83; HYD84 and HYD 88.) HYD83 and HYD68 are bridleways, these are used by horse riders, cyclists and walkers for recreation.

It was also pointed out by one respondent that only 9% of the PROW in Tameside are bridleways and that none of these should be lost.

One respondent was supportive of the proposal for additional trees and GI but at the same time concerned for welfare of existing trees within the proposed development areas.

A number of respondents stated that these areas could not be replaced by parks and number of respondents stated that Werneth Low Country Park is not a substitute for the farmland and pasture with natural paths of Godley Green.

Heritage

One respondent suggested that the houses on Green Lane would be of historical importance, with some dating back to the 17th century.

Housing

Many respondents objected to the proposed development of higher value executive homes for various reasons: that there was no demand; there are many executive homes already available on the market; affordable housing was needed instead; and they would bring more cars to the local roads.

Several respondents commented that the preference for higher value executive homes indicates that the intention is not to satisfy the basic need for housing.

Several respondents were supportive of new housing but on the condition that it was affordable, environmentally sustainable homes for first time buyers.

One respondent specifically expressed concern over the lack of plans to incorporate any low cost housing or housing for elderly or single people.

Several respondents supported the proposal and commented that it would add a new and attractive dimension to the boroughs housing offer whilst also freeing up some of the existing traditional housing stock.

Some respondents stated that the affordable housing requirement was exaggerated and this was supported by the fact that there were plenty of 2 and 3 bedroom houses in Tameside for sale. These in turn would be cheaper than new build and more suitable for first time buyers.

One respondent noted that the proposed housing mix is not representative of the current trend of leasing apartments close to the city centre and that the current housing stock and market in Tameside is currently adequate and provides a healthy balance between leisure/retail/employment.

One respondent suggested that modular housing could provide one solution to transform town centres into revitalised communities with affordable accommodation.

A number of respondents identified the existing high number of properties for sale in the area as an indication of low demand and that there was therefore no requirement to build new dwellings. This issue was highlighted through the lack of sales of the new development at Stockport Road, Hyde.

Many respondents proposed that efforts should be increased in tackling vacant and under used houses and other buildings. In addition it was suggested that this would aid in tackling multiple

issues, such as the environmental impression of neighbourhoods, crime/anti-social behaviour and loss of revenue. In addition one respondent suggested that there are plenty of empty properties in inner areas that using Empty Dwellings Management Orders these needed to be brought back into use as this would breathe life into these areas.

One respondent believed the development would help with reducing the housing crisis and enhance the lives of local people.

Mr Jonathan Reynolds MP also commented that the site should feature a variety of housing sizes and types, including a significant amount of affordable housing.

The Land Trust commented that many of the criteria outlined relating to the quality of development, such as design, green infrastructure and tree planting, should be expected in all new sustainable housing development through the creation of liveable places yet this is not specifically referenced in all cases.

HOW Planning commented that the owners they represent support the proposal to deliver around 227,000 additional homes across Greater Manchester over the period 2015-2035 (as is any future requirement to increase the requirement to meet OAHN). They went on to confirm that the owners broadly support the development criteria including the desire to provide a broad mix of housing including higher value executive homes.

Equestrian Activity

A large number of respondents objected to the loss of the riding schools (where many children learn to ride), and the livery/stabling facilities provided for an estimated 150 horses.

One respondent had conducted their own survey and identified that there were only ten free stable places available locally and therefore questioned where the displaced horses would go.

One respondent linked this issue to the economic value of equestrian activity to the local economy. This was supported by another respondent who identified evidence from the BHS that highlighted the health benefits of caring for and riding horses. In addition the upkeep of horses contributes to the local economy. Therefore they suggested this activity should actually act as an incentive to invest in better equestrian access and that more bridleways or multi use routes are needed.

One respondent requested on behalf of local equestrians that existing and new equestrian access routes are included in the plans for any development of this green belt area.

Mr Jonathan Reynolds MP commented that the proposal should retain or relocate the popular riding stable on the site, depending upon the wishes of the owners.

Other Comments

Many respondents queried what consideration would be given to existing properties that are either within or neighbour the site and the criteria to be used in terms of boundary treatment. This was coupled with a feeling that there had been a lack of consideration of the impact of the proposal on local residents.

One respondent commented that if the development was to go ahead that the local authority should work with the residents within the site area to reduce the impacts on existing properties.

Another respondent additionally asked whether any compensation would be available to residents due to planning blight.

Several respondents highlighted the lack of employment opportunities in the area and one respondent linked this to the continued developed of existing employment sites which makes the out commuting imbalance of the borough worse. In addition several respondents suggested that jobs needed to be created before thousands of additional homes were built.

Many respondents identified an inherent conflict between policies or statements set out in the GMSF, for example at 2.0.5 the GMSF states the aim of reducing the need to travel by directing development to areas that support urban regeneration and that this would not happen at Godley Green. Indeed, the proposal was opposed on additional grounds that it would contribute to the need to travel, such as for employment or education opportunities.

Several respondents suggested that no consideration of the value of the land against proposed GMSF policies (GM13 Green Belt, GM17 Air Quality, GM18 Flood Risk and Water Quality) had been undertaken and that development of the site would contravene Tameside saved UDP Policies: OL1 – no very special circumstances have been demonstrated for such inappropriate development and OL4 Protected Green Space as none of the exceptions criteria would be met.

One respondent said that the policy objectives in the GMSF were not specific enough, did the improvement of the population's health by 50% include mental health? They suggested this policy comment was meaningless and the GMSF was full of similar promises and vague aspirations none of which were

Several respondents supported development of this scale in order to support the concept of a Northern Powerhouse.

Several respondents, including the Longdendale Community Group, stated that the proposal does not take into account the likely slow-down in mass immigration through Britain's exit from the EU.

Several respondents stated a specific concern about the level of policing, both existing and in the future, this was also linked to a corresponding worsening of social issues.

Several respondents identified the need to retain farming areas for food production and that several agricultural business operated from the site. One respondent was concerned over the direct impact on their farming business as development of the sites would affect the running of the farm and considerably increase traffic levels which would impact on their ability to farm effectively.

A number of respondents identified the value of the site in attracting visitors to Tameside for walking.

One respondent asked whether the national and international plans for greenhouse gases have been totally ignored.

Several respondents suggested that the policy will only produce housing estates with no areas that people would want to walk or ride in.

One respondent mentioned the Government proposal for first time buyers to receive a 20% discount where properties are built on brownfield land but that none of this has been delivered in Hyde.

Many respondents were concerned by the lack of neighbour notification and public engagement in the consultation and commented that they were concerned over how the process had been handled with an apparent lack of clarity and transparency.

Longdendale Community Group cited a lack of compliance with the Localism Act with residents not being informed except through the efforts of the LCG. Furthermore there has been a lack of consultation with High Peak and therefore a failure in the requirements of the duty to cooperate.

Many respondents objected because the data used to inform the development of the GMSF is flawed. In addition several respondents stated that there was enough brownfield land to accommodate the ONS growth predictions. A range of specific examples and reasons were given:

- Stockport borough population which has fallen 1991 to 2011 and the official UK national population growth prediction of 12% to 2030;
- Population figures quoted were flawed and the trend is for the opposite to happen;
- Not convinced by the estimated population growth, stating that the Tameside population has plateaued;
- Stated population increase of c. 19,000 by 2037, is almost entirely in those over retirement age. The age group most likely to buy a house is forecast to decrease. Therefore, is the requirement for new housing being overstated;
- Population of Tameside will rise less than 4% and there are enough brownfield sites to accommodate this increase;
- More accurate predictions on the housing requirement are needed as the approach of the plan overestimates the housing need for Tameside

Another respondent stated that the Garden Village name implied a variety of house types, including gardens. Unfortunately some of the high density dwelling proposed would not and therefore inclusion of community allotments is suggested.

HOW Planning stated that the owners welcome and support the requirement identified in policy EG3 to work with the Local Planning Authority to develop a Supplementary Planning Document (SPD) for the site which will include the preparation of a masterplan. Such a masterplan could also be developed and approved through the creation of a Development Framework.

East Lancashire Road Corridor

Who Responded

There were 16 submissions to this section. These were from 13 individuals, no couples or other family groups, no unknown people (name not supplied/illegible), one political (Saddleworth Parish Council), no developers/landowners, and one other organisation; Natural England.

Summary of Issue(s) Raised

Housing need and supply

Peel and Milnes Gaskell support the allocations in the corridor, but Peel believe that Mosley Common should be extended.

[Loss of Green Belt](#)

Releasing Green Belt for housing reduces the integrity of the remaining Green Belt to perform its functions.

The GMSF allocations in the corridor will fill the gap between Astley and Boothstown and Mosley Common and Walkden, joining the settlements together.

[Highways, traffic, access](#)

The roads in Boothstown, Ellenbrook and Worsley are severely congested at peak times and will be unable to accommodate the traffic generated from the proposed GMSF allocations along the corridor.

Significant road infrastructure improvements are required to address traffic congestion in the area including more access points to the M60 and M62.

Recent housing developments (Burgess Farm, Astley Green, Bridgewater View, and a development by Countryside Properties) have not made any significant contribution to improving road infrastructure.

[Public transport](#)

There are no public transport services to other parts of Manchester where many local residents work.

The Guided Busway has not helped to alleviate traffic congestion in the area. It only serves people working in Manchester or along the East Lancashire Corridor between Leigh and Manchester.

Guided Busway services to Manchester are often full at Sale Lane in Tyldesley and are expensive.

The park and ride facility is always full resulting in many people parking on local roads. It is also difficult to access due to traffic congestion.

Improvements to public transport will not alleviate severe traffic congestion in the area. Improving access to the M60 and M62 is required.

[Nature conservation](#)

Loss of wildlife habitats including for owls, foxes, birds, foxes, deer, badgers, woodpeckers, cuckoos, bats, minks and great crested newts.

The EA recommend that the policy should cross reference to Policy GM15: Carbon Emission. Key waterbodies should be protected and enhanced in the corridor because they fail their objectives under the North West River Basin Management Plan. The policy should refer to the role of the natural environment in the corridor and the potential natural capital benefits from net gains in biodiversity.

Natural England state that the allocations should have regard to the Greater Manchester Wetlands Nature Improvement Area (NIA) objectives.

[Open space and recreation](#)

Loss of land used for recreation e.g. walking, dog-walking, horse riding.

[Schools, doctors' surgeries and dentists](#)

Local schools, GP surgeries and dentists are at full capacity and will not be able to accommodate demand from the site.

[Flooding](#)

Mort Lane floods.

[Retail and town centre facilities](#)

New shopping facilities are required to serve the increase in people living in the area, especially when Morrison's closed their stores in Tyldesley and Boothstown.

[Other issues](#)

Loss of farmland.

Support for releasing land from Green Belt to provide new employment opportunities.

[ELR1 North of Mosley Common](#)

Who Responded

There were 103 submissions to this section. These were from 82 individuals, 8 couples or other family groups, no unknown people (name not supplied/illegible), no politicians, two developers/landowners (Maxilead Ltd., Peel Group), and one other organisation; the Environment Agency.

Summary of Issue(s) Raised

Housing need and supply

The housing requirement for Wigan and for Greater Manchester to 2035 is too high because:

- The Campaign to Protect Rural England estimates the housing requirement for Greater Manchester to be lower at 9,894 dwellings per annum and 197,885 over the plan period. This includes a 5% buffer and is within the range of past delivery.
- The population projection for the 65+ age group is very uncertain.
- Recent forecasts from the Office for National Statistics (ONS) have shown a variance of almost 200,000 people between the highest and lowest population estimates for the year 2032 from the 2008, 2010 and 2012 forecasts, which shows how unreliable population projects can be.
- Lower immigration as a result of Brexit is not considered.
- Population projections are not always accurate; paragraph 2.20 of the Greater Manchester Green Belt Assessment refers to inaccurate population projects made in the 1960s.
- Census data indicates that the population of Greater Manchester is approximately at the same level as it was in 1921.

Less or no Green Belt land, including at Mosley Common, is needed to accommodate new housing because:

- A disproportionately high number of homes are proposed in the east of the borough.

- There is a considerable amount of housing already proposed and under construction in Tyldesley, Astley and Boothstown.
- Brownfield sites in the urban area should be developed instead.
- There are lots of vacant properties in the area which should be occupied before Green Belt is released.
- The density assumption of 30 dwellings per hectare (as applied in Wigan) is too low and is below the average density assumption applied across Greater Manchester.
- Wigan Borough can meet its housing need from sites in the urban area.
- The assumption applied in Wigan that 75% of plots without planning permission will be built on is too low.
- There is no evidence in the GMSF to demonstrate that previously developed sites and vacant properties have been searched for.
- Neighbouring authorities should help deliver some of Greater Manchester's housing needs.
- New towns should be built to deliver new housing instead of extending existing urban areas.

New homes on the site will be unaffordable to most people as house prices in Tyldesley, Astley and Boothstown are very high. How many affordable homes will the site accommodate as there are no details of how new homes on the site will address local social housing needs?

Loss of Green Belt

The site occupies a Green Belt parcel (WG080) that performs strongly against the purposes of Green Belt as it forms a critical gap between Tyldesley, Little Hulton and Boothstown. Developing part of this Green Belt will affect the integrity of the remaining Green Belt parcel to perform its function.

The development will merge the settlements of Astley, Mosley Common and Tyldesley together.

Development of the site and the other nearby GMSF allocations (Cleworth Hall, Astley Boothstown Mosley Common, East of Boothstown and Hazelhurst Farm) and large existing development sites (Chaddock Lane, Garrett Hall, Astley Point, Burgess Farm and Vicars Hall Lane, Land Rear of 64-114 Mosley Common Road) will result in urban sprawl and merge Tyldesley, Mosley Common, Astley, Boothstown, Walkden and Worsley.

Releasing land from the Green Belt for development is contrary to the NPPF and the Wigan Core Strategy.

Exceptional circumstances have not been demonstrated to develop in the Green Belt. The release of a number of smaller Green Belt sites, spread around the borough, should be considered instead.

Highways, traffic, access

The existing road network is already overcapacity at peak times, including the A580, Mosley Common Road, Manchester Road, Walkden Road, Ellenbrook Road, Chaddock Lane, Hazelhurst Road, Moorside Road, Simpson Road, Newearth Road, Mort Lane, Leigh Road and Standfield Road. The Manchester North West Quadrant Study reports that roads in this area are some of the worst performing in the country. This proposal, together with the other proposed GMSF allocations and existing development commitments in the vicinity (Chaddock Lane, Garrett Hall, Astley Point, Burgess Farm, RHS site and Vicars Hall Lane) will significantly exacerbate this.

In the morning peak, most traffic from the area heads eastbound on the A580 to M60 J13. It regularly takes over 40 minutes to do this 3 mile journey. M60 Junction 14 is northbound only. Consequently, the A572 Leigh Road through Boothstown is severely congested with traffic travelling towards M60 Junction 13, which has a southbound access.

Other factors which worsen congestion in the area include:

- On-street parking on roads in Mosley Common and Tyldesley.
- The Mosley Common Road/A580 junction is narrow and results in vehicles queuing to turn right towards Liverpool blocking vehicles turning left towards Manchester.
- The prevalence of traffic accidents on the M60 Junctions 13, 14 and 15 on the M60 are too close together.

Traffic on the A580 has increased by 10% over the last 15 years according to the Department of Transport.

Significant road infrastructure improvements are required to address the severe traffic congestion in the area. However there are few opportunities to improve or widen the road network in Tyldesley, Mosley Common, Astley and Boothstown. Some improvements could be made by:

- An all-ways M60 Junction 14 would enable traffic travelling from Wigan Borough along the A580 to directly access the M60 southbound without needing to travel through Boothstown along Leigh Road.
- Restricting HGVs from using Leigh Road in Boothstown during peak hours, because the road is narrow around Arnfield Road.
- A new orbital motorway which connects the M56, M62, M61 and M66 would reduce traffic on the M60.
- An extension to the Metrolink from Eccles to Ellenbrook via the Roe Green Loop Line to connect with the Guided Busway. This route could also connect with Patricroft rail station for the rail link to Liverpool.
- A new link road from the A580 to the M62 to the west of Higher Green.

A traffic impact assessment is required to assess how the GMSF allocations and existing housing sites will affect traffic congestion in the area, including traffic from new development sites in St Helens.

The smart motorway along the M60 will not help to alleviate traffic congestion.

Transport for Greater Manchester's 2040 Vision needs to be aligned with the GMSF.

Public transport

Mosley Common is poorly served by public transport. It is not within walking distance of the Guided Busway or the nearest train stations at Atherton and Walkden.

The car parks at Atherton and Walkden stations are full and trains are full at peak times as they only have three or four carriages.

There are no public transport services to south Manchester (e.g. Trafford Park, Altrincham, Sale, Wythenshawe, Eccles and Salford Quays) and other areas, including Warrington where many local residents work.

The Guided Busway has not helped to alleviate traffic congestion in the area. It only serves people working in Manchester or along the East Lancashire Corridor between Leigh and Manchester.

Guided Busway services to Manchester are often full at Sale Lane in Tyldesley and are expensive.

The park and ride facility is always full resulting in many people parking on local roads. It is also difficult to access due to traffic congestion.

The traffic lights in Tyldesley town centre which prioritise Guided Busway services results in traffic congestion in the town centre.

A new Guided Busway stop will have little impact because buses are already full at Tyldesley and there is no capacity on the route to increase service provision.

Bus services to local hospitals have reduced.

It will be difficult to widen the A580 because the land adjacent to it is constrained by existing development.

Improving public transport options for the site will not reduce traffic congestion in the area because residents will still buy and use cars to make multiple trips e.g. school runs and shopping trips.

HS2 will not help the east of Wigan Borough.

Nature conservation

Loss of wildlife habitats for birds (including lapwings, kestrels, hawks and oyster catchers) toads, frogs, owls, foxes, birds, foxes, deer, badgers, hedgehogs, water voles, woodpeckers cuckoos, bats (a large majority roost in the tree behind 27 – 37 Bridgewater Road), minks and great crested newts.

Open space and recreation

The loss of open land used for recreation, e.g. walking; dog-walking; and horse riding.

Many recreation areas in the area have already been lost to new housing with very few accessible greenspaces left. Residents have to walk further to find green spaces and these are now under threat to housing.

The development will intensify the use of existing open spaces in the area including Whitehead Hall Meadow that local residents have worked hard to create and maintain.

Greenspace on the site should be maximised.

Schools, doctor surgeries and dentists

Local schools, GP surgeries and dentists are at full capacity and will not be able to accommodate demand from the site.

New schools, GP surgeries and dentist provision are not referred to in the policy, and there is no evidence presented which demonstrates that local facilities can accommodate increased demands.

Ground conditions

The site was previously mined for coal. There are numerous mine shafts, and the area is affected by subsidence, including properties on Commonside Road.

Flooding

Honksford Brook floods regularly. The brook should be protected from development.

Mort Lane frequently floods, and when it does, causes traffic congestion. This issue needs to be resolved.

The site is boggy in winter.

Development will affect the natural drainage of the site and will increase flood risk.

If more water enters Honksford Brook, Worsley Business Park and the properties next to Ellenor Brook between Hough Lane and Garrett Lane, could be put at a greater risk of flooding.

Retail and town centre facilities

Tyldesley, Mosley Common and Walkden are poorly served by local shops, services and jobs and so people travel elsewhere, which contributes to traffic congestion in the area.

The quality of shops in Tyldesley Town Centre is poor.

The GMSF should focus on improving and investing in Tyldesley Town Centre.

Poor engagement

The consultation period was too short and there was not enough publicity about it.

Many residents did not see the site notices and were only informed by the GMSF from other residents.

A letter should have been posted to all residents in the area.

There was a lack of detail on display at the drop-in sessions, including the existing housing sites e.g. Garrett Hall.

Air Quality

Air Quality in the area is poor, notably along the A580, M60, M61, Manchester Road, Chaddock Lane and Leigh Road, and will be made worse by the additional traffic created by development on this site; nearby GMSF allocations; and committed development sites.

An air quality assessment that considers the impact on air quality from the proposed developments should be undertaken.

Health

The cumulative effect of new development in the area on traffic, noise, air pollution, green space and urban sprawl will make Mosley Common an unpleasant area to live in and have a negative impact on people's wellbeing.

Other issues

Loss of farmland.

Planning obligations should be sought from the development towards public realm improvements and community groups in the local area.

More houses in the area will increase crime.

New homes should be sensitively designed to take account of Green Belt land and the character and beauty of the surrounding countryside and ecological networks. Not high density.

Loss of view across the fields.

Loss of privacy and amenity to existing properties adjacent to the site.

Loss of value of property adjacent to proposed site.

Maxilead Metals creates noise and air pollution.

Mistrust of landowners.

Concerns about fracking in the area.

Part of the site should be reserved for an extension to New Manchester Woodland Cemetery.

Developers and landowners

Maxilead Metals and Peel support the allocation, although Peel believe that a larger site should be allocated. Trustees of Dame Dorothy Leigh's Charity believe the allocation should be extended over their land. Small landowners concerned about impact on their residential properties. Persimmon Homes, Morris Homes and Bloor Homes believe safeguarded land should be used first before using Green Belt.

Other stakeholders

The Environment Agency believe the policy should be strengthened on flood risk, water quality issues and river features.

City of Trees and Lancashire Wildlife Trust made comments strengthening the green infrastructure on the site.

North Education Funding Agency referred to the need to consider the impact on school places.

United utilities advised that surface water should be disposed of in the most sustainable way.

[**ELR2 Cleworth Hall, Tyldesley**](#)

Who Responded

There were 92 submissions to this section. These were from 80 individuals, 7 couples or other family groups, no unknown people (name not supplied/illegible), no politicians, no developers/landowners, and one other organisation; the Environment Agency.

Summary of Issue(s) Raised

Housing need and supply

Developer profits over affordable housing.

More land has been identified in Wigan than the Objectively Assessed Housing Need figure. So less Green Belt land is needed for development.

30 dwellings per hectare (as applied in Wigan) is too low and is below the average density assumption applied across Greater Manchester. This means less land is required to meet housing needs.

The assumption in Wigan that only 75% of sites with planning permission will be available to build on is too low.

Wigan's housing need figure has not considered lower immigration as a result of Brexit.

There is already a considerable amount of housing being built and proposed in the area, including at Garratt Hall, in Astley and in Boothstown.

There is a substantial amount of existing housing for sale and rent in the local area and for a variety of house types and sizes.

The GMSF housing requirement is too high.

More houses are being built or are planned for in the east of the borough than the west of the borough.

The annual build out rates are not achievable.

Loss of Green Belt

Previously developed sites should be developed and vacant homes occupied before considering Green Belt sites. This will help regeneration and reduce the need for people to travel.

Low amenity employment sites such as scrap yards and recycling centres should be redeveloped for housing to reduce the need to build on Green Belt.

Proposals to release land from the Green Belt for development is contrary to Policy SP1 of the Wigan Local Plan Core Strategy which states that the extent of the Green Belt shall be maintained.

Highways, traffic and access

There is already severe congestion in the area which affects the roads through Tyldesley, Astley, Atherton, Boothstown and Walkden including Sale Lane, A580, A577 and the A572. There is insufficient capacity to accommodate the level of growth proposed on this site and other sites within the East Lancashire Road Corridor.

The severe existing congestion is partly caused by: narrow roads in Tyldesley including Manchester Road, Elliot Street, Mosley Common Road, Tyldesley Old Road, Simpson Road and Leigh Road; the narrow road junction at the corner of Mosley Common Road / A580 where vehicles queuing to turn right towards Liverpool block vehicles turning left towards Manchester; the one-way system in Tyldesley Town Centre (where vehicles need to stop to allow HGVs and buses to turn round corners); and the number of traffic lights in Tyldesley Town Centre that give priority to the Guided Busway.

At peak times, it can take over 90 minutes to travel from Tyldesley to Manchester via the A580.

Significant road infrastructure improvements are needed before any new development commences, which could include a Tyldesley Town Centre by-pass.

Cherington Drive, Wolford Drive, Peel Hall Avenue and Common Lane are narrow and at full capacity. They are unsuitable access points to the proposed allocation and are unable to accommodate the level of development proposed.

Public transport

The Guided Busway has not decreased traffic congestion around Tyldesley. It only accommodates people working in Manchester or along the East Lancashire Corridor between Leigh and Manchester. It does not help people working elsewhere including Trafford Park, Altrincham, Warrington, Sale, Wythenshawe, Eccles, and Salford Quays.

The Guided Busway is at full capacity at peak hours, including the park and ride facility. Passengers use town centre car parks instead.

Traffic congestion at peak hours effects bus journey times to Atherton Station from Tyldesley.

There are no buses from Tyldesley to other railway stations.

Proposed public transport improvements along the A580 should help people travelling westwards to the M60, M61 and M6, not just in an easterly direction towards Manchester City Centre.

Ground conditions

The site is unsuitable for housing due to its mining legacy. There are very deep mine shafts and land stability concerns. Local residents have experienced subsidence in the recent past

and are concerned that this will worsen. The site is also contaminated from previous mining activity and tar is still visible in places near Common Lane.

The site is steep and therefore unsuitable for development.

Nature conservation

Loss of woodland.

Loss of wildlife habitats including for owls, foxes, birds, foxes, deer, badgers, woodpeckers cuckoos, bats and great crested newts.

Open space and recreation

The loss of open space that is well used by walkers and for recreation. There is very little existing greenspace in Tyldesley.

Loss of a former coal mining site – the former Sod Hall and tar works are of historical significance and the site is a feature on an annual Tyldesley Heritage Trail.

Loss of public rights of way

The existing trees and footpath on the site behind Cherington Drive should be retained. The trees provide screening to existing residents.

Schools, doctors and surgeries

Local schools are oversubscribed and healthcare facilities are at capacity and cannot accommodate the needs of an additional 400 new homes.

The development should fund new school places.

Flooding

Flooding occurs at southern end of site behind New Lester Close.

Other infrastructure

Providing utility infrastructure to the site during construction will disrupt the local area.

Retail and town centre facilities

Shops and services in Tyldesley Town Centre are limited and cannot accommodate the needs of an additional 400 new homes.

There are no initiatives to build the business base in Tyldesley to capture passing trade from the Guided Busway.

Traffic congestion in Tyldesley Town Centre will deter people from shopping in the town centre.

Poor engagement

Not all local residents have been informed and have not received leaflets about it. Sites notices are not sufficient to inform local residents of the proposals.

At the drop-in sessions, the SHLAA sites were not shown on the maps that identified proposed GMSF allocations. Consequently, residents were not aware of the full extent of proposed housing in Tyldesley and the surrounding area.

Other issues

Impact on residential amenity if houses back up to existing homes.

Loss of view across the fields.

Loss of property values adjacent to proposed site.

Potential impact on adjacent allotments.

The site of the Roman Road from Wigan to Manchester lies underneath or adjacent to the site.

There are more suitable locations for new housing than Cleworth Hall which have better access to travel options and infrastructure.

Financial contributions should be sought from the developer of the site to enhance streets and parks in the local area.

More cars in the area will increase air pollution.

Stakeholders

The EA and City of Trees refer to the use of SUDS and maximising use of green infrastructure. Bloor Homes believe that safeguarded land should developed first instead of Green Belt.

[**ELR3 Pocket Nook, Lowton**](#)

Who Responded

There were 25 submissions to this section. These were from 17 individuals, 2 couples or other family groups, no unknown people (name not supplied/illegible), one politicians (Cllr Kath

Houlton), one developer/landowner (Morris Homes Northern Ltd.), and four other organisations:

- Environment Agency
- The Campaign to Protect Rural England, Friends of the Peak District & the NW Transport Roundtable (single submission).

Summary of Issue(s) Raised

Housing need and supply

The Wigan Local Plan Core Strategy limits the amount of development in Lowton, but the GMSF is proposing more development in the area.

Small windfall sites in Lowton should be used for retirement dwellings.

Employment land and supply

There is a too greater emphasis on attracting logistic developments to Wigan. There should be a better balance of businesses.

The provision of employment land along the M6 and East Lancs Road Corridors should be coordinated between Wigan Council, St. Helens Council and Warrington Borough Council, instead of the authorities competing against each other for investment.

Wages in the logistics industry are low.

Jobs created in the logistics industry will lost to automation in the future.

Empty business units should be used for new employment development.

Highways, traffic and access

The road network in Lowton is at overcapacity and struggles to cope during peak times, including:

- The A580 East Lancashire Road between Lane Head and the A579 Atherleigh Way and leading up to M6 Junction 23; and
- The A579 Atherleigh Way between the A580 and A572 St Helens Road.

Previous attempts to increase capacity on local roads have failed to resolve traffic congestion.

There has been very little investment in the road infrastructure in Lowton for many years.

Creating another junction on the A579 to access the site will increase traffic congestion.

The A580 should be a priority for transport investment because the M6 is close by.

Transport investment in the area should be co-ordinated between Wigan Council, St Helens Council and Warrington Borough Council.

Public transport

Lowton is poorly served by public transport.

There are no safe separated cycle lanes in the area.

Improvements to public transport should be made before any further development in the area commences.

Nature conservation

Loss of wildlife habitats on the site.

Open space and recreation

The ‘substantial landscape buffer’ should be shown on the allocation map.

Schools, doctor surgeries and dentists

Local schools, GP surgeries and dentists are at full capacity and will not be able to accommodate demand from the site.

Air quality and noise pollution

Air quality along the A580 is poor and will be made worse by the additional traffic created by development.

Industrial units on the site will create noise pollution affecting nearby residential properties.

Health

Increased air pollution will affect the health of local residents.

Loss of greenspace in the area will have a negative impact on people’s wellbeing.

Other issues

Loss of farmland.

The site name should be changed because it is a very large site.

Some landowners on the site are unwilling to sell their land for development and their land should be removed from the allocation.

Concerns that land will be compulsory purchased.

Object to building on SHLAA site – Barn Lane, Golborne.

Adjacent residential property will be blighted by the HS2 and business units on the site.

Developers, landowners and stakeholders

EA advise that there is a principal aquifer under the site which is highly sensitive to pollution. The allocation policy should refer to protecting Carr Brook and green infrastructure.

CPRE suggest that too much employment land is proposed in Wigan and that there are many brownfield sites that could be built on.

Natural England recommend that the site, and all other GMSF allocations, are screened for air pollution, recreation and water pollution impacts.

The owner of the majority of the site is unwilling to sell it for development.

[**ELR4 South Pennington**](#)

Who Responded

There were 161 submissions to this section. These were from 142 individuals, eight couples or other family groups, one unknown person (name not supplied/illegible), one politician, one developer/landowner (P Wilson & Co.), and four other organisations:

- Environment Agency
- The Campaign to Protect Rural England, Friends of the Peak District & The NW Transport Roundtable (single submission)

Summary of Issue(s) Raised

Housing need and supply

The housing requirement for Wigan and for Greater Manchester to 2035 is too high because:

- The Campaign to Protect Rural England estimates the housing requirement for Greater Manchester to be lower at 9,894 dwellings per annum and 197,885 over the plan period. This includes a 5% buffer and is within the range of past delivery.
- Lower immigration as a result of Brexit is not considered.
- The housing need is uplifted to encourage economic growth, which is not a true reflection of natural population growth.

The site is not needed for housing because:

- There is a considerable amount of existing housing for sale in Leigh.
- Previously developed sites in the urban area should be developed before considering the release of the Green Belt e.g. sites along Bridgewater Way, West of Bridge Street

and Butts Street. Wigan's Pilot Brownfield Register identifies 68 previously developed sites that could accommodate 7,362 homes.

- In October 2013 there were 1,773 long term empty houses in Wigan. These should be occupied before releasing Green Belt land for housing.
- The density assumption of 30 dwellings per hectare (as applied in Wigan) is too low and is below the average density assumption applied across Greater Manchester.
- The target of 70% of new homes that should be built on previously developed sites is too low, previously it was 80%-90%.
- The assumption applied in Wigan that 75% of plots without planning permission will be built on is too low.
- Wigan Borough can meet its own housing need from sites in the urban area, which equates to around 4/5 of the 22,500 new homes required by the GMSF.

New homes on the site will be unaffordable to most people as house prices in Pennington are high.

Loss of Green Belt

The Green Belt between Lowton and Leigh plays a significant role in separating the settlements and stops them from merging.

The proposed developments within the Green Belt at South of Pennington, Pocket Nook and around Haydock in St. Helens would merge Leigh, Lowton, Golborne and Haydock together, creating a large area of urban sprawl.

The proposed Green Belt gap between the site and the A579 Atherleigh Way is not wide enough to perform any of the functions of Green Belt and would be under pressure for development if an access road was built through it.

Releasing the site from the Green Belt is contrary to the NPPF and the Wigan Core Strategy, which states the Green Belt will remain unchanged.

The site performs strongly against all purposes of Green Belt, and exceptional circumstances have not been demonstrated to release the site from Green Belt

Releasing the site from Green Belt for development will be at the expense of redeveloping previously developed land and will not help urban regeneration.

Highways, traffic and access

The road network around Leigh and Pennington already suffers from severe congestion at peak times, in particular:

- The A580 East Lancashire Road between Lane Head and the A579 Atherleigh Way and leading up to M6 Junction 23. The A580 is one of the top 10 congested roads in the UK according to a recent study by INRIX.

- The A579 Atherleigh Way between the A580 and A572 St Helens Road.
- The A572 through Pennington making it difficult to access the housing estates in Pennington.
- Internal estate roads in Pennington including Beech Walk.
- Match days at Leigh Sports Village add to traffic congestion along the A580 and A579.

Given the existing congestion problems, the road network will not be able to accommodate the number of vehicles that the site would generate.

The proposed GMSF allocations at Pocket Nook, Astley Boothstown, Cleworth Hall and North of Mosley Common and the proposals to release land from Green Belt in St. Helens around Haydock will also increase traffic congestion on the A580.

A traffic impact assessment is required to assess how the GMSF allocations and existing development commitments (including those in St Helens) will affect the traffic congestion.

Creating another junction on the A579 to access the site would increase traffic congestion.

Beech Walk and Broadwell Drive are narrow estate roads and are unsuitable access points for the development.

Public transport

Leigh is poorly served by public transport. The nearest rail stations are in Wigan and Warrington, which are difficult to access due to road congestion and insufficient parking provision, and the bus services are unreliable and expensive.

Buses travelling towards Manchester on the Guided Busway are become full at Couling Lane and the park and ride facility is always full.

The Guided Busway has not helped to alleviate traffic congestion in the area. It only serves people working in Manchester or along the East Lancashire Corridor between Leigh and Manchester. Many people work elsewhere.

The provision of a rapid public transport system along the A580 before development commences cannot be guaranteed.

Nature conservation

The site is close to, and forms a link between, Pennington Flash Country Park and Hope Carr Nature Reserve which are important for wildlife habitats.

Loss of wildlife habitats on the site for bats, barn owls (breeding at Deans Farm), yellow hammer, linnet, tree sparrow, house sparrow, lapwing, woodcock, grey partridge, redwing, starling, song thrush, butterflies, water voles, kestrels, hawks, oyster catchers, toads, frogs,

owls, foxes, deer, badgers, hedgehogs, water voles, woodpeckers, great crested newts and cuckoos.

Open space and recreation

The site contains a number of footpaths and is well used for recreation. This recreation resource would be lost.

If footpaths were retained through the development, they would not be attractive to use.

Greenspaces are important for addressing climate change by storing carbon and preventing flooding.

The rugby club should not be relocated as it is part of the local community and is within walking distance of Pennington.

There are very few open space and recreation sites in Leigh.

Schools, doctor surgeries and dentists

Local schools, GP surgeries and dentists are at full capacity and will not be able to accommodate demand from the site.

New schools, GP surgeries and dentist provision are not referred to in the policy, and there is no evidence presented which demonstrates that local facilities can accommodate increased demands.

Flooding, drainage and water quality

There is a very high risk of groundwater flooding because the area is low lying, has a very high water table and clay soil makes drainage difficult. The site experienced major groundwater flooding in the 1960s. The gardens to the properties on Sydney Avenue, Donnington Close and Thames Avenue, adjacent to the site, are water logged after heavy rainfall. Development on the site will increase ground and surface water flooding on the site and in the surrounding area by affecting natural drainage and it would be difficult to mitigate.

Obtaining home insurance in this area can be difficult because of groundwater and surface water flooding. Some properties have experienced water underneath floorboards and have had to install pumps to remove it.

The rugby pitches on the site are regularly flooding and the drains and ditches are full of water.

The site is in a Groundwater Protection Zone as there are drinking water boreholes on the site. Development on the site could risk polluting the drinking water source.

Further detailed flood risk studies are required for the site.

The development would put a strain on Leigh Waste Water Treatment Works.

Retail and town centre facilities

Leigh has an oversupply of large supermarkets.

Poor engagement

The consultation period was too short and there was not enough publicity about it.

Many residents did not see the site notices and were only informed by the GMSF from other residents.

A letter should have been posted to all residents in the area.

Air Quality

Air Quality along the A580 is poor and will be made worse by the additional traffic created by development on the site.

The site is low lying and collects air pollution from the surrounding area on cold nights.

Wigan is one of 40 towns/cities in the UK which has very poor air quality according to a World Health Organisation report in May 2016.

Health

Increased air pollution will affect the health of local residents.

Loss of greenspace in the area will have a negative impact on people's wellbeing.

Other issues

Loss of farmland.

Planning obligations should be sought from the development

Loss of view across the fields.

Noisy construction activities should be restricted to certain hours of the day.

The development would put a strain on broadband provision which is already struggling.

The site is within the blast zone of Nobel Explosives' facility to the south of the A580 and planning applications for residential development in Culcheth, close to the facility, have been refused on this basis.

A major gas pipeline runs through the site.

The openness of the site makes a significant contribution to the character of the local area.

Developers and landowners

Some landowners in the allocation support the allocation and some do not.

Other stakeholders

The EA believe that the allocation policy should be strengthened around flood risk and green infrastructure and raise the issue of a groundwater source protection zone close to the site. City of Trees believe green infrastructure should be strengthened in the allocation policy.

[ELR5 Astley and Boothstown](#)

Who Responded

There were 197 submissions to this section. These were from 177 individuals, 14 couples or other family groups, no unknown people (name not supplied/illegible), one politician (Cllr Karen Garrido), one developers/landowners (Peel Group), and four other organisations:

- Environment Agency
- Historic England
- Residents Against Inappropriate Developments
- Worsley Civic Trust and Amenity Society

Summary of Issue(s) Raised

[Housing need and supply](#)

The housing requirement for Wigan and for Greater Manchester to 2035 is too high because:

The Campaign to Protect Rural England estimates the housing need to be lower.

The estimated growth in population from the 65+ age group is very uncertain.

Lower immigration as a result of Brexit is not considered.

Population projections are not always accurate e.g. para 2.20 of the GM Green Belt Assessment refers to inaccurate population projects made in the 1960s.

A disproportionately high number of homes are proposed in the east of the borough.

New homes on the site will be unaffordable to most people as house prices in Astley and Boothstown are very high. How many affordable homes will the site accommodate?

New houses on the site will be executive homes which will not serve local housing needs. The area needs 1 or 2 bed apartments or bungalows for people who are retired.

Less or no Green Belt land is needed to accommodate new housing because:

There is a considerable amount of housing already proposed and under construction in the east of the Wigan Borough and West of the City of Salford.

Previously developed sites should be developed and vacant properties occupied before considering Green Belt release.

The density assumption of 30 dwellings per hectare (as applied in Wigan) is too low and is below the average density assumption applied across Greater Manchester.

Neighbouring authorities should help deliver some of Greater Manchester's housing needs.

New homes are needed to meet the needs of a growing population, but the infrastructure in Astley, Boothstown, Tyldesley and Worsley is at full capacity and cannot accommodate more housing.

[*Loss of Green Belt*](#)

Releasing Green Belt for housing reduces the integrity of the remaining Green Belt to perform its functions.

The site will fill the gap between Astley and Boothstown, joining the two settlements together.

The site, other nearby GMSF allocations (Cleworth Hall, North of Mosley Common, East of Boothstown and Hazelhurst Farm) and large existing development sites (Chaddock Lane, Garrett Hall, Astley Point, Burgess Farm and Vicars Hall Lane) will cause urban sprawl and merge the settlements of Tyldesley, Astley, Boothstown, Walkden and Worsley.

The site will change the village character of Astley Green.

If the site is developed, it should retain a gap between Astley and Boothstown to keep these settlements separate. The site should be developed in a phased way.

Green Belt will be developed at the expense of previously developed sites in the urban which will remain vacant – developing Green Belt will harm urban regeneration.

Releasing large sites from the Green Belt is contrary to the NPPF. Small Green Belt sites, spread around the borough should be considered instead.

[*Highways, traffic, access*](#)

The roads in Astley, Boothstown, Walkden and Worsley are severely congested at peak times including the A580, Walkden Road, Ellenbrook Road, Chaddock Lane, Hazelhurst Road, Moorside Road, Simpson Road, Newearth Road and Standfield Road. The Manchester North West Quadrant Study reports that roads in this area are some of the worst performing in the country. According to the Department of Transport, traffic on the A580 has increased by 10% over the last 15 years. This proposal, together with the other proposed GMSF allocations and existing development commitments in the vicinity (Chaddock Lane, Garrett Hall, Astley Point, Burgess Farm, RHS site and Vicars Hall Lane) will significantly exacerbate this.

In the morning peak, most traffic from the area heads eastbound on the A580 to M60 J13. It regularly takes over 30 minutes to do this 2-mile journey.

M60 Junction 14 is northbound only. Consequently, the A572 Leigh Road through Boothstown is severely congested with traffic travelling towards M60 Junction 13, which has a southbound access.

Other factors which impact on congestion in the area include:

There are few points for traffic to cross the Manchester Ship Canal to travel to south Manchester.

Traffic accidents on the M60 significantly increase traffic congestion on the A580 and Leigh Road.

Significant road infrastructure improvements are required to address traffic congestion in the area including:

An all-ways M60 Junction 14 would enable traffic travelling from Wigan Borough along the A580 to directly access the M60 southbound without needing to travel through Boothstown along Leigh Road.

Restricting HGVs from using Leigh Road in Boothstown during peak hours, because the road is narrow around Arnfield Road.

A new orbital motorway which connects the M56, M62, M61 and M66 would reduce traffic on the M60.

Higher Green Lane is used by HGVs. If this road is used to gain access to the site, it will become severely congested.

Severe traffic congestion in the area will make new homes on the site unattractive to buyers.

The smart motorway along the M60 will not help to alleviate traffic congestion.

The GMSF should direct new development to areas of Greater Manchester where there is sufficient road infrastructure capacity to accommodate growth and additional traffic.

The policy does not refer to the severe traffic congestion in this part of Greater Manchester.

From which roads will traffic access the site?

Public transport

The site is poorly served by public transport. It is not within walking distance of the Guided Busway or the nearest train stations at Atherton and Walkden. The car parks at these stations are full and trains are full at peak hours.

There are no public transport services to south Manchester (e.g. Trafford Park, Altrincham, Sale, Wythenshawe, Eccles and Salford Quays) where many local residents work.

The Guided Busway has not helped to alleviate traffic congestion in the area. It only serves people working in Manchester or along the East Lancashire Corridor between Leigh and Manchester.

Guided Busway services to Manchester are often full at Sale Lane in Tyldesley and are expensive.

The park and ride facility is always full resulting in many people parking on local roads. It is also difficult to access due to traffic congestion.

There are no dedicated bus lanes for the Guided Busway along the busiest stretches of the route.

The number and frequency of local bus services through Astley and Boothstown reduced when the Guided Busway opened.

The policy provides no details about the rapid public transport system along the A580 and its impact on alleviating traffic congestion.

The canal towpath improvements and cycleways referred to in the policy should be committed before development commences.

The Metrolink should be extended along the A580 to Leigh or to Monton and then along the Roe Green Loop Line.

An orbital bus and Metrolink route that mirrors the M60 should be provided.

Improving public transport options for the site will not reduce traffic congestion in the area because residents will still buy and use cars to make trips e.g. school runs.

Nature conservation

Increased air pollution resulting from additional traffic will impact negatively on the Manchester Mosses Special Area of Conservation and Whitehead Hall Meadow SBI.

Loss of wildlife habitats including for owls, foxes, birds, foxes, deer, badgers, woodpeckers cuckoos, bats, minks and great crested newts.

Open space and recreation

Loss of land used for recreation e.g. walking, dog-walking, horse riding.

The site should provide leisure facilities and access to the countryside. Greenspace on the site should be maximised.

The development will intensify the use of existing open spaces in the area including Whitehead Hall Meadow that local residents have worked hard to create and maintain.

Will the recreation ground, equipped play area, scout and guide buildings on Ellesmere Street be lost?

There is little green space and play facilities in the area.

Developing up to the Bridgewater Canal will have a negative impact on the character of the area.

Schools, doctors' surgeries and dentists

Local schools, GP surgeries and dentists are at full capacity and will not be able to accommodate demand from the site, including Leigh Walk-in Centre and Wigan Hospital.

New schools, GP surgeries and dentist provision are not referred to in the policy, and there is no evidence presented which demonstrates that local facilities can accommodate increased demands. Will new facilities be built on site or will existing facilities be extended, or both?

How will new schools, surgeries and dentists be funded when the Government are cutting funding to these services?

Flooding

Development will affect the natural drainage on the site and will increase the risk of flooding.

There are flooding and drainage issues towards the east of the site.

Managing drainage and flood risk on the site will affect the hydrology of the area and in particular the wetland habitat of Whitehead Hall Meadow.

Retail and town centre facilities

The site is not within walking distance of local shops and services and so people travel elsewhere.

The GMSF should focus on improving Tyldesley Town Centre, which is a poor centre with a poor quality of shops.

Boothstown Local Centre is crowded and the parking facilities are full.

Shopping and community facilities should be provided on the site.

Poor engagement

The consultation period was too short and there was not enough publicity about it.

There was a lack of detail on display at the drop-in sessions, including the existing housing sites.

The letter to Boothstown residents from the Mayor of Salford about the draft GMSF allocations should have been sent earlier than January 2017.

Public engagement on this allocation needs to be more consistent between Wigan Council and Salford City Council.

Air Quality

Air quality in this part of Salford fails national standards and more development will make it worse.

Ground conditions

It is a former coal mining area, which may affect the suitability and deliverability of the site for housing.

Heritage

Astley is a historic mining village. The development will change the historic character of the village forever.

Housing on the site will have a negative impact on the Astley Green Colliery Engine House and headgear, which are Scheduled Ancient Monuments.

There are WWII remains around Boothstown.

Health

Impact on wellbeing from urban stresses – air pollution, high density development, less green and open spaces, traffic congestion, noise, crime, more people in an area.

Other issues

Loss of farmland.

Construction work on the site has commenced.

New houses should be located in areas and built in a way to support a low carbon future.

Planning obligations should be sought from the development towards public realm improvements in the local area.

New housing on the site will put pressure on bin collection services which have already been reduced.

More houses in the area will increase crime.

New houses should be built sympathetically to the area and existing dwellings.

Loss of view across the fields.

Loss of value of property adjacent to proposed site.

Developers, landowners and stakeholders

Peel support the allocation. The EA suggest additional allocation policy wording on SUDS, green infrastructure and protecting and enhancing Stirrup Brook and Whitehead Brook on the site. UU state that there are water mains on the site and that the disposal of surface water should be considered in the most sustainable way.

M61 Corridor

Who Responded

There were 30 submissions to this section. These were from 22 individuals, 1 couples or other family groups, 1 unknown people (name not supplied/illegible), two political organisations (Saddleworth Parish Council, Westhoughton Liberal Democrats), one landowner/developer (Harworth Estates), and two other organisations: Friends of the Earth, and Natural England.

Summary of Issue(s) Raised

Consideration should be given to the other routes surrounding the proposals, particularly the road networks into Bolton town centre from the M61 junction 5 as well as to how best to manage traffic entering the road network from existing housing estates which is already difficult at peak times.

The current infrastructure in the area cannot support this development.

Concern that site allocations coming forward along the M61 Corridor may compromise ecological networks operating spatially between designated sites, which could potentially lead to a further fragmentation of habitat and species.

Objection to building a new road across the Green Belt. Can see merit in the mixed-use nature of the scheme, but how sustainable the mixed use community in this location would be is questionable.

This location includes a number of designated heritage assets. Development therefore may affect these heritage assets and their settings. The allocation does not appear to have been informed by any assessment of effects upon the historic environment, so the GMSF cannot demonstrate that the principle of development and the quantum (numbers) can be achieved on the site without harm to

the historic environment.

Uncertainty over delivery in Westhoughton where this requires major highways infrastructure crossing local authority boundaries.

The proposed link road will provide direct connections from junction 5 of the M61, through to the M6 and M58 helping to better integrate the M61 corridor with the western side of GM.

The new road link will enable traffic to reach the M6 without having to pass through Shevington and is supported (by some)>

[M61C1 Junction 6 \(Bolton\)](#)

Who Responded

There were 81 submissions to this section. These were from 67 individuals, 6 couples or other family groups, no unknown people (name not supplied/illegible), no politicians, two developers/landowners (David & Patricia Johnson, and Mr Pravin Parmar), and one other organisation; the Environment Agency.

Summary of Issue(s) Raised

A large proportion commented on traffic congestion, road infrastructure, and broader social infrastructure concerns. Related pollution (air, noise, CO₂) concerns were mentioned in several cases; one person commented on the negative effect of traffic on active travel (cycling, walking).

Respondents questioned the requirements for industrial development, variously arguing that:

- There are vacant premises and that allocation should be brownfield first;
- Distribution of industrial provision across the borough/GM was uneven and there were better locations;
- Brexit had/would reduce the demand; or
- There was a need, per NPPF, to demonstrate why existing development management policies were not adequate without the allocation.

Lancashire Bat Group recommended brownfield register to identify under-used sites for housing, with live updates (GIS); an independent review of housing needs (also suggested by some individuals); and an ecology review to assess impacts and produce a mitigation plan.

Lancs Wildlife Trust (LWT) called for safeguards: compensation for replacements of habitats where retention is demonstrably not practicable, the retention and enhancement of pondscapes, and provision for sufficient habitat for breeding amphibians. SBI protection is welcome, but LWT is not sure how this could be achieved.

The removal of greenbelt attracted a range of comments that relate to the loss of green space amenity: loss of recreational space, peace and quiet (around half), and wildlife habitat

Some comments referred to adverse impacts on landscape, the character of settlements, loss of heritage, and conflict with the local plan in terms of character assessment.

One comment called for a freeze on green belt development for 10 years to give a chance to re-appraise use of green belt. Another comment described the use of green belt as hollowing out the town centres.

The Environment Agency referred to a lack of environmental policies.

City of Trees called for Green Infrastructure and SUDS to be included in any development, and woodland should be extended to manage air and noise pollution from major highways and railways.

United Utilities noted the existence of several high pressure mains through the area and UU easements that require consideration. Surface water disposal requires consideration in line with other comments on flooding.

Some responses referred to the five purposes of green belt (per NPPF) and relate objections to the loss of the benefits described.

Some suggested an increased risk of flooding through run-off and the lack of attenuation of surface water in a location prone to surface water in its natural state.

Some people referred to health and quality of life – often in conjunction with other issues above (such as traffic and/or loss of green space).

Several respondents objected to themes of democracy:

- Undemocratic process;
- Lack of information, consultation and transparency;
- An example of councils doing what they want;
- Commercial interests (where would profit go... would it be re-invested in the community?)
- One comment stated that the Cutacre/Logistics North development went against the original condition to restore the mining area to its original condition.

Other comments referred to various economic harms – to agriculture, tourism, house values (loss of views/peace), with no benefit to the residents affected. There was some concern in a few comments about a lack of affordable housing, and suspicion that the housing would be

larger, executive homes. One comment suggested the process of removing green belt disadvantaged the wealthy (through loss of countryside) and the poor (with jobs moving outwards away from residential areas).

3 comments proposed sites for development that are not included in the area.

2 comments were positive in their opinion, including reference to the need for housing:

Haworth Estates supported the size and shape of the Wingates proposal, stating the limits of Logistics North and the available infrastructure at Wingates. The response also recommended an additional 3 parcels of land nearby.

One comment said, “all social value suggestions within the frameworks must be assigned to improving the Westhoughton area and not taken by the larger area of Bolton...”.

[M61C2 Hulton Park and Chequerbent](#)

Who Responded

There were 1931 submissions to this section. These were from 1731 individuals, 68 couples or other family groups, four unknown people (name not supplied/illegible).

There were three responses from politicians:

- Councillor Ryan Battersby
- Councillor Zoe Kirk Robinson
- Yasmin Qureshi MP

There were three responses from developers/landowners:

- Exors F Lythgoe
- NolanRedshaw
- Peel Group

There were seven responses from other organisations:

- Environment Agency
- Friends of the Earth
- Heart Hulton Estate Area Residents Together
- Historic England
- The Campaign to Protect Rural England, Friends of the Peak District & the NW Transport Roundtable (single submission).

Summary of Issue(s) Raised

This summary aims to identify all the issues raised by respondents; it is not an individual reply to each response. If a respondent feels that they have raised a valid issue that has not been recognised, there will be a subsequent consultation during which opportunity to highlight that issue.

Recurring issues:

Road and social infrastructure; loss of green space and environmental harm; excessive scale of development and need to find brownfield land elsewhere; concerns over lack of policy support, and issues of political transparency/interests.

A prepared letter has been submitted by several hundred respondents. The principle issues raised have been summarised as:

- Green belt has 5 stated purposes and should not be released unless no other land is available to accommodate further needs. Such green belt land that is released should be that with weak performance against the stated 5 purposes.
- The letter asserts that safeguarded land (for housing) is readily identified and will accommodate future housing needs (per para 85, NPPF), yet have been ignored in the Draft GMSF. Safeguarded land will identify long term housing needs; and new green belt boundaries must have regard for the permanence of boundaries beyond the life of a local plan (per NPPF).
- The Hulton Park estate does not need to be released, since a golf course is compatible within the green belt. Proposals for inappropriate secondary use (notably housing) should require evidence of special circumstances, and should not result in the wholesale release of green belt.
- The Hulton Park estate, given its historic (Grade II listed parkland) nature, contributes significantly to the openness of the location.
- A number of policies in the Draft GMSF, the Bolton Allocations Plan and the Core Strategy set out protection of green belt and the release of small pockets of green belt (at Cutacre), ensuring the restriction of development that affects the openness of green belt.

Other issues raised in relation to this proposed allocation are summarised as follows (including additional comments raised by some 'pro forma' respondents):

Road network:

Existing traffic is already a major problem, especially for peak periods, but also at other times of the day.

Traffic congestion in Westhoughton has got worse over 20 years. Council seems unable/unwilling to solve the problem. "If it does not affect Bolton Town Centre, then it is insignificant."

Concern that there is no provision for improvements of the road network to accommodate extra residential or commercial traffic.

Concerns about road safety, including some mentions of the impact on vulnerable road users (such as pedestrians, children, cyclists), and an impact (through increased risk) on insurance premiums.

Parking issues around focal points such as railway stations and schools, as well as the congestion/safety issues there.

Pressure on public transport, notably rail.

Transport infrastructure issues linked in with concerns about pollution – air quality, CO2 and noise, although these are separate issues that cover industrial uses and construction causes, too.

There was concern that a Westhoughton bypass was necessary, but unlikely to be publicly or privately funded, and that a Leigh Road/Park Road bypass would convey traffic problems to Chequerbent.

One respondent was unhappy about development on the Green Belt, but welcomed the idea of a new bypass (promised many years ago). Another said that a bypass/M61 link should be built before development of the area.

Highways England notes the need for a M61 link at j5, which already experiences congestion and blocking back at peak periods. Detail needed.

Social infrastructure:

Comments about existing and increasing future pressure on social infrastructure, e.g. medical services (GPs, hospital, pharmacies), schools, and local shops.

Metal Box development - "I thought that a new health centre was to be built on the estate, well that didn't materialise"

Concern at proposal to develop western edge of Hulton Park, away from services.

More houses = more council tax, but also creates costs in more social needs/services - needs to be offset against servicing an increasing population.

United Utilities [UU] highlighted: "Several large pressurised water mains and sewers cut through the site. Also there are existing UU easements which will need to be considered. Consideration must be given to disposal of surface water in the most sustainable way."

Brownfield first; challenging the need; extent of development

Variations on the idea of focusing on brownfield land first or instead. Developers prefer building on Greenfield - first duty to shareholders, not the public; they should be required to reveal 'land bank' with planning permission.

Some comments imply that the available unused, underused or derelict premises (including mentions of particular commercial units and/or mills) are sufficient to meet the needs of required development. Reference to old buildings/mills in Manchester and Salford Quays.

Some challenged the need for housing on the basis of numbers of houses for sale (and therefore surplus). The housing analysis and need for housing was questioned.

Brexit was mentioned as a challenge to the need for housing in the area.

Some references to land banking being a problem that artificially limits the availability of brownfield land.

Reference to existing employment sites (such as Cutacre/Logistics North) already being extended. Also that the distribution of allocations is unfair, with too much from this location.

A suggestion that economic circumstances will lead to more public/quasi-public land will be released (health, education, water, rail) which will require less infrastructure support than green sites.

A response from a planning agency included projections of school places, asserting under occupancy of existing facilities.

Green Belt

There was concern that the 5 stated purposes of Green Belt [NPPF para 80] were being neglected by removing land from the green belt, and that green belt is, or should be, untouchable.

Some of those comments referred to Hulton Park's "strong" performance as a green belt area.

Comments expressed concern that there was already sufficient (or too much) development in this area, that further allocation was excessive, and that Westhoughton had 'done its duty' ("more than doubling its population in the last 50 years"). In some responses, this was linked to the green belt purpose of preventing merging of neighbouring towns. One comment noted that 60% of proposed new build on green open space in Bolton is in the Westhoughton area, and that proposals should be more evenly spread.

A few comments suggested that open protected Land, or weaker-scoring green belt should be targeted first.

It was not a proper approach to identify sites through proper green belt review and sequential process.

Why have smaller pockets of land proposed by developers been ignored in favour of large chunks of green belt.

Environmental concerns

A range of environmental concerns expressed, including:

- Most significantly, concerns about the loss of the availability of green space, green infrastructure, woodland, play areas, recreation/events amenity.
- Impacts on landscape (described as rare high quality for the area), visual amenity, and town character.
- Impacts on historical/archaeological assets, including Hulton Park and Pretoria Pit Memorial.
- Loss of or threat to land such as SBI (land of special biological interest), SSSI (sites of special scientific interest), local nature reserves. Some comments included proposals/provisos that there should be studies of these with a view to protection areas.
- Loss of farmland (relating to issues such as landscape, rural economy, and food security/food miles)
- Greater Manchester has stated a ‘tree per GM resident’ goal, so why are areas being selected where trees will be destroyed?
- Risk of flooding, both direct risks to development in water-logged land and the increased risk of run-off in the wider area.

A couple of responses made reference to the protection of mineral reserves, pointing out that the area is a mineral safeguarding area for brick and clay, sand and gravel.

Recommendations: wildlife infrastructure survey; buffering around SBIs & wildlife corridors; Westhoughton bypass route protected (including green buffering). “Green Belt is our ‘rain forest’.”

The Environment Agency supported references to SUDS (Sustainable Drainage Systems), and recommended adding wording to favour ‘green’ SUDS solutions over engineered solutions. It said that flood risk advice was currently being reviewed, and that it should be incorporated into updated policy. It stated a need for large amounts of GI, landscaping, retention of habitats, enhancement of LNRs & wildlife corridors; regard to Water Framework Directive with specific references to protection and enhancement of key assets on this location, including naturalisation of water courses (notably Chanters Brook).

Natural England draws attention to the need to make reference to New Park Wood ancient woodland, with reference to protected species per standard NE advice. New Park Wood also identified by Woodland Trust (WT) as affected. WT recommends buffer of 15m between ancient woodland and development.

Lancashire Wildlife Trust (LWT): large green infrastructure area within allocation is at risk. Hulton Park SBI at risk directly and through isolation from surrounding ecological network. Leisure development could be positive, negative or neutral for SBI. Some proposals to add to positive policy wording: if retention of habitat is not practicable, replacement of at least equivalent value must be provided, integrated with ecological network; to be continually and appropriately managed. Lack of analysis/evidence makes comment difficult.

City of Trees advised that point 1 (under M61C2) should specify high quality green infrastructure; point 6 should include tree planting to assist with air & noise pollution; point 9 should specifying greening routes to and from the area.

Policy concerns

References were made to the Bolton Core Strategy (local plan) proscribes development in the green belt. Some comments went into further detail on specific policies in the Core Strategy limiting development in specific areas (notably Hulton Park and Westhoughton) or themes of protecting types of land, and arguing that the proposals contradict these policies. Other comments were made that the proposals contradict national (NPPF) policy, along the lines already mentioned above.

Democracy concerns

Some responses expressed concern about the [perceived] lack of democracy in the consultation processes while making other comments, including: lack of consultation (e.g. weren't aware of it; short time to present comments, especially approaching Christmas); lack of transparency about the process; difficulty accessing the portal; allocations in the draft that were against local opinion; people affected are not involved or considered in the decision; loss of trust; doubt regarding promises made.

Some suggestions were made that the consultation should have been posted to every home in Greater Manchester. The GM Mayor's involvement should be compulsory.

Several comments addressed the motives for the allocations, including an increase in council tax income; the interests of developers, and whether the council was in thrall to developers. "...it seems that large companies can buy anything at a price"; it is a developers' charter.

Concerns that golf course proposals were in some way a stalking horse for more housing, asserting undue influence on GMCA. "If sufficient funds were not forthcoming they'd just put in plans for further housing projects and completely obliterate the green space. No-one is fooled by the golf course plan."

Comment was made that Peel was holding a publicity event while councillors and planners were saying they knew nothing about the Hulton Park plans.

Concerns that promises for Cutacre Country Park have been reneged, and that there isn't a country park in the area; other road/social/green infrastructure previously promised but not delivered.

CPRE: "It is very important that the GMSF should not become a vehicle for overturning local decision making, and that local councillors are able to exercise their democratic roles"

Doubt that developers will provide social infrastructure because developers don't accept that they should.

Some comments included calls for the planning authority(s) to take control from developers, require them to build sustainable housing.

In conjunction with critical comments on these subjects, many responses were critical of planners and/or 'the council', variously referring to competence, awareness of local issues & public feeling, vested interests.

Social concerns

Fears of:

Erosion of neighbourhoods as a result of increasing populations. Increased social problems, such as crime.

Consequence of impacts (e.g. increased population, congestion, loss of green space, etc.) on health and overall quality of life.

Rich disadvantaged: destruction of countryside; poor disadvantaged: jobs moved further away

Historical Impact: The campaign letter, Historic England (H.E.) and others refer to the Gr2 listed historic park, noting that the NPPF states that substantial harm/loss of Gr2 listed assets should be exceptional. H.E. said that there did not appear to have been an assessment of the impact in accordance with NPPF and H.E.'s advice notes.

Housing policy

Comments referred to a lack of affordable housing on one hand, too much social housing on the other. Concern that the focus would be on larger (3-4 bed housing) rather than improving the existing terraced stock for 1st time buyers & young families.

Alternative approaches: focus on employment and smart apartments in Bolton town centre and suitable housing near employment centres (reducing commuting; providing market base for town centre businesses); improve existing terraced housing stock.

One comment stated that, with 27,000 existing unfit homes, building on the green belt will not improve deprivation.

If Peel wants a golf course, let them build it without the housing.

Recent opposition to 300 houses was successful: now they are opposing 2,900 houses plus a golf course.

"When Roscoe's Farm was approved to build 106 houses on other protected open space in Westhoughton it was on the understanding by the residents from the Leader of Bolton Council that this would protect green space all around the outskirts of Westhoughton and this is now not the case with these proposals."

A developer (TW) commented that the housing numbers for the allocation are not realistically deliverable within the timescale defined because of highways considerations, an additional 3 years being more realistic.

Economic concerns

Lack of local economic benefit, or local economic harm. Lack of economic investment where it's needed, or for those adversely affected by the development.

Loss of house value for houses affected by further development. Increase in council tax.

One comment that improving the local economy is more important than housing (in context of concerns about housing without investment in local infrastructure).

One comment indicated that the Hulton Park & Chequerbent site has been considered previously and previously failed because of unviability.

Support

A few respondents were supportive of the draft proposals. One comment agreed with the need for housing and suggested that opposition was because people did not want development near them, while also encouraging planners to find lower-impact areas in green belt and brown belt areas.

Provisos (not necessarily opposed to, or in agreement with, development)

Some comments recommended conditions that should be associated with the proposals:

- All development should have access to public transport and cycling routes
- Developers should be required to provide green space between developments, retaining walking space (see above)

- Infrastructure (road, social) surveys &/or improvement should be conducted before any development is done

Some respondents prefaced their site-based objections with recognising the need for further allocation overall. Suggestions included: smaller pockets rather than large green belt areas.

Notable Responses; Other Comments

Some respondents stated their opposition to the draft plan, often demonstrating considerable conviction, without offering specific reasons.

Little Hulton councillors responded with a proposal for Brackley Golf Club, supporting its use (following their survey of residents) for housing, with provisos, including support for improved sports facilities, access by car not to impact quality of life adversely and not be through Captainfold, avoiding negative impact by development on infrastructure.

Councillors noted lower car ownership in Little Hulton but poorer public transport links.

A local councillor stated a need for a robust housing policy for Westhoughton, and covered a range of issues regarding housing needs, public opinion, infrastructure (particular references to: Westhoughton, Chew Moor, Roscoe's Farm, Market St, Bolton Rd; and to power, water and sewage), public services, schools, ecology, and archaeology. These comments match issues already summarised.

The allocation should consider the impacts of development nearby, such as Hindley, Hindley Green and Atherton.

With reference to the Hulton Park golf course proposal, comment that there is no identifiable need for a golf course.

Comments included objections that sites owned by them were not included in the allocations.

A 'Pro Forma' letter was received, as follows:

GM SPATIAL FRAMEWORK

OBJECTION TO PROPOSED GREEN BELT DELETION

SITE BT55 HULTON PARK, BOLTON

This parcel is described in the GMSF Draft Consultation document as;

"Located on the western urban edge of Over Hulton and the northern urban edge of Atherton, in the south of the Bolton Borough area. It is a relatively large parcel containing gently undulating land. The majority of the

land cover comprises the woodland and landscaped areas of Hulton Park. Areas to the west are located outside the park and are composed of moderately sized fields of pastoral and arable land contained by hedgerows, belts of mature trees and blocks of woodland.

Our objections to the draft proposals regarding this site are as follows;

The objection site is confirmed in the LUC Green Belt Assessment prepared alongside the GMSF Consultation Draft as having strong ratings when assessed against each of the 5 purposes of green belt. The report confirms that green belt should not be released unless there is no other land available to accommodate future development needs. Where green belt releases are required these should be directed at sites where ratings against the 5 purposes are weak.

The site comprises a Grade II Listed Park across most of its extent. This historic parkland contributes significantly to openness in this location.

There is sufficient land elsewhere within Bolton outside green belt and recently identified as Safeguarded Land in the Bolton Allocations Plan for future Housing development needs. In line with recent guidance in para 85 of the NPPF these allocations will accommodate future housing and other development needs. These Safeguarded areas are in suitable Housing Market Areas across the borough but have been ignored in the GMSF Draft Plan. Safeguarded Land at Wingates, a short distance from the site, should be considered first for local development requirements.

The owners of the site have confirmed proposals for primary use of the site as a quality leisure use - a golf course - which is a recreation use often considered appropriate to green belt. They propose submission of a planning application in late 2016. On this basis there is no need to release this site from this Strategic Green Belt Area to accommodate this use. Submissions from the site owners to the winter 2015 Call for Sites consultation confirm;

- a. *Land east of the disused railway line/mature woodland including Hulton Park: This plot will*

consist of a high quality leisure destination and heritage restoration project, with peripheral residential development.

Any proposals for limited, inappropriate, secondary uses such as Housing alongside the open golf course leisure use at the site should be supported with Very Special Circumstances being shown by the site owners. An overall release of the site from green belt is unnecessary and prejudicial to the long term benefits of this site in spatial terms as part of a Strategic Green Belt area

In support of these objections it is noted that the GMSF Draft Consultation confirms the following Policies relating to Green Belt in Bolton:

The need to protect or maintain the existing Green Belt boundaries in the Borough is supported through Policies RA1 (Inner Bolton), RA3 (Breightmet), OA1 Horwich and Blackrod), OA3 (Westhoughton), OA5 (North Bolton), and OA6 (Little Lever and Kearsley).

Policy OA4 (West Bolton) supports the maintenance of current Green Belt boundaries in West Bolton apart from around Cutacre, where a boundary adjustment to allow economic development is to be considered.

Bolton's Allocations Plan sets out how the Core Strategy will be implemented and contains a number of policies to support this implementation. The Allocations Plan was adopted in December 2014. It proposes the deletion of some Green Belt land around Cutacre to allow for employment development in line with the Core Strategy and also the addition of a smaller area of land within Bolton to be added to the Green Belt. Extensive areas of Safeguarded Land are identified in the recent Bolton Allocations Plan.

Policy CG7AP of the Allocations Plan provides the Council's stance on Green Belt land, preventing development in these areas which "does not maintain the openness of land or which conflicts with the purposes of including land within the Green Belt" with a limited number of exceptions. Limited infilling is to be permitted in villages at Hart Common and Scot Lane End.

Paragraph 85 of the NPPF confirms that Local Planning Authorities may wish to identify areas of 'safeguarded land' between the urban area and the Green Belt to accommodate long-term development needs well beyond the plan period. New boundaries must have regard for the permanence of the designation by redefining boundaries which endure beyond the Local Plan period.

[M61C3 West of Westhoughton](#)

Who Responded

There were 121 submissions to this section. These were from 108 individuals, two couples or other family groups, one unknown person (name not supplied/illegible), no politicians, three developers/landowners (Jones Homes (NW) Ltd., P Wilson & Co., Westhoughton Golf Club (opposed to development), and two other organisations: the Environment Agency, and Historic England.

Summary of Issue(s) Raised

Support

Three consultees support the proposed allocation, with two of these stating they are looking at buying one of these properties as a first time home.

Number of consultees raising the issue: 3

Deliverability/timescale

On the basis that there are no significant infrastructure requirements associated with delivery of the site, following the adjustment to the lead-in time and delivery rates it is anticipated that all 1,000 dwellings proposed at this site could reasonably be completed within the plan period.

Number of consultees raising the issue: 1

Housing

There is not a housing shortage in Westhoughton, there are plenty of affordable and empty homes.

Number of consultees raising the issue: 7

The development proposed appears to be aimed at the upper end of the market with houses of 4/5 bedrooms being the "norm", this is not likely to attract the needy. There will be no low profit affordable housing.

Number of consultees raising the issue: 4

There will not be a mixture of houses to create communities.

Number of consultees raising the issue: 1

Infrastructure (General)

Westhoughton has grown out of recognition with the undelivered promise of infrastructure development and local amenities. Westhoughton has no proper infrastructure. If the infrastructure doesn't support the plans, the GMSF shouldn't be given approval.

Any further development in or around the Westhoughton area without the requisite infrastructure improvements will be disastrous. With public services in Westhoughton already stretched, I see no way of justifying further housing expansion on the scale proposed by the GMSF without significant investment in public services.

Number of consultees raising the issue: 28

Infrastructure (Health)

GP's Surgery's

It is difficult to make a GP appointment. GP surgery capacity is already at or below the level where they can cope with the current number of residents in the area. They would struggle to cope with the additional demand. 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.

The house building will affect demand for doctors. Westhoughton has grown out of recognition with the undelivered promise of GP surgeries.

Where and how many GP surgeries are proposed?

Number of consultees raising the issue: 68

Medical Facilities/Health Provision Generally

Medical facilities are overloaded. Health facilities would struggle to cope with additional demand.

Number of consultees raising the issue: 10

Medical Centre

Westhoughton doesn't have a medical centre.

Number of consultees raising the issue: 2

Hospital

The hospital, including accident and emergency, is struggling to cope. There are a lack of local hospital beds.

Number of consultees raising the issue: 8

Dentists

The house building will affect demand for dentists. Dentist availability is already at or below the level where they can cope with the current number of residents in the area.

Where and how many dental surgeries are proposed?

Number of consultees raising the issue: 32

Care Homes

Care Homes?

Number of consultees raising the issue: 1

Infrastructure (local shops)

There are insufficient local shops for existing houses. There is a need to ensure there are sufficient shops.

Number of consultees raising the issue: 5

Infrastructure (schools)

The house building will affect demand for schools. Schools are already overcrowded and at breaking point. Class sizes are too large. Local schools are unable to cope with an increase in local children.

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.

The increased need for school places caused by the GMSF would require a number of new schools to be built.

How many new schools are proposed and where will they be sited?

Number of consultees raising the issue: 64

Infrastructure (Nursery's)

There needs to be enough nursery places.

Number of consultees raising the issue: 2

Infrastructure (Police Stations)

We used to have several police stations in the vicinity – they have all disappeared now. There is a lack of police in the area. Police coverage is already at or below the level where they can cope with the current number of residents in the area. The police service in the area will be harmed by the proposal in the GMSF.

Number of consultees raising the issue: 5

Infrastructure (Emergency Services)

We don't get a great deal of support from the emergency services as it is.

Number of consultees raising issue: 1

Infrastructure (ambulance)

The ambulance service in the area will be harmed by the proposals in the GMSF.

Number of consultees raising the issue: 1

Infrastructure (fire and rescue service)

The Fire and Rescue Service is already at or below the level where they can cope with the current number of residents in the area. The fire service in the area will be harmed by the proposals in the GMSF.

Number of consultees raising the issue: 2

Infrastructure (leisure)

Children are bored because of the lack of things for them to do.

Number of consultees raising issue: 2

There is no mention of leisure provision. There is a need to ensure there are sufficient leisure facilities.

Number of consultees raising issue: 2

Infrastructure (transport: road/motorway network)

Highways England Comment

The proposed allocation is of a significant size and is in close proximity to Junction 5 of the M61, yet includes no specific requirements for mitigation. It will be important to determine whether the mitigation measures identified for Sites 2 and 4 are considered sufficient to alleviate any further requirements for strategic interventions, and if so whether this development should be phased appropriately.

Number of consultees raising issue: 1

General congestion in the area

Westhoughton is already extremely busy with traffic, virtually gridlocked in rush hour. Westhoughton doesn't have the road network and infrastructure to cope with the number of cars this development would bring. The slightest traffic problem e.g. snow, road works, accident, sheer volumes of traffic creates a major backing up of traffic. There are no plans for increased capacity. The road network cannot cope with the influx of vehicles the GMSF would bring.

Number of consultees raising issue: 103

Site specific congestion: Centre of Westhoughton

During the 2015 consultation for the development of homes at Roscoe's Farm in Westhoughton it emerged that regarding 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 was passed, and took up most that 400 car capacity.

Number of consultees raising issue: 1

Site specific congestion: Chew Moor

Chew Moor is overwhelmed by traffic.

Number of consultees raising issue: 1

Site specific congestion: Lidl area

The junction at Lidl supermarket, which would become a through road, is extremely difficult to get out of from the primary school. Further housing would magnify this problem

Number of consultees raising issue: 1

Site specific congestion: Chequerbent Roundabout

Chequerbent roundabout is often gridlocked. Traffic is held up on all approaching sides to the roundabout, but the worst affected are Park Road and Syndale Way. Without a radical solution Chequerbent roundabout simply cannot cope with additional traffic.

Number of consultees raising issue: 9

Site specific congestion: Park Road

Park Road is often gridlocked. Traffic is almost at a standstill at busy times of the day.

Number of consultees raising issue: 4

Site specific congestion: Four Lane Ends

There is already really heavy traffic.

Number of consultees raising issue: 1

Site specific congestion: Platt Lane

It is already close to impossible to turn in or out of Platt Lane, what effect will the inevitable increase in traffic have on this junction?

Number of consultees raising issue: 1

Site specific congestion: Syndale Way

Traffic is almost at a standstill at busy times of the day.

Number of consultees raising issue: 1

Site specific congestion: Wigan Road

Wigan Road is very congested

Number of consultees raising issue: 1

Site specific congestion: Bolton Road/Manchester Road Junction

The junction of Bolton Road and Manchester Road is very congested

Number of consultees raising issue: 1

Site specific congestion: The Fairways

The Fairways is very congested.

Number of consultees raising issue: 1

Site specific congestion: The A6

The A6 is very congested, with trucks and wagons going down the road 24 hours a day.

Number of consultees raising issue: 1

Site specific congestion: The Hoskers

Traffic is especially bad trying to get off The Hoskers estate into Wearish Lane/Wigan Road

Number of consultees raising issue: 1

Site specific congestion: The M61

The M61 is very congested

Number of consultees raising issue: 6

Road traffic accidents: Impact of congestion

Traffic accidents blackspots already exist because of traffic congestion leading to frustrated drivers. More vehicles will result in more accidents.

Number of consultees raising issue: 2

Planning appeals

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

Number of consultees raising issue: 1

Condition of roads

Roads are in a poor condition. If we can't afford to maintain the roads as they are now, who is going to pay to maintain future development? The roads are not suitable for lorries.

Number of consultees raising issue: 2

Where are the proposals for improvements to local roads?

Number of consultees raising issue: 3

Proposed Improvement: Bypass

A bypass should be planned to relieve the town's congestion.

Number of consultees raising issue: 6

Your proposal for a 'Westhoughton bypass' will not alleviate the very heavy traffic already going through Westhoughton on the A58. The proposed relief road will simply move the pinch point.

Number of consultees raising issue: 2

Proposed Improvement: New Motorway Link

A new motorway link is required

Number of consultees raising issue: 1

Proposed improvement: Chequerbent roundabout

The only infrastructure provision is a link within Lee Hall to key pinch-point and accident black spot at Chequerbent Roundabout – a road that merely opens up Lee Hall and Hulton Park to development, whilst also pulling in traffic from Gibfield, Atherton, Leigh and Hindley – thus adding to existing problems rather than alleviating them.

Number of consultees raising issue: 2

Proposed improvement: Junction 5 of M61

The proposed new motorway from Junction 5 of the M61 will do nothing to alleviate local traffic, and might well worsen it.

Number of consultees raising issue: 1

Proposed improvement: M61

The M61 needs an extra lane from Westhoughton south to the already incredibly busy M62/M60.

Number of consultees raising issue: 2

Proposed improvement: bridge investment

Without bridge investment channelling traffic West to M61J6, this strategic allocation merely augments existing problems and sees Westhoughton sprawling westwards.

Access to the strategic allocation (congestion)

The potential access routes to the strategic allocation are very congested

Number of consultees raising issue: 1

Access to the strategic allocation (safety)

It is too dangerous to build more houses off Collingwood Way. The road itself is too narrow and has cars parked along the length of it. It is already too difficult for children to play out. On the two streets leading to Collingwood Way there is even less room.

Number of consultees raising the issue: 1

Piecemeal development

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.

Number of consultees raising the issue: 1

Pollution

We don't want more pollution from increased traffic.

Number of consultees raising the issue: 12

Infrastructure (public transport)

Poor quality of existing public transport

The trains and buses are very limited, expensive, dirty and unreliable. Railways are overused, in poor condition and there is no room for parking. There are no plans for improvements.

Number of consultees raising issue: 19

Train improvements

Whilst improvements (electrification/new trains) to the Manchester-Bolton-Preston line are welcome; the Manchester-Daisy Hill-Wigan line sees no investment.

Number of consultees raising issue: 1

Modal shift to public transport

Encouraging people to use public transport is completely impractical. Why do you think most households have two cars? What about older people or people with walking difficulties? Not everyone has a desk job. People travel by car for a variety of reasons.

Number of consultees raising issue: 2

Metrolink

Bolton/Westhoughton doesn't have Metrolink.

There is an indication that 'Key elements' of the plan will include 'Developing an integrated public transport system, with easy movement between different modes and services, supported by:

A rapid transit network, comprising Metrolink, suburban rail, and bus rapid transit, that acts as the high-capacity core of the system'.

So I presume that Westhoughton is now going to have a Metrolink facility?

Number of consultees raising issue: 2

Infrastructure (walking and cycling)

Encouraging people to walk/cycle is completely impractical. Why do you think most households have two cars? What about older people or people with walking difficulties?

Number of consultees raising issue: 2

I do cycle, but most of the time I am on the pavement due to the amount of cars and lorries on the road

Number of consultees raising issue: 1

Infrastructure (parking)

Car parking is often at a premium in town.

Number of consultees raising issue: 1

Infrastructure (Library's)

We need extra public services including libraries.

Number of consultees raising issue: 1

Infrastructure (sports facilities)

We need extra public services including sports facilities.

Number of consultees raising issue: 1

Infrastructure (sewerage system)

Recent development proposals under existing housing plans have highlighted a significant problem that must be addressed before any further housing development could reasonably be considered: the capacity of existing sewer systems. What about the drainage system?

Are we going to have months of already overcrowded roads being dug up to install new drainage and sewerage systems?

Number of consultees raising issue: 3

The United Utilities state that several large pressurised water mains and sewers cut through the site.

Number of consultees raising issue: 1

There are existing United Utilities easements which will need to be considered.

Number of consultees raising issue: 1

Infrastructure (power/utilities)

We have had issues with power cuts repeatedly due to demand and lack of facility. Westhoughton cannot take anymore developments without substantial investment in the electricity supply.

The Lee Hall application highlighted the need for more power generators. 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.

Number of consultees raising issue: 6

Infrastructure (Implementation)

Infrastructure requirements need to be rigorously enforced.

Number of consultees raising issue: 3

Westhoughton requires substantial investment in new major roads, transport systems and other infrastructure **before** large-scale development can be considered.

Number of consultees raising issue: 18

All social value suggestions within the framework must be assigned to improving the Westhoughton area and not taken by the larger area of Bolton.

Number of consultees raising issue: 1

Jobs

There are few jobs in the area, most of our large employers have gone. Where will the jobs for all these extra people come from?

Number of consultees raising issue: 4

Golf Course

As golf course owners we are concerned that the golf club practice field and 3 holes of the course have been proposed for development. No previous response has been submitted indicating that we are interested in developing the land. The land should be removed from the consultation. Please respond to this request and acknowledge that our request has been actioned.

Number of consultees raising issue: 1

Crime Rates

Crime rates within Westhoughton have already catapulted in the last 6 months. By adding houses, we are adding to our population which could lead to an even higher crime rate.

Number of consultees raising issue: 1

Unkempt Areas

The unkempt scruffy areas are a disgrace and should be getting money spent on them.

Number of consultees raising issue: 1

Quality of life

The proposals will result in a lower quality of life for residents. There comes a point when a town is at its optimum size, beyond that over-development can impact on quality of life, health, well-being and its sense of community. The scale of development proposed for Westhoughton is far too great.

Number of consultees raising issue: 7

The property developers will not care about the after-sales quality of life for their purchasers.

Number of consultees raising issue: 1

Residents would be negatively affected by the buildings works and construction

Number of consultees raising issue: 1

GMCA should take control from developers, make them design and build the housing GMCA wants – affordable, eco-friendly, sustainable – not simply what will give them greatest profit.

Number of consultees raising issue: 1

Loss of green spaces including green belt

Green spaces/green belt and the environment

Concerned about the loss of this valuable green space for not only residents but also the many local people who enjoy the area on a daily basis.

Green spaces sustain farming, are beneficial for our physical and mental health and wellbeing, allowing a place to rest, exercise and enjoy nature. We need our open spaces. Green spaces help reduce obesity.

The GMSF allocates vast swathes of green belt land, especially in the Westhoughton and Chew Moor areas. Westhoughton has suffered huge losses of green and open spaces. This is the last of any open countryside belonging to Westhoughton. It is a very beautiful area.

Number of consultees raising issue: 54

Green space within developments

New green spaces would be within developments and of little consequence to those who use and value our existing green belt.

Number of consultees raising issue: 1

Greenbelt: Reasoned justification

The reasoned justification for green belt release cannot be met at this strategic allocation. Are reasons for potential loss of green belt truly “exceptional circumstances” or calls for developers and landowners keen to reap the rewards of investment?

Number of consultees raising issue: 2

Green belt; urban sprawl

Westhoughton now merges with Daisy Hill, Wingates and Heart Common. Don't want Westhoughton to become an urban sprawl linked to Bolton, Atherton and Wigan. The spaces between towns matter.

Number of consultees raising issue: 3

Strategic Green Infrastructure

Environment Agency: As a strategic allocation there should be a strong commitment to the creation of strategic green infrastructure or the protection of key assets. Currently the policy only requires very high levels of landscaping and we recommend that this is strengthened. In particular Pennington Brook flows through this allocation and this should be protected/enhanced to support both the objectives of the Water Framework Directive and GMSF Policy GM12 (River Valleys and Canals) which seek to return rivers to a more natural state. Therefore we recommend that the policy includes the following wording (or similar): Protect and enhance Pennington Brook and provide a corridor of strategic green infrastructure around this feature.

Number of consultees raising issue: 1

Item 9 of Policy M61C3 (Green Infrastructure)

City of Trees: Item 9 should refer to very high levels of high quality green infrastructure (rather than landscaping)

Number of consultees raising issue: 1

Buffer

There should be a provision of green space between any new and existing properties to ensure the existing privacy of current housing is not compromised.

Number of consultees raising issue: 2

Environment

There will be a negative impact on the environment

Number of consultees raising issue: 2

Negative impact on the ecosystem

We breathe in oxygen, we exhale carbon dioxide; plants and trees inhale carbon dioxide and exhale oxygen. Excessive amounts of houses will literally take our breath away.

Number of consultees raising issue: 1

Item 10 of Policy M61C3

City of Trees: Item 10 should specify that the deciduous woodland should be extended and linked.

Number of consultees raising issue: 1

Other Protected Land (OPOL) Designation

This is Other Protected Open Land and it is understood that it is partly council owned land. It should not be allocated in the GMSF unless all other suitable OPOL is also allocated. Indeed, this may result in a reduction of Green Belt land that is required and the potential removal/reduction of allocation M61C2.

Number of consultees raising issue: 1

Wildlife

Wildlife General

Encouraging this land to be developed for housing will be to the detriment of many species of wildlife who live and nest in the area. The proposals will result in damage to wildlife corridors.

Westhoughton is 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?

Number of consultees raising issue: 15

Ponds

Lancashire Wildlife Trust propose the following additional policy requirement:

Ponds must retain linkages and provision of enough area of appropriate terrestrial habitats to support viable meta-populations of amphibians.'

Number of consultees raising issue: 1

Great Crested Newts

Lancashire Wildlife Trust: Mitigation must ensure adequate Great Crested Newt access over internal roads and other transport infrastructure associated with any development, for example through the provision of amphibian underpasses and safety barriers.

Number of consultees raising issue: 1

Delineated Baseline Ecological Networks/Greater Manchester Local Biological Records Centre

Lancashire Wildlife Trust: Subject to the reservations expressed, we welcome the intent of the policy requirements that any development here:

9. Incorporate very high levels of [sic- perhaps "very high quality" would be better?] landscaping, including the retention of and improvement to trees, hedgerows and water bodies.

10. Sensitively integrate the priority habitat area (deciduous woodland) located immediately adjacent to the southern boundary.

That said, in the absence of (a) delineated baseline ecological network(s) and the demonstrable transparent examination and analysis by your authority of the data held by the Greater Manchester Local Biological Records Centre it is unclear how this provision and incorporation might be achieved to optimum effect within the allocation area, if at all.

Number of consultees raising issue: 1

Land Banking

Developers have sites locally but leave them land-banked.

Number of consultees raising issue: 2

Flooding

SFRA

The **Environment Agency** is working to produce an updated Strategic Flood Risk Assessment at the Greater Manchester Scale that will review all site allocations. The EA expect any outputs from this work to feed into an updated policy for this site.

Number of consultees raising issue: 1

Sustainable Urban Drainage Systems

Environment Agency: There is no reference to the use of **Sustainable Urban Drainage Systems** within this strategic allocation. To comply with GMSF policies GM18 (Flood Risk) and GM25 (Allocations) we would recommend that additional wording includes reference to soft or green SUDS. Green SUDS have greater environmental benefits over hard engineered options (e.g. underground tanks/pipes). Suggested wording (taken from other Allocation policies) could be:

“Incorporate measures to mimic natural drainage through the use of green sustainable urban drainage to control the rate of surface water run-off”.

In addition, **City of Trees** state that Policy M61C3 should require the inclusion of green infrastructure based SUDs, and **United Utilities** state that consideration must be given to disposal of surface water in the most sustainable way.

Number of consultees raising issue: 3

Flood risk

There are already areas that are prone to flooding so more building will add to this problem, the land already gets very saturated when it rains.

Existing housing plans have highlighted a significant problem that must be addressed before any further housing development could reasonably be considered: significant flood risk. Examination of the recent Dixon Street application in Westhoughton highlighted a serious flood risk that necessitates further drainage surveys before a proper decision can be made on that application. The Lee Hall application in 2016 highlighted increased flood risks in the area due to the proposed development.

Number of consultees raising issue: 4

New town solution

Unless a whole new town is built with direct access off and on the M61 with its own dentists, doctors and schools this cannot happen. Planners should think in terms of creating new towns – built and resourced from scratch and more likely sustainable.

Number of consultees raising issue: 3

Spatial distribution

Why is Bolton's housing allocation primarily in Westhoughton? It is unfair to expect Westhoughton to take most of Bolton's requirement.

Number of consultees raising issue: 4

There is nothing on the plan in the Wigan area

Number of consultees raising issue: 1

Westhoughton developments cannot be considered in isolation. There are significant developments on the border (both existing allocations and new GMSF developments) - notably Atherton, Hindley Green and Hindley. All of these could bring more pressures to Westhoughton - especially congestion on the road network/trains. Likewise proposals for Wigan also need to consider the proposals in Bolton, specifically Westhoughton. Developments in Horwich must also be taken into account.

Number of consultees raising issue: 3

Unique identity/character

It is important to preserve what little remains of the unique identity of Westhoughton. The character of the township of Westhoughton will be altered forever. Westhoughton thrives because it is an independent town. The most quaint and beautiful places have a smaller population that work together in keeping their community as strong as possible, don't rid Westhoughton of that.

Number of consultees raising issue: 4

Westhoughton has had enough development already. Developers will build excessive numbers of houses in the area.

Number of consultees raising issue: 4

Heritage/Archaeology

Historic England make the following points:

The site is adjacent to a conservation area which includes a number of Grade II listed heritage assets.

The NPPF considers that any substantial harm to the significance or loss of a Grade II listed heritage asset (including setting) should be exceptional. The Council has a statutory duty under the provisions of the Planning (Listed Buildings and Conservation Areas) Act 1990 to pay ‘special attention’ to ‘the desirability of preserving or enhancing the character or appearance’ of its conservation areas.

The allocation does not appear to have been informed by any assessment of effects upon the historic environment which accords with the requirements of national planning policy as set out in the NPPF or the methodology set out in Historic England’s Advice Note 3. Without this assessment, the GMSF cannot demonstrate that the principle of development and the quantum (numbers) can be achieved on the site without harm to the historic environment. As a consequence the allocation is potentially unsustainable and therefore unsound. Any such assessment should be undertaken by an appropriately qualified conservation specialist familiar with the site.

Number of consultees raising issue: 1

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.

Number of consultees raising issue: 1

House Value

The value of my house will depreciate

Number of consultees raising issue: 2

Fund generation

Do not want to see Westhoughton expand into a housing estate that is only there to generate funds for Bolton Council.

Number of consultees raising issue: 1

Mining

I am worried about how many years of mining has affected Westhoughton and surrounding areas.

Number of consultees raising issue: 1

[**M61C4 West of Gibfield, Atherton**](#)

Who Responded

There were 29 submissions to this section. These were from 25 individuals, two couples or other family groups, no unknown people (name not supplied/illegible), no politicians, one developers/landowners (agent; Mr Chris Weetman), and one other organisation; the Environment Agency.

Summary of Issue(s) Raised

Housing need and supply

The housing requirement for Wigan is too high because lower immigration, as a result of Brexit, is not considered.

Less or no Green Belt land, including at West of Gibfield, is needed to accommodate new housing because:

- A disproportionately high number of homes are proposed in the Atherton area compared to the rest of Wigan Borough.
- There is a considerable amount of housing already proposed and under construction in the borough.
- Brownfield sites in the urban area should be developed instead.
- There are lots of vacant properties in the area which should be occupied before Green Belt is released; there are approx. 12,000 across Greater Manchester.
- There are lots of houses for sale in the area.
- Wigan Borough can meet its housing need from sites in the urban area.
- Serviced apartments for the over 65s should be built instead of bungalows which will reduce land take.

More affordable homes should be built on the site.

Employment land need and supply

Empty business units should be used first, and refurbished where necessary to meet modern business needs, before releasing land in the Green Belt for new units.

Loss of Green Belt

The site and the other nearby GMSF allocations in Bolton (Hulton Park, West of Westhoughton and M61 Junction 6) will result in significant urban sprawl, merging Atherton and Westhoughton.

A disproportionately large amount of Green Belt will be lost around Westhoughton and Atherton compared to other areas in Greater Manchester.

Highways, traffic and access

The existing road network is already overcapacity at peak times including: the roundabouts at Chequerbent for the M61 at Junction 5 and at the intersection of the A58 and A6; Syndale Way; Schofield Lane; Wigan Road; Atherleigh Way; Lovers Lane; Leigh Road; Newbrook Road; and Platt Lane. This proposal, together with the other proposed GMSF allocations and existing development commitments in the area e.g. South of Atherton, will exacerbate this.

The proposed new link road from Atherleigh Way to the M61 will not resolve traffic congestion because it will encourage more vehicles to travel through the area.

More traffic will increase the risk of traffic accidents and delay the response time of emergency services.

The additional traffic will make pot holes in the local roads worse.

Public transport

The car parks at Atherton and Westhoughton stations are full and should be expanded. The trains at these stations are full at peak times as they only have three or four carriages.

The proposals to upgrade the rail infrastructure and services on the Atherton line are welcome.

Nature conservation

The development will result in the loss of wildlife habitats for: many species of birds and birds of prey; insects; great crested newts; squirrels; foxes; bats; and deer.

The SBI on the site should be retained and not developed.

What measures will be put in place to protect wildlife on site?

Open space and recreation

The proposal will result in the loss of open land used for recreation, e.g. walking, dog-walking and fishing.

Public rights of way across the site should be retained.

There should be a green buffer between the development and existing houses.

Where will new open space provision be located on the site?

New open space provision on the site will not be as good for recreation as the open fields that will be lost.

The site was previously proposed as a country park by Black Country Properties when the Gadbury Fold site was developed. The country park never materialised and local residents are still angry about it and fear this will happen again.

Schools, doctor surgeries and dentists

Local schools, GP surgeries and dentists are at full capacity and will not be able to accommodate demand from the site.

How will new schools, GP surgeries and dentists be funded?

Ground conditions

Ground conditions are poor on the site, which was previously used to store mining spoil.

Poor engagement

Many residents did not see the site notices and were only informed by the GMSF from other residents.

A letter should have been posted to all residents in the area.

There was a lack of detail on display at the drop-in sessions, including the existing housing sites.

Air Quality and noise pollution

Air quality in the area is already poor and will be made worse by the additional traffic created by new houses, businesses units and the new link road.

The new link road will increase noise pollution.

Health

The cumulative effect of new development in the area on traffic, noise, air pollution, green space and urban sprawl will make the area unpleasant to live in and have a negative impact on people's wellbeing.

Developers, landowners and stakeholders

Peel support the allocation, but consider more housing should be proposed on the site and query developer contribution towards new road infrastructure.

The EA recommend that the allocation policy should refer to SUDS, Hall Lee Brook, green infrastructure and cross reference Policy GM12 River Valleys and Canals.

Natural England are concerned about the impact on ecological networks between designated in the area sand recommends that the site and all other allocations are screened to assess their impact on air pollution, recreation and water pollution.

City of Trees recommend that the allocation policy should say more about green infrastructure and recreational links with the surrounding area.

The allocation should extended to north east to cover a parcel of land that would be a Green Belt island.

Other issues

Farmland will be lost.

More houses in the area will increase crime.

The views across the fields will be lost.

The residential amenity and privacy of residents living adjacent to the proposed development will be affected.

Loss of property values in the area, particularly houses that are adjacent to the site.

A gas pipeline runs through the site.

M6 Corridor

Who Responded

There were nine submissions to this section. These were from seven individuals, no couples or other family groups, no unknown people (name not supplied/illegible), Saddleworth Parish Council, no developers/landowners, and Natural England.

Summary of Issue(s) Raised

Employment land need and supply

There is an over-supply of employment land along the M6 Corridor in Wigan Borough and St. Helens Borough.

Loss of Green Belt

Too much employment development is proposed along the M6 Corridor in Wigan and St. Helens, which would merge Wigan, Ashton-In-Makerfield and St. Helens creating an area of large urban sprawl.

Highways, traffic, access

Employment development proposals along the M6 Corridor in Wigan Borough and St. Helens Borough will, cumulatively, increase traffic congestion on roads in the area which are already unable to accommodate existing amounts of traffic at peak hours.

Nature conservation

The EA recommend that the policy refers to the role of the natural environment in the corridor and that additional wording is included so that the policy supports the wider GMSF policies on Natural Environment.

Natural England recommend that there be a commitment in the masterplan or SPD that there will be no hydrological impacts from the site allocations upon designated sites located in the Wigan Flashes.

M61C1 Junction 25

Who Responded

There were 81 submissions to this section. These were from 67 individuals, six couples or other family groups, no unknown people (name not supplied/illegible), no politicians, two developers/landowners (David & Patricia Johnson, Mr Pravin Parmar), and the Environment Agency.

Summary of Issue(s) Raised

Support for site

A very small number of reps stated that the site is needed to boost employment development in Wigan, Greater Manchester and the North West and is sited at an optimum location for this along the M6.

Employment land need and supply

The site was dismissed by the Planning Inspectorate in 2013 during the Local Plan Core Strategy Examination because the site was not required to meet employment needs to 2026.

The jobs created by the development, in the logistics sector, are likely to be low paid and low skilled. Well paid, high quality jobs cannot be guaranteed.

The number of jobs proposed to be created on the site is overestimated. Global trends in automation mean that many of the jobs created by the development would likely be redundant in the near future.

Wigan Council should be aiming to create higher skilled jobs in the borough to stem the flow of skilled workers commuting out of the borough.

There are many vacant business units and previously developed sites that should be developed before releasing the Green Belt, including the former Asda distribution centre at Wheatlea Industrial Estate, Glasshouse Business Park, empty offices at South Lancs Industrial Estate, Haslemere Industrial Estate, business units in Wigan Town Centre. The extent to which these could be refurbished or rebuilt to meet modern business needs should be assessed. Employment land is also available at Haydock and Skelmersdale.

Town centre locations should be developed for employment development instead of the Green Belt.

Large sites with motorway frontages are not needed in Wigan as there have been recent new and expanded business developments in other locations e.g. the new Nicepak development at Westwood Park and the expansion of Arrow XL at Martland Park.

Too much employment development is proposed along the M6 Corridor in Wigan and St. Helens.

The amount of employment floorspace proposed on the site is small compared to the site area, so there could be pressure to intensify employment uses on sites which would have a greater impact on traffic, pollution and amenity of local residents.

Less office space is needed as more people are now working from home.

The site is not clearly visible from the M6.

Housing need and supply

Housing development is not needed on the site because:

- The housing need assessment does not consider lower immigration as a result of Brexit.
- There are many houses for sale in the Winstanley area.
- Previously developed sites in the urban area should be developed first, including the former Abraham Guest High School site in Orrell. Wigan has the highest number of previously developed sites in England.
- There are lots of vacant properties in the area which should be occupied before Green Belt is released.

Where will affordable homes be built?

The area is already built up and infrastructure is already overstretched. Existing development commitments, including at South Lancashire Industrial Estate, Foundry Lane, Little Lane and Saddle Junction will exacerbate this.

80 homes will not make a meaningful contribution to the supply of housing land in the borough.

Loss of Green Belt

The site was proposed for employment development in Wigan Local Plan Core Strategy. But the Inspector dismissed the site in 2013 during the Examination because:

- The site was not required to meet employment needs up to 2026.
- The site would significantly harm the openness of the Green Belt.
- The site would be contrary to the purpose of including land within the Green belt.
- The open countryside would be lost affecting the overall character of Wigan and Ashton-in-Makerfield.
- The recreational value of the land would be lost.
- The M6 slip road is a clear defining boundary between Ashton and Wigan.

Why is the site being proposed again when nothing has changed?

It is premature to propose the site for development as the Core Strategy Inspector concluded that it should remain in the Green Belt to at least 2026.

The proposed employment developments along the M6 Corridor in Wigan and St. Helens would constitute urban sprawl and merge the settlements of Wigan, Ashton-In-Makerfield and St. Helens.

There are no special circumstances to remove the site from Green Belt.

Highways, traffic, access

The existing road network is already overcapacity at peak times in Bryn/Ashton, Pemberton, Orrell, Winstanley, Highfield, Hawkley and the M6, including:

- A49 Warrington Road and the Marus Bridge junction; where the new traffic signals have not reduced traffic congestion. It can take 40 minutes to travel from M6 Junction 25 to Poolstock.
- The M6 Junction 25 slip road.
- A49 Wigan Road through Bryn.
- Soughers Lane to Wigan Road.
- Between M6 Junctions 23 and 26.
- A58 Liverpool Road in Ashton.
- The Hawkley Hall estate, where it can take up to 30 minutes to exit via Carr Lane or Fulbeck Avenue at peak times.

The A49 and the M6 J25 slip road are also heavily congested on match days for Wigan Athletic and Wigan Warriors.

The existing road network will not be able to accommodate the amount of traffic that the site would generate from the site, especially HGVs.

The road network will not be able to accommodate the cumulative impact of all the development proposals in the area, including the proposed GMSF allocations at J25 and J26, proposed developments at Landgate, Pemberton Park, Goose Green and the major employment developments proposed in Haydock (Florida Farm and Haydock Point).

Buses find it difficult to navigate the mini roundabouts by St. Aiden's Church and Pemberton Railway Station. HGVs would encounter the same problem if they used this route to access the M6 northbound at Junction 26.

Castlemere Close is unsuitable to access the proposed 80 homes from because it is narrow, roadside parking contributes towards this problem.

Tan House Drive is a wider road than Castlemere Close and should also be used to access the proposed housing.

Proposals to make Junction 25 an all-ways junction is an aspiration with no firm plans by Highways England. If it is not committed, the site should not be developed. If Junction 25 remains southbound only, northbound traffic will travel through Winstanley, Highfield and Pemberton to access Junction 26 or use J25 to travel south bound to Junctions 24 to turn around.

Traffic congestion in the area holds up emergency services vehicles.

More cars and HGVs on the roads will increase the risk of traffic accidents.

The M58 link road proposal is still some years away from starting.

Nature conservation

Loss of wildlife habitats for birds (including lapwings, nuthatch, woodpeckers, partridge, barn and tawny owls, sparrow hawks, kestrels, hawks and oyster catchers, pheasants, buzzards, cuckoos, willow tits) toads, frogs, foxes, deer, badgers, hedgehogs, water voles, bats, minks, stoats, adders, and great crested newts.

Open space and recreation

The site is well used for recreation, e.g. walking along public footpaths on the site and along Drummers Lane, which will be lost if the site is developed.

The site contains woodland, fishing ponds and other landscape features; its development would have a significant detrimental impact on the local landscape character.

There are very little green space and recreation facilities in Winstanley.

Schools, doctor surgeries and dentists

Local schools, GP surgeries and dentists are already at full capacity and will not be able to accommodate demand from the site.

Cuts to school budgets will also affect the capacity of schools in the area to accommodate new pupils.

Flooding, drainage and water quality

The sewers are at full capacity in the area, which was one of the reasons why the site was dismissed during the Core Strategy Examination. The Barratt's estate is drained via a septic tank.

The green fields on the site absorb rainwater which reduces flood risk and naturally filters out pollutants.

Construction of the new traffic light junction at Marus Bridge caused flooding in 2016, which has not occurred in 47 years.

The gardens to the properties on Kielder Close and the fields to the rear, the latter which are on the site, flooded in December 2015. The floodwaters flowed to the east and affected the bungalows on Wigan Road. This area of the site has flooded three times in the past 10 years.

Landgate flooded last year, which was in part, caused by surface water runoff from the fields around Drummers Lane.

Marus Bridge Primary School and Winstanley Primary School were recently flooded as a result of heavy rainfall.

There are two water treatment plants on the site and a water pipeline underneath the site.

Retail and town centre facilities

Additional car parking provision is required at Winstanley Local Centre.

Poor engagement

The consultation period was too short and there was not enough publicity about it.

Many residents did not see the site notices and only found out about the GMSF from other residents.

A letter should have been posted to all residents in the area.

There was a lack of detail on display at the drop-in sessions, and the Council staff who attended could not answer the questions from residents.

Air quality and noise pollution

There are high levels of air and noise pollution along the M6 and A49 Warrington Road. This area has some of the worst air pollution in England. The significant level of traffic that the site will generate, especially HGVs, will exacerbate this.

The development will cause light pollution.

There are no firm details in the policy about how residential amenity will be safeguarded.

Increased noise and air pollution will have a negative impact on the health and wellbeing of local people.

Ground conditions

The area was mined for coal which may have an impact on developing the site.

Health

The cumulative effect of more air pollution, congested roads, more built development, loss of fields and green space will have a negative impact on people's wellbeing.

Developers, landowners and stakeholders

Historic England object to the allocation as there is no assessment on the impact on grade II listed heritage asset.

Lancashire Wildlife Trust, City of Trees and the EA recommend that green infrastructure on the site should be strengthened.

United Utilities and the EA recommend that the allocation policy should be stronger on the use of SUDS.

Developers and landowners support the site, but with some recommendations to change the balance of employment development and housing on the site, access arrangements and green infrastructure.

Other issues

Loss of farmland, particularly if more UK grown food is needed after Brexit.

Loss of view across the fields.

Loss of privacy to properties adjacent to the site.

Loss of the value of property adjacent to the site.

[**M62C Junction 26**](#)

Who Responded

There were 462 submissions to this section. These were from 335 individuals, 21 couples or other family groups, five unknown people (name not supplied/illegible), Lisa Nandy MP.

There were two submission from developers/landowners:

- Barratt Homes Manchester
- Leigh Lancashire Trust, Hardy Family, and other landowners represented by P Wilson & Co. (single submission)

There were six submissions from other organisations:

- Environment Agency
- Friends of the Earth
- Historic England
- Reflections Wigan CIC
- Save the Bell Green Belt
- Wrightington, Wigan And Leigh NHS Foundation Trust

Summary of Issue(s) Raised

Employment land need and supply

The site was proposed for employment development during the development of the Wigan Local Plan Core Strategy, but was dropped. Why is it being proposed for development again?

The site is not required to meet employment needs because:

- The Wigan Local Plan Core Strategy and Draft Employment Land Review state that enough employment land has been identified to meet needs to 2026 without the need for Green Belt sites.
- There is an oversupply of employment land along the M6, M62 and M58 – existing sites and new land is being proposed in St. Helens around M6 Junctions 23 and 24, in Skelmersdale next to the M58 and along the M62 in Warrington at Omega.

Vacant business units and previously developed land in the borough and in neighbouring districts should be used first e.g. Martland Park, Lamberhead Industrial Estate, South Lancashire Industrial Estate and Goose Green.

Developing Green Belt sites for employment development will be at the expense of regenerating existing employment sites in the urban area that will remain undeveloped.

The jobs created by the development, in the logistics sector, are likely to be low paid and low skilled. Well paid, high quality jobs cannot be guaranteed.

The number of jobs proposed to be created on the site is overestimated. Global trends in automation mean that many of the jobs created by the development would likely be redundant in the near future.

Wigan Council should be aiming to create higher skilled jobs in the borough to stem the flow of skilled workers commuting out of the borough.

Housing need and supply

The housing need assessment does not consider lower immigration as a result of Brexit.

There is a considerable amount of housing already in the Orrell area.

Previously developed sites should be developed, and vacant properties occupied, before releasing land from the Green Belt is considered.

Where will affordable homes be built?

Loss of Green Belt

The development's impact on the Green Belt has not been assessed.

There are no special circumstances to remove the site from Green Belt.

The site would merge Wigan and Orrell creating a large area of urban sprawl.

Releasing the site from Green Belt is contrary to the Wigan Local Plan Core Strategy.

The site is not referred to in the Wigan Initial Draft Allocations and Development Management Plan.

Highways, traffic, access

Orrell, Pemberton, Kitt Green and Lamberhead Green are already affected by heavy traffic congestion at peak hours, including:

- A577 Orrell Road/Ormskirk Road in Orrell and Pemberton.
- City Road Spring Road, Latham Lane and Bell Lane in Kitt Green.
- B5026 Gathurst Road in Orrell from HGVs travelling towards Martland Park from M6 Junction 26.

- Spring Road, east of Prescott Lane which is not wide enough for two large HGVs to pass each other.
- The Gathurst Road and Orrell Road junction in Orrell.
- Coniston Avenue in Orrell.
- Between M6 Junctions 20 and 27, where a journey of 15 miles takes over an hour.
- The M6 Junction 26 slip roads.

The existing road network is already congested, and will not be able to accommodate the additional level of traffic that this site, especially HGVs, would generate. The cumulative impact of other development proposals and commitments, including the GMSF allocation at J25, Landgate, Pemberton Park, Goose Green, and key employment proposals at Haydock, would exacerbate this further.

The M6 Junction 26 has recently been improved with new traffic lights, but it has not reducing traffic congestion. The junction would need to be improved further to accommodate the traffic generated by the development.

The proposed link road from M6 Junction 26 to Martland Park would not overcome congestion problems in the area and the amount of vehicle movements, especially HGVs, which the development would generate.

The proposed link road from Orrell Road to Martland Park has been proposed twice in the past and as early as 1985. The case for building the road is no stronger now than it was then.

More cars and HGVs on the roads will increase the risk of traffic accidents.

Public transport

More sustainable forms of transport should be promoted in the area e.g. cycling.

Nature conservation

Loss of wildlife habitats for birds (including skylark, lapwings, nuthatch, woodpeckers, partridge, barn and tawny owls, sparrow hawks, kestrels, hawks and oyster catchers, pheasants, buzzards, cuckoos, willow tits) toads, frogs, foxes, deer, badgers, hedgehogs, water voles, bats, stoats, and great crested newts.

Part of the site is used as a donkey sanctuary to keep the Blackpool donkeys during winter.

Open space and recreation

Development of the site would have significant detrimental impact on the local landscape character.

The public rights of way across the site to Dean Wood, Porters Wood and the Leeds Liverpool Canal should be retained and enhanced.

Even if the public rights of way across the site are maintained, they will not be attractive walking routes through an industrial area.

There are few parks, play spaces and open spaces in the local area. The site is an important recreation resource for local people to walk and enjoy. Local residents will have to walk further afield to find green spaces.

The site is valuable area of greenspace to prevent, mitigate and adapt to climate change by storing carbon and reducing the risk of flooding.

How will the nearby allotments be affected?

The site is occupied by significant landscape features which would be lost as a result of development, including woodland areas that are subject to TPOs towards the southern end of the site.

Schools, doctor surgeries and dentists

Local schools, GP surgeries, hospitals and dentists are at full capacity and will not be able to accommodate demand from the site, they are already struggling to cope from existing residents and the demand generated from new housing sites in the area.

Flooding, drainage and water quality

The development will reduce the capacity of the land to hold surface water, therefore increasing surface water run-off, the speed it reaches the River Douglas and flood risk.

The site will put pressure on the sewerage network.

Developing the site will have a negative impact on water quality.

Spring Road becomes flooded after heavy rainfall from surface water runoff from the fields on the site.

Retail and town centre facilities

Orrell Local Centre will not be able to accommodate the demands from the development on the site.

Poor engagement

The consultation period was too short and there was not enough publicity about it.

Many residents did not see the site notices and only found out about the GMSF from other residents.

A letter should have been posted to all residents in the area.

Air quality and noise pollution

Development on the site will generate a huge amount of traffic, especially HGVs, which will increase air and noise pollution and will adversely affect the health and amenity of nearby residents and pupils at Abraham Guest School which is adjacent to the site.

Development on the site will create light pollution.

HGVs will cause vibrations to nearby residential properties.

An air quality assessment that considers the site, nearby GMSF allocations and from existing development sites should be undertaken.

Ground conditions

The area was used for coal mining which may have an impact on developing the site.

Health

The cumulative effect of more air pollution, congested roads, more built development, loss of fields and green space will have a negative impact on people's wellbeing.

Developers, landowners and stakeholders

Some developers and landowners support the allocation, but recommend that it should be residential led. Other developers and landowners agree to the employment led development, whilst one land owning family object to the allocation.

Highways England believe that more understanding of the road infrastructure proposals for the site is required.

The Environment Agency recommend that the allocation policy is strengthened around the use of SUDS.

Natural England are concerned about the development's impact on the hydrology of the Wigan Flashes.

City of Trees believe that the allocation policy should be strengthened around green infrastructure and recreation links.

Lisa Nandy, MP for Wigan, believes that Green Belt should be protected to prevent urban sprawl and has concerns about air quality and road congestion.

Other issues

Loss of land that is actively used for farming particularly when growing more food in the UK might become necessary after Brexit.

The farm is important to the local community activities e.g. Reflections Wigan CIC.

Loss of view across open fields.

Loss of privacy and amenity to existing properties adjacent to the site from noise, pollution, overlooking, loss of light and overbearing shed development.

Loss of value of property adjacent to the site.

More houses in the area will put strain on local services such as bin collecting and street cleaning.

Could the development accommodate a church/community building to serve local residents?

[Other Allocations](#)

[OA1 North Bolton Strategic Opportunity Area](#)

Who Responded

There were 675 submissions to this section. These were from 557 individuals, 49 couples or other family groups, three unknown people (name not supplied/illegible),

There were five submissions from politicians/groups:

- Bolton Green Party
- Cllr Hilary Fairclough
- Cllr Norman Critchley & ward colleagues (Bromley Cross, Bolton)
- Cllr Stuart Haslam
- Sir David Crausby MP

There were nine submissions from developers/landowners:

- Bilsdale Properties Limited
- David Currie & Co, receivers of the former Holland Nurseries
- John Taylor, Horrocks Fold Farm
- Oakmere Homes
- Oltec Group Ltd (Bradshaw Rd)
- Open Golf and Leisure LTD (Bolton Open Golf Course)
- Rowland Homes
- The Last Drop Hotel Limited (Emerson Group)
- Wainhomes NW Ltd

There were five submissions from other organisations:

- Environment Agency
- High Lawn C.P. School

- Historic England
- Natural England
- The Campaign to Protect Rural England, Friends of the Peak District & the NW Transport Roundtable (joint submission).

Summary of Issue(s) Raised

Infrastructure: General

The prospect of adding 3000 homes to this area under its current infrastructure is nothing short of fanciful. No amount of contribution from the potential developers is going to address this problem adequately, especially since a lot of the challenges cannot be overcome by throwing money at them. The infrastructure will become unmanageable and is insufficient to cope with the additional residents and traffic.

Schools

Schools are oversubscribed/at full capacity and will not be able to cope with the additional residents. 3000 houses would require at least one new secondary school and two infant/junior schools, where would they be built?

Health Provision

Dentists are full. Any increase in housing and population will impact already overcrowded dentists.

Doctors have long wait times. Any increase in housing and population will impact already overcrowded GP's.

Medical services are insufficient to cope with the additional residents. Any increase in housing and population will impact already overcrowded medical facilities.

Any increase in housing and population will impact already overcrowded hospital.

The existing health centres are already running at full capacity. Any increase in housing and population will impact already overcrowded health centres. **

Transport: Road Network

Congestion

There is a lack of suitable road infrastructure in North Bolton. The roads are congested with inadequate road provision and are insufficient to cope with the additional residents and traffic. An increase in houses, cars and population could lead to further gridlock.

Astley Bridge and the Bromley Cross region are particularly congested.

Blackburn Road is a huge concern in the Astley Bridge area where it already takes from 30-45mins to drive 0.5miles in the morning & evening rush hour. Blackburn Road between Bolton town centre and Egerton is grid locked in the morning and evening rush hour.

A 2.5-mile journey from North Bolton into Bolton town centre routinely takes 30 minutes - adding more houses will slow us down even further.

Bolton council hasn't looked after the 3 roads out of Bolton, rush hour is horrific. A 10-minute journey will take a good 40 minutes.

Road journey times are getting worse and worse. - it takes 45 minutes to an hour to get onto the motorway in rush hour (which goes from 7-10 during the week and also 10-3 at weekends because of the Trafford centre). The east lancs road scheme has made a rush hour journey to Manchester a 1.25-hour nightmare.

The large portion of North Bolton is served by two roads leading to the major transport routes around the North West, the A666 and the A676. Both of these roads suffer from major congestion during peak times already, and would grind to a halt with the addition of so many cars.

It has to be accepted that the majority of people in the area head South, either into Bolton or Manchester for work and these routes would become gridlocked.

An increase in traffic will also cause safety concerns.

More traffic, more pollution, more illness

There is also a greater risk to people safety with the increase in cars and pollution.

[Public Transport](#)

[Bus service](#)

There is inadequate bus service provision. There are no links to other bus operators to allow journeys other than simple into town journeys at totally unpredictable times in daylight hours.

The large portion of this area is served by two roads leading to the major transport routes around the North West, the A666 and the A676. Both of these roads suffer from major congestion during peak times already, and would grind to a halt with the addition of so many cars. It has to be accepted that the majority of people in the area head South, either into Bolton or Manchester for work and these routes would become gridlocked.

[Train service](#)

There is inadequate train service provision.

The rail service has become more reliable but is at best half hourly and only hourly at off peak times. We have oldest trains on the network including the infamous pacers (The promised replacement in about 3 years' time is laughable). The trains are overcrowded, sometimes passengers at the next station down from Bromley cross are not allowed to board and have to wait 30 minutes or an hour for the next one.

There is a marked difference in quality and reliability of service between north and south Manchester which our elected representatives have failed to address.

The train line to Bolton/Manchester is standing room only from Bromley Cross already, and there is inadequate parking for its current users.

[HS2](#)

HS2 will not make a meaningful difference. The money needs to be spent locally.

[Other public transport comments](#)

From North Bolton it takes 1.75 hours each way to Wythenshawe hospital with a combination of trains and trams. This is a disgrace for any public transport system. It only works for the simplest

journey into central Manchester or Bolton and not for anything more complex. The big strategic infrastructure projects just do not deliver for the public.

In relation to getting to London from North Bolton the 2-hour point to point journey with virgin trains is not the problem. The problem is getting to and from Piccadilly by either train or car; either way 1.5 to 1.75 hours each way allowance needs to be built on. HS2 will not make a meaningful difference. The money needs to be spent locally.

Transport Assessments

Transport assessments for developments need to be scrutinised carefully to ensure their conclusions are robust.

Green Infrastructure General

North Bolton is blessed with some wonderful countryside and wildlife that you would not imagine for a large town with an industrial past. Our open spaces is what makes Bolton my town great, I don't want any open space to be a memory I want to take my grandchildren there and enjoy it like I did as a child. The areas offered for development in the area should be preserved and not built on.

Hands off our green open spaces. Bolton is already struggling with poor mental health, heart problems. Where to people go to walk and engage in the countryside to help them get better??

Areas contained within this area, such as Egerton and Bromley Cross, are desirable due to their access to countryside. This will be destroyed based on the proposed plans. The area will lose all of its appeal and the natural landscape will be damaged beyond repair.

All the sites in North Bolton are used by myself/ friends / family for walking / running and general enjoyment of the countryside and any of them would be sadly missed if built on.

Green Belt

I believe Bolton Council adopted the Development Policy Framework, which remains in place until 2026 and states that Green Belt sites will not be developed.

Housing Type

There is no shortage of higher value, 4-5 bed properties in the North of Bolton.

There is a shortage affordable housing in North Bolton.

Village Feel

Areas contained within North Bolton, such as Egerton and Bromley Cross, are desirable due to their village feel. This will be destroyed based on the proposed plans. The area will lose all of its appeal.

Bolton Town Centre

Providing additional housing on the outskirts of Bolton will not necessarily bring more people into Bolton town centre unless further good retail outlets and restaurants are attracted to the area - in particular the town centre. What plans do Greater Manchester and Bolton Council have to regenerate the existing town centre that will attract more businesses?

There are a large number of brown field sites in the Bolton area c.11,000. Why can't these be re-developed to make the existing Bolton centre and surrounding area an attractive place to live

overall, rather than building on Green Belt and protected areas we enjoy walking through and for leisure activities.

OA2 Elton Reservoir Area

Who Responded

There were 1494 submissions to this section. These were from 1366 individuals, 51 couples or other family groups, 23 unknown people (name not supplied/illegible), one politician (Councillor Roy E Walker).

There were two comments from developers/landowners; Peel Group and Taylor Wimpey Ltd.

There were four submissions from other organisations:

- Environment Agency
- Friends of the Earth
- Historic England
- The Campaign to Protect Rural England, Friends of the Peak District & The NW Transport Roundtable

Summary of Issue(s) Raised

Some support for the proposal, for the following reasons:

- The Metrolink stop will serve the development and will help relieve congestion in the area. However, car parking will be required as residents in the area already experience problems with off-street parking outside their properties;
- This will turn an underused, largely inaccessible area into a local asset, if done sensitively and is managed and maintained properly;
- Improvement in the leisure and recreational facilities at Elton Reservoir would be most welcome.

Objection to loss of Green Belt. The land provides an important function in separating the towns of Bury and Radcliffe. The evidence in the Greater Manchester Green Belt Assessment supports this finding. This is nothing more than a Green Belt land grab. No exceptional circumstances exist.

Elton Reservoir is an important 'green lung' for Radcliffe offering opportunities for recreation and relaxation and being a reason why many choose to live here:

- Its loss in an area with shrinking amenities, particularly in and around Radcliffe, would result in a reduction of quality of life, air quality and would be to the detriment of public and mental health.
- Recreation pursuits and leisure use will be curtailed by the fact that the area is to be reduced, there is already a country park and so new facilities are not needed.
- Recreational facilities at Elton Reservoir, the sailing club, public footpaths and the towpath on the Bury, Bolton and Manchester Canal should all be retained as part of any proposal.

- Many disagree that the majority of the area is not publically accessible as the site is immensely popular with walkers and has an extensive network of public rights of way.

It is not clear what new multi-functional green infrastructure means and where this will be provided. There is confusion as to how this can be provided when it is proposed for development and why new green infrastructure is needed when there is already an abundance present. Evidence from the Greater Manchester Ecological Unit which identifies the site as being important for green infrastructure is being ignored. The proposal is in direct conflict with policies GM7 and GM8 of the GMSF and with Bury Council's own policies and evidence on green infrastructure and wildlife corridors;

A large number of comments were received highlighting biodiversity issues:

- The allocation is contrary to national planning policy at Paragraph 110 which requires land to be allocated with the least environmental or amenity value. There are 7 Sites of Biological Importance on site. These must be protected, placing them within a housing allocation is illegal;
- This is one of the most biodiverse areas in the Borough, supporting 100 different including aquatic life in many small ponds. Species include mammals such as roe deer, brown hare, stoat, weasel, mink, shrew, hedgehog and seven protected species of bat;
- The importance of the intricate mosaic of habitats across the Elton Reservoir site cannot be overstated. Elton Reservoir is a haven for breeding and wintering migrating birds and has a reputation as being one of the most important areas within the North West of England for birdwatching. It was also identified as 1 of just 9 biodiversity opportunity areas for Great Crested Newts in the Ecological Framework for Greater Manchester;
- The Starling Wood area is covered by pasture woodland and forms part of an important wildlife corridor link;
- The proposal, even with the introduction of an 'urban park', would decimate wildlife habitats or at best would render them sterile, driving away the rich biodiversity this green corridor provides;
- No ecological study outlining the issues and the proposed impacts has been produced;
- Wildlife corridors designated in the Bury UDP should be designated by the GMSF;
- The proposed number of dwellings will have too large an impact to be adequately mitigated, although this may be achievable with a comprehensive masterplan, management and long-term funding;

Significant concerns regarding the ability of the existing transport infrastructure to cope with the additional residents, particularly as the current network is already prone to heavy congestion. Bury and Bolton Road currently carries a lot of traffic at peak times and this converges with other routes from west Bury at Bury Bridge which is currently the only major bridge crossing point over the River Irwell between Ramsbottom and Radcliffe for 11 miles. New highways solutions are required to tackle what is a serious issue, with or without this proposal. Bus services in the area are also subject to long delays.

The proposed transport infrastructure improvements will not aid the current situation and are unlikely to be provided:

- Adding another Metrolink stop will further overload a system at capacity and which is costly and unreliable, and will not relieve road congestion as most people in Bury use cars;
- The provision of cycle routes and the necessary upgrade to Metrolink to improve capacity will be funded by private developers;
- The link road serving the new residents will still feed onto existing congested trunk roads and side roads, creating extra pressure elsewhere. Key junctions cannot be improved due to lack of space. The road will not benefit residents in and around the Starling Road area to the north of the allocation as it will be congested further south.

Huge pressure will be placed on existing services which are already struggling to cope:

- Radcliffe has suffered from a loss of urban structure and amenities recently and is in desperate need of new facilities to meet existing demand, even without this proposal;
- There is no secondary school in Radcliffe. Schools in the Bury West area are almost all oversubscribed and will require extra capacity;
- There are very few health centres and pharmacies in the area and a local maternity service was lost recently so the Clinical Commissioning Group requires extra funding to help meet the demands of the additional residents;
- New localised shopping facilities are required to not only serve the residents of the proposed site but also other recent piecemeal development such as at Spen Moor.

The land is unstable due to the presence of coal mining shafts in and around the canal and reservoir, some of which are causing subsidence. Extensive research is required on the grounds of safety. It is identified as a 'Development High Risk Area' by the Coal Authority.

Concerns regarding the potential impact of the development on flooding, which due to the natural lie of the land will put many properties at risk. Radcliffe was severely hit in the Boxing Day 2015 floods. The agricultural fields currently soak up and hold huge amounts of rainwater which is released gradually into the water courses, development will speed up runoff. The dam wall has been repaired twice in the last 10 years, taking 6 months to complete in both cases. Building works could weaken the structure further.

Remnants of our industrial heritage and their settings such as the reservoirs, dams, canals, embankment of a horse-pulled railway and Roman roads are at risk of being lost or damaged and should be retained and enhanced.

Many dairy and sheep farms would be lost as a result of this development and farm owners have placed their objections. The effect on farming and food production should be considered, in particular Woos Nab Farm which has been a working cattle farm for many years and in the same family for over 100 years. The farmland also supports many forms of wildlife.

Housing in this location will do nothing to regenerate Radcliffe town centre, whereas redevelopment of old mills on brownfield sites in the town will.

Affordable family homes are required in this area, not the executive homes this developer would be likely to provide.

The proposed site is not supported by local employment, therefore leading to out-commuting. Unemployment is currently standing at over 5%, clearly showing that there is no need for additional housing.

Friends of Bury Folk and the Three Arrows Residents Association have placed their objections against the proposal and wish to be kept informed of any discussions. A 'Bury Folk' protest group which has almost 4,000 members has been set up specifically against the proposals for Elton Reservoir but generally against Green Belt loss in Bury as a whole. A meeting was held by the Group on 6 January at the Town Hall which over 200 people attended.

The Environment Agency are working with GMCA to update the Strategic Flood Risk Assessment and expect to see any outputs from this work to feed into an updated policy for this site. Records indicate that there are historic landfill sites within the allocation boundary. In line with other allocation policies and to comply with the NPPF the policy should be amended to take account of the need for detailed ground investigations and remediation if necessary.

Historic England note that the site includes two Grade II listed heritage assets. Any substantial harm to the significance or loss of a Grade II asset and setting should be exceptional. The allocation does not appear to have been informed by any assessment of effects upon the historic environment which accords with NPPF or Historic England's Advice Note 3. Without this the principle cannot be demonstrated and the quantum of development cannot be achieved without harm to the historic environment and would therefore be potentially unsustainable and unsound. Any assessment should be undertaken by an appropriately qualified conservation specialist familiar with the site.

United Utilities highlight that several large pressurised water mains and sewers cut through the site and that there are existing easements which will need to be considered. Consideration must be given to disposal of surface water in the most sustainable way.

Lancashire Wildlife Trust view that some limited development on the site may be feasible but that development on this scale is likely to result in unacceptable biodiversity loss of significance to the City Region. References to new green infrastructure, retention and enhancement of ecological assets and sustainable urban drainage systems within the policy are welcomed, but additional evidence and detail is required in order to comment further. There are 6 Sites of Biological Importance on-site but these are not mentioned and need to be included for clarity and transparency.

City of Trees suggest that Point 7 should specify that multifunctional green infrastructure should be of high quality, both within the site and within strategic areas including being an integral part of pedestrian and cycle routes and public rights of way networks to surrounding areas.

The Canal and River Trust note that the reservoir is currently an operational reservoir (Category B) and that the proposals would require reclassification and upgrades to spillway capacity, the south western dam and goits. A detailed site investigation and a quantitative risk assessment would be required. It is advised that the masterplanning should take account Manchester, Bury and Bolton Canal and any future leisure uses should take into account existing users of the reservoir.

Rochdale Bury Bridleways Association highlight that the policy does not specifically mention equestrian activities and that a Definitive Map Modification Order has been submitted to Bury Council to upgrade to bridleway status. Equestrian issues should be taken into consideration.

Peel Holdings strongly supports the allocation and notes that the site is in a sustainable location that is well-related to the existing urban area, is readily accessible, is suitable for residential development and has no constraints which would present an obstacle to development.

Taylor Wimpey support the removal of the site from the Green Belt and its allocation for residential development as it would assist in the delivery of sustainable development, it does not meet Green Belt purposes and there are no insurmountable constraints to its development and delivery. The land which they are promoting within the wider allocation does not require a new link road and could come forward before the rest of the site. The allocation should not be brought forward as part of a Supplementary Planning Document as this could impede delivery and it should instead be progressed via a policy in the Bury Local Plan.

Rossendale Borough Council note the proposed new Metrolink stop at OA2 and wish to highlight that a previous M66/A56 corridor study, in the context of a proposal to build a stop at Buckley Wells to join the East Lancashire Railway and the Metrolink, found there to be no capacity on the Bury-Victoria route to accommodate new stops. If the stop at Elton Reservoir is feasible then the Council would ask that the above proposal be revisited.

Councillor Roy Walker raises a number of issues, in particular those around highways capacity and notes that egress would not be feasible if all traffic was diverted at Bolton Road, noting that access roads would also need to come from Radcliffe. The proposal for a Metrolink stop is supported providing that car parking is included.

Other issues raised as part of a standard letter from a large number of respondents relating to a number of allocations in the Bury area but not specific to this allocation:

- Bury Council have not communicated the GMSF proposals in a transparent way including how they originated either from residents or developers. Many people are

unaware and therefore the general public have had to raise awareness. This is contrary to Bury Council guidelines in the Statement of Community Involvement.

- The figure of 12,700 new houses in Bury does not accurately reflect the rate of population growth in the area and so this must be recalculated using reliable, up-to-date information.
- Brownfield sites should be considered before Greenfield sites, and more should be done to identify and allocate brownfield sites and derelict buildings and properties.
- Need for innovation in meeting housing requirements, such as building above supermarkets.
- What guarantees are there that developers will build affordable housing and how can we ensure it is genuinely affordable for local people.
- Objection to loss of Green Belt which has health, recreation and quality of life benefits, has local historic importance and cannot be replaced.
- Adverse impact on road networks which are already at capacity and there is no feasible way of adequately mitigating this.
- Significant air pollution from motorways in area, green spaces needed to offset this. Increase in traffic leads to an increase in pollution, adversely impacting on road safety, health and wellbeing and particularly mental wellbeing if no spaces to enjoy being outside in the fresh air.
- Pressure on existing social infrastructure such as schools and doctors surgeries, more information is required on how this will be remedied.
- Loss of wildlife and not possible to mitigate the impact of development if building on Green Belt land.
- Loss of fields and trees which soak up rainwater, therefore increasing flood risk in an area badly affected by the Boxing Day 2015 floods.

Further work is required by Bury Council/GMCA, also raised as part of a standard letter relating to more than one site, to:

- Ensure reasonable steps are taken to communicate these plans to residents including highlighting on local authority websites that these sites are currently in the Green Belt.
- Review housing requirements independently to reassure residents that an actual need is to be addressed.
- Commission an ecological review to assess the impact on wildlife and a mitigation plan which will be transparent about the losses to be suffered.

Other non-site specific issues raised not as part of a standard letter:

- A comprehensive list of brownfield sites is not readily available for public assurance and should be published;
- More intensive use of available land is required such as through the development of apartments.
- Funding per person in Bury is below the national average and so it is doubtful that the infrastructure improvements will be forthcoming.
- Compensation should be given to homeowners suffering financial loss or impacts on amenity.

OA3 Walshaw

Who Responded

There were 1663 submissions to this section. These were from 1550 individuals, 33 couples or other family groups, 23 unknown people (name not supplied/illegible), and Cllr Yvonne Wright.

There were two submissions from developers/landowners:

- Executors of W Heys (High Bank Farm, Walshaw) & P Heys (Owlerbarrow Farm, Walshaw)
- Himor Group Ltd

There were two submissions from other organisations:

- Friends of the Earth
- Greenfield and Grasscroft Residents' Association

Summary of Issue(s) Raised

Objections to Green Belt release which would constitute urban sprawl and would result in the merging of distinct communities with each other which is contrary to national planning policy:

- The Green Belt gives demarcation to the village of Walshaw and risks creating miles of landmass with no identification.
- The site acts as an important green buffer for West Bury which should be retained. The Greater Manchester Green Belt Assessment finds there to be a strong sense of openness and a strong role in checking the sprawl of surrounding villages;
- No exceptional circumstances exist.
- Concerns at the precedent that could be set for further development of the countryside to the west of the village and elsewhere in Bury.

Traffic on local roads is at considerable levels and the Victorian road infrastructure is not suitable to cope with this presently:

- Many roads are narrow, filled with park cars and mini roundabouts;
- All traffic in the area converges onto Bury Bridge and this proposal will only add to that. New highways solutions are required to tackle what is a serious issue, with or without this proposal;
- The Walshaw Cross and Tottington Road/Crostons Road junction are also overloaded;
- Lowercroft Road is full of potholes and its junction with Dow Lane is dangerous;
- An extension of the Metrolink network up to Walshaw should be considered as additional roads or widening will not improve matters.

Concern at the loss of recreation facilities and amenities and detrimental effect on quality of life and public and mental health:

- Dow Lane Recreation Ground is heavily used and enjoyed by dog walkers, families, hikers, fisherman, horse riders and schoolchildren;

- The area between Dow Lane and Walshaw Road is a peaceful backwater enjoyed by local residents who enjoy being close to wildlife and taking advantage of the scenery and long-distance views;
- Parker's Lodges is a recreational fishery.

The allocation is contrary to national planning policy at Paragraph 110 which requires land to be allocated with the least environmental or amenity value. It has Sites of Biological Interest and is Special Landscape Area. These areas must be protected, placing them within a housing allocation is illegal;

In regard to landscape character, the site is the largest and most visible and accessible 'fringe and industrial brook' landscape area and as a result many people enjoy its network of lanes, public rights of way, reservoirs and recreation facilities, particularly school children from nearby schools.

In relation to biodiversity:

- The Site of Biological Importance in the south part of the allocation is an important bird habitat and the waterbodies support frogs, toads and newts. This area should not be destroyed or displaced but extended where possible;
- The Bolholt Lodges chain should be reviewed for its possible designation as an SBI;
- The allocation is home to a variety of flora and fauna and many UK Biodiversity Action Plan wildlife habitats, including rivers and streams, ponds, hedgerows and lowland fen;
- Six species of bat are on site and therefore a bat survey would be required. There are also a wealth of protected birds and birds of conservation concern that have been recorded. The wildlife corridors system should be enhanced and expanded where possible.
- There are records of adder being present which is a priority species under the NERC Act.

Concern at the impact on local services. The proposal will add pressure to Elton High School which has only just been rebuilt. Primary schools in the area are having to turn down applications due to capacity having been reached. Doctors' surgeries are over-subscribed.

Flood risk is an ongoing concern in the area, particularly at Scobell Street following the Boxing Day 2015 floods.

United Utilities highlight that a large pressurised water main and sewers cut through the site and that there is an existing easement which will need to be considered. Consideration must be given to disposal of surface water in the most sustainable way.

The Campaign to Protect Rural England object on a number of grounds including concerns that the proposed Metrolink stop alone will not enable residents to access jobs and other services such as school or training without relying on car journeys.

Lancashire Wildlife Trust view that significant development of this site would sever green-infrastructure corridors running from east to west in two locations. Additional evidence and detail is required to comment further. The allocation would enclose a Site of Biological Importance (SBI) which includes woodland, open grassland, lodges and Marsh Cinquefoil. The policy should include mitigation or compensation to enhance the natural capital of the SBI and any proposal must ensure east-west green infrastructure links are maintained.

City of Trees suggest that extensive high quality green infrastructure should be provided throughout the area as well as in proposed corridors.

HIMOR Group are supportive of the identification of this site as a strategic allocation as it offers an exceptional opportunity to develop high quality housing that forms a logical and natural extension to the existing urban area. The site is deliverable and could be delivered early in the plan period. Amendments to the policy are suggested to ensure the policy is not overly prescriptive in regard to requirements for additional community facilities.

The proposed site is not supported by local employment, therefore leading to out-commuting. Unemployment is currently standing at over 5%, clearly showing that there is no need for additional housing.

United Utilities highlight that several large pressurised water mains and sewers cut through the site and that there are existing easements which will need to be considered. Consideration must be given to disposal of surface water in the most sustainable way.

Councillor Roy Walker asks that Elton Vale Sports and Club and the Elton Vale green corridor are retained as part of any proposal.

Other issues raised as part of a standard letter from a large number of respondents relating to a number of allocations in the Bury area but not specific to this allocation:

- Bury Council have not communicated the GMSF proposals in a transparent way including how they originated either from residents or developers. Many people are unaware and therefore the general public have had to raise awareness. This is contrary to Bury Council guidelines in the Statement of Community Involvement.
- The figure of 12,700 new houses in Bury does not accurately reflect the rate of population growth in the area and so this must be recalculated using reliable, up-to-date information.
- Brownfield sites should be considered before Greenfield sites, and more should be done to identify and allocate brownfield sites and derelict buildings and properties.
- Need for innovation in meeting housing requirements, such as building above supermarkets.
- What guarantees are there that developers will build affordable housing and how can we ensure it is genuinely affordable for local people.
- Objection to loss of Green Belt which has health, recreation and quality of life benefits, has local historic importance and cannot be replaced.

- Adverse impact on road networks which are already at capacity and there is no feasible way of adequately mitigating this.
- Significant air pollution from motorways in area, green spaces needed to offset this. Increase in traffic leads to an increase in pollution, adversely impacting on road safety, health and wellbeing and particularly mental wellbeing if no spaces to enjoy being outside in the fresh air.
- Pressure on existing social infrastructure such as schools and doctors surgeries, more information is required on how this will be remedied.
- Loss of wildlife and not possible to mitigate the impact of development if building on Green Belt land.
- Loss of fields and trees which soak up rainwater, therefore increasing flood risk in an area badly affected by the Boxing Day 2015 floods.

Further work is required by Bury Council/GMCA, also raised as part of a standard letter relating to more than one site, to:

- Ensure reasonable steps are taken to communicate these plans to residents including highlighting on local authority websites that these sites are currently in the Green Belt.
- Review housing requirements independently to reassure residents that an actual need is to be addressed.
- Commission an ecological review to assess the impact on wildlife and a mitigation plan which will be transparent about the losses to be suffered.

Other non-site specific issues raised not as part of a standard letter:

- Bury CCG's decision to close local walk-in centres needs to be taken into consideration.
- Bury's Local Plan previously did not propose Green Belt release. The GMSF should be scrapped and the Local Plan reinstated.
- Bury will lose its local identity and character if it loses its open spaces.
- Bury is proposing to lose 60% of its Green Belt which is disproportionate and is unacceptable.
- Larger sites will not be viable and will take time to deliver, meaning there is a risk that smaller sites will be approved which will not be large enough to deliver the necessary infrastructure.
- These proposals are contrary to stated aims of reducing the need to travel and reducing carbon emissions.

[OA4 Holcombe Brook](#)

Who Responded

There were 216 submissions to this section. These were from 187 individuals, 18 couples or other family groups, 3 unknown people (name not supplied/illegible), no politicians, one developer/landowner (Holcombe Brook Sports Club), and one other organisation (the Environment Agency).

Summary of Issue(s) Raised

Some support for the proposal, providing that any development provides improved access to the motorway to relieve traffic congestion in the area.

Objections received to the loss of Green Belt and countryside at this location which will destroy the character of the villages, their settings. This is not an infill site but is urban sprawl, representing an extension of a long established residential area into Green Belt and could set a dangerous precedent for future development. When the tennis club was given permission there were assurances that no further Green Belt would be released. The club should not have been built on Green Belt land and its existence should not be used as an excuse to develop further Green Belt land.

Residential development will cause harm to the Special Landscape Area and River Valley, which have already been eroded by the tennis club development. The allocation should be extended to the south-east of Hazel Hall Lane to accommodate a large buffer strip which would shield both the housing and tennis club from views to the south.

The site is too small to accommodate 100 dwellings and would appear to be of considerably higher density than those in the area. A diversity of housing stock is already provided in this area. Affordable housing is unlikely to remain so in such an affluent part of the Borough. Both diversity of housing and affordable housing should be better defined.

A number of concerns have been raised in relation to highways capacity, which should be addressed prior to any development:

- Concerns raised that the collective impact on the road network of the proposals at OA4 Holcombe Brook and OA6 Baldingstone will place unacceptable pressure on Junction 1 of the M66 and further exasperating the high levels of traffic on Walmersley Road and Bass Lane at peak times.
- Public transport is poor and expensive.
- Bury Council appraisal documents for the 2 local conservation areas have raised concerns about the weight of current traffic levels. The additional traffic would directly impact on the conservation areas and the lives of local residents.
- The floods at Summerseat in 2015 mean that a key access point over the river between the site and the M66 motorway has been lost and which has never been replaced. Traffic will need to find alternative routes, therefore putting stress on two old bridges which were built prior to motor vehicular traffic.

The assurance within the policy that 'necessary improvements to local highway infrastructure will be made to facilitate appropriate access to the site' will be impossible to achieve. Access into the site is not workable because:

- Longsight Road is already at capacity at peak times.

- It would be irresponsible to allow traffic to leave via Hazel Hall Lane to access Summerseat as it is not equipped for large levels of traffic and Summerseat is already under pressure since the bridge closure.
- Thornhill Road is a cul-de-sac on the adjacent estate and its continuation should be avoided due to increase in traffic, noise, safety concerns and inconvenience from construction.

A large number of comments were received regarding drainage issues on-site and in the locality:

- Much of the site is underwater. The site has poor drainage and is locally known as 'daub hole' (a muddy pit) and has always been natural area for water to soak or stand. Residents are concerned that the policy requirement to introduce sustainable urban drainage systems will not help and could cause flooding elsewhere.
- A culvert runs under properties to the north of the site which now floods during heavy rain, especially since the development of the tennis club.
- There are newts and toads on the site which indicate the level of continuous water soaking.

It is not clear how air quality will be mitigated and this needs to be explained further.

The proposal will cause considerable harm to the open and rural character of this part of the Borough and the nearby Summerseat conservation area, affecting quality of life, and in turn being to the detriment of tourism. The field is used for recreational pursuits and is also utilised as pasture for horses. The site supports hedgehogs which are a species of principal importance under the NERC Act. The hedgerows are a habitat for a variety of wildlife including 8 species of bat and for bird nesting and must be retained. There are features of ecological value on-site including a pond and stream which should be enhanced as part of any proposal, subject to routine maintenance, included within a protected wildlife corridor network and retained as Green Belt. Links should be provided to Kirklees Valley where possible.

There are views expressed that the Holcombe Brook Tennis Club is used more as a social club than a recreational facility and causes blight to the area through noise and light pollution and unwanted advertising. Local residents were promised there would be no further development on this site. The proposal would further erode the character of this area.

The additional residents will place strain on local services including schools and doctors surgeries which are already full. Parking provision at these facilities is inadequate.

Access into the site is not workable:

- Longsight Road is already at capacity at peak times
- It would be irresponsible to allow traffic to leave via Hazel Hall Lane to access Summerseat as it is not equipped for large levels of traffic and Summerseat is already under pressure since the bridge closure.

- The continuation of the Thornhill Road cul-de-sac from the adjacent estate should be avoided due to increase in traffic, noise, safety concerns and inconvenience from construction.

The site adjacent the proposed allocation is a woodland of remembrance and therefore its development will affect the quiet ambience of what is a special place for a lot of people.

Any houses built on the site should be of low cost and preferably pre-fabricated so they are more affordable.

The proposed site is not supported by local employment, therefore leading to out-commuting. Unemployment is currently standing at over 5%, clearly showing that there is no need for additional housing.

The Environment Agency advise that any future development should ensure there is no deterioration of Kirklees Brook tributary and should also seek to positively integrate this natural asset within the wider public realm. Currently the policy makes no reference to the provision of green infrastructure or the protection/enhancement of the natural environment. Therefore this policy should be strengthened to support Policies GM7, GM8 and GM12.

United Utilities find that a water main falls with the site and advise that consideration must be given to disposal of surface water in the most sustainable way.

Lancashire Wildlife Trust comment that the northeast of the site is rushy and wet and may support ground nesting birds. The value of semi-natural vegetation present and possible bird interest need to be assessed, and the policy should require appropriate effective mitigation or if not practicable, compensation. If ponds are present these will need to be retained or compensated for and linked to the wider ecological network.

Holcombe Brook Tennis Club support the proposal as the site is well located, is in proximity to a range of local services and will infill an existing gap between the urban area and the club. The development will have little impact on visual amenity and character of the area as it will be largely hidden from view by the club. The site does little to contribute to the five purposes of Green Belt following the introduction of built development and Hazel Hall Lane provides a logical physical boundary.

Councillor James Daly states that the boundary is incorrect as, whilst the policy outlines the alleged landholding of Bury Council and area upon which houses can be constructed, the local authority only have an interest in half of the site, the rest being privately owned. It is therefore inconceivable that the site could deliver around 100 new homes.

Other issues raised as part of a standard letter from a large number of respondents relating to a number of allocations in the Bury area but not specific to this allocation:

- Bury Council have not communicated the GMSF proposals in a transparent way including how they originated either from residents or developers. Many people are

unaware and therefore the general public have had to raise awareness. This is contrary to Bury Council guidelines in the Statement of Community Involvement.

- The figure of 12,700 new houses in Bury does not accurately reflect the rate of population growth in the area and so this must be recalculated using reliable, up-to-date information.
- Brownfield sites should be considered before Greenfield sites, and more should be done to identify and allocate brownfield sites and derelict buildings and properties.
- Need for innovation in meeting housing requirements, such as building above supermarkets.
- What guarantees are there that developers will build affordable housing and how can we ensure it is genuinely affordable for local people.
- Objection to loss of Green Belt which has health, recreation and quality of life benefits, has local historic importance and cannot be replaced.
- Adverse impact on road networks which are already at capacity and there is no feasible way of adequately mitigating this.
- Significant air pollution from motorways in area, green spaces needed to offset this. Increase in traffic leads to an increase in pollution, adversely impacting on road safety, health and wellbeing and particularly mental wellbeing if no spaces to enjoy being outside in the fresh air.
- Pressure on existing social infrastructure such as schools and doctors surgeries, more information is required on how this will be remedied.
- Loss of wildlife and not possible to mitigate the impact of development if building on Green Belt land.
- Loss of fields and trees which soak up rainwater, therefore increasing flood risk in an area badly affected by the Boxing Day 2015 floods.

Further work is required by Bury Council/GMCA, also raised as part of a standard letter relating to more than one site, to:

- Ensure reasonable steps are taken to communicate these plans to residents including highlighting on local authority websites that these sites are currently in the Green Belt.
- Review housing requirements independently to reassure residents that an actual need is to be addressed.
- Undertake an environmental impact assessment.
- Investigate the impacts on archaeology and ecology.

Other non-site specific issues raised not as part of a standard letter:

- What alternative land has been considered?
- The obesity epidemic is at critical levels and therefore releasing land where people can exercise is counter-productive.
- Bury is an attractive place to live because of its access to countryside and green spaces. Release of Green Belt will drive people out not attract them.

OA5 Seedfield

Who Responded

There were 14 submissions to this section. These were from 12 individuals, 1 couple, no unknown people (name not supplied/illegible), no politicians, no developers/landowners, and one other organisation (Seedfield Tenant's & Resident's Association).

Summary of Issue(s) Raised

Objections to the scale of Green Belt being lost at this location.

Some support for proposal due to it being a previously-developed site.

Increase in residents will place pressure on existing infrastructure and the proposal does not explain how this will be addressed.

Access to the site is very poor via a narrow residential street with limited parking.

The policy states that there will be provision for recreation whilst removing existing provision, the only playing fields in the area, and with no mention of where these will be relocated.

The combined effect of this proposal and the proposed allocation at OA6 Baldingstone will add significantly to congestion already experienced in this area.

There should be more consideration of the following:

- Capacity/impact/traffic flow on A56 and its links with the M66, as it is already heavily congested.
- Capacity/impact on Bury town centre road network and opportunities for public transport links to the town centre.
- Requirements/impact on existing health and education facilities and retail centres.

United Utilities state that a combined sewer exists on-site and that consideration must be given to disposal of surface water in the most sustainable way.

Sport England highlight that there are existing sport facilities at Seedfield and therefore Sport England's exceptions policy must be considered.

Lancashire Wildlife Trust claim that there is evidence from public satellite imagery that semi-natural habitat is present within the allocation area.

Seedfield Tenants' and Residents Association specify additional conditions which would need to be met if the site were to be developed for housing:

- Increased width of carriageway and parking bay provision on Parkinson Street;

- Access from Arley Avenue and installation of traffic lights at the Arley Avenue/Walmersley Road A56 junction to deal with increased traffic;
- Additional recreational facilities to support the extra population and improve their health and wellbeing.

Other issues raised as part of a standard letter from a large number of respondents relating to a number of allocations in the Bury area but not specific to this allocation:

- Bury Council have not communicated the GMSF proposals in a transparent way including how they originated either from residents or developers. Many people are unaware and therefore the general public have had to raise awareness. This is contrary to Bury Council guidelines in the Statement of Community Involvement.
- The figure of 12,700 new houses in Bury does not accurately reflect the rate of population growth in the area and so this must be recalculated using reliable, up-to-date information.
- Brownfield sites should be considered before Greenfield sites, and more should be done to identify and allocate brownfield sites and derelict buildings and properties.
- Need for innovation in meeting housing requirements, such as building above supermarkets.
- What guarantees are there that developers will build affordable housing and how can we ensure it is genuinely affordable for local people.
- Objection to loss of Green Belt which has health, recreation and quality of life benefits, has local historic importance and cannot be replaced.
- Adverse impact on road networks which are already at capacity and there is no feasible way of adequately mitigating this.
- Significant air pollution from motorways in area, green spaces needed to offset this. Increase in traffic leads to an increase in pollution, adversely impacting on road safety, health and wellbeing and particularly mental wellbeing if no spaces to enjoy being outside in the fresh air.
- Pressure on existing social infrastructure such as schools and doctors surgeries, more information is required on how this will be remedied.
- Loss of wildlife and not possible to mitigate the impact of development if building on Green Belt land.
- Loss of fields and trees which soak up rainwater, therefore increasing flood risk in an area badly affected by the Boxing Day 2015 floods.

Further work is required by Bury Council/GMCA, also raised as part of a standard letter relating to more than one site, to:

- Ensure reasonable steps are taken to communicate these plans to residents including highlighting on local authority websites that these sites are currently in the Green Belt.
- Review housing requirements independently to reassure residents that an actual need is to be addressed.

Other non-site specific issues raised not as part of a standard letter:

- Employment areas should be provided to support housing.
- The proposals do not address the chronic shortage of social housing or rising numbers of homelessness.
- Will lead to further land banking by developers.
- Harm to agricultural land used for grazing animals and growing hay and silage.
- Need to tackle the problem of empty homes. Incentives should be brought in such as grants for owners of empty properties.
- Contraction in services provided at Fairfield Hospital and proposals to close walk-in centres.
- The obesity crisis will only increase with the loss of playing fields and Green Belt.

OA6 Baldingstone (Gin Hall and Bevis Green)

Who Responded

There were 397 submissions to this section. These were from 363 individuals, 18 couples or other family groups, one unknown people (name not supplied/illegible), one politician (Councillor Ian Bevan), one developer/landowner (Tetrosyl Ltd), and two other organisations:

- Historic England
- Friends of Walmersley Village

Summary of Issue(s) Raised

Some support for both the employment and housing proposals on this allocation and for growth in this area generally, provided that the identified issues, particularly site investigation and highways capacity, can be overcome.

Objection to loss of Green Belt here as exceptional circumstances cannot be demonstrated and it meets the purposes of including land in the Green Belt. Walmersley is on the edge of a built-up area, any development would lead to it being swallowed up by urban sprawl. Commercial development would spoil the semi-rural character of the area. The proposal is overbearing, out of scale and out of character. Some have suggested that village green status should be sought.

A number of concerns have been raised in relation to highways capacity, which should be addressed prior to any development:

- Concerns raised that the collective impact on the road network of the proposals at OA6 Baldingstone, OA4 Holcombe Brook and OA5 Seedfield will place unacceptable pressure on Junction 1 of the M66 and further exasperating the high levels of traffic on Walmersley Road, Bass Lane, the M66 motorway and on Bury town centre at peak times;
- The increase in industrial related traffic will increase noise and air pollution to an area already suffering from this due to Walmersley Road being an important link road to and from the M66 and to Ramsbottom, and which accommodates a large amount of traffic from HGVs;
- No acceptable point for access to the site and no consideration for road improvements to Walmersley Road to help relieve congestion;

- Junction 1 of the M66 only permits entrance/exit from and to the south and would require substantial work to cope with the extra traffic volumes. As such this would not make the site viable. The layout of Junction 1 means that in order to travel southwards HGVs must go through Shuttleworth on the A56 and roads in that area are already in a poor state of repair due to overuse.
- Access for residents of East Bury to and from the site is also poor as traffic around the Moorgate area and Junction 2 of the M66 at Bury is also often at capacity.

There is no need for additional employment land and therefore open spaces such as this should not be used:

- Employment land in the area, such as at Tetrosyl, has been lost to housing recently and so this decision is short-sighted;
- Gin Hall is unsuitable for development due to its previous landfill use, very little of the site has potential for development and as such the site is not of strategic scale when taking into account all constraints. The site will be difficult to bring forward and is not 'short-term';
- There are much better located vacant and underutilised brownfield sites across the Borough that should be used instead such as Pilsworth, which does not impact on a residential area;
- The proposal will not benefit residents of Bury East as public transport is poor and warehousing jobs are on low incomes. The Freetown employment area should be redeveloped instead.

The requirement for detailed site investigations into ground conditions at Gin Hall is an understatement. Foundation design and ground bearing capacity are of greater concern than remediation, although any work on this should be conducted without delay. The site this has been overfilled and is not level, much of it without proper consolidation.

Bury Council have had previous attempts at building on Gin Hall and independent reports have supported local residents' consistent opposition to it. The concerns of local residents should be taken into account.

Drainage is presently not sufficient in this area. Increased water flow can lead to water running down Walmersley Road and the slip road from the M66, some of which is often polluted being orange in colour. Junction 1 of the M66 is often closed due to flooding.

The proposal would result in the loss of land used by families for recreational purposes, loss of footpaths and would destroy established wildlife habitats at the site for great crested newts, deer, 3 species of bat, hedgehogs, owls and toads. The mill reservoir, its inflow area and wildlife corridors, including that adjacent the motorway should be protected and not form part of the allocation.

The industrial units would cause unacceptable impacts to local heritage and historic character, in particular the Grade II listed building at Baldingstone House which is of

considerable architectural interest, to Baldingstone village and to Nangreaves which is a conservation area overlooking the site.

The Integrated Assessment expressed concerns that Gin Hall could create further commuting with a severely negative impact, and identifies further negative impacts on Green Belt, Heritage and Landscape. It also states that the proposal would encourage access by private car and increase local traffic on a large scale.

Impact on amenity of local residents:

- There are risks to public health from unpleasant gases which will be released into the atmosphere from the landfill, and infestation by rats and flies. The site has produced methane gas previously due to illegal dumping of food waste and is also known to contain asbestos.
- Land displacement and subsidence;
- Fall in property values;
- Significant visual and noise impacts are likely to result, particularly at unsociable hours, which is compounded by the fact that the site holds an elevated position in one of Bury's most scenic and reputable areas. Noise from the motorway is already pervasive and will get worse with this proposal;
- Overspill parking into surrounding residential areas where many homes do not benefit from driveways.

Alternative uses should be considered for Gin Hall, such as:

- Low density residential use with high quality office business park;
- Ambitious leisure development, for which the site has tremendous potential;
- Food growing.

In relation to the proposed residential site at Bevis Green, the following issues were raised:

- Together with the approval on the Tetrosyl site this constitutes overdevelopment of this small site and is unnecessary. Lack of reference to the Tetrosyl approval is disingenuous;
- Access is restricted;
- The site is very close to the motorway and as such will be subject to considerable levels of noise;
- The existing infrastructure at Walmersley Old Road and the A56 is not equipped to cope and there is no feasible way of improving it. Construction traffic will add to the pressure and will pose a threat to safety;
- Impact on social infrastructure such as schools which are already at capacity. There are very few shops in the village;
- The site was originally proposed as recreation land in the planning application for the adjacent Tetrosyl site.

Some concerns were raised over the lack of detail which accompanied the draft allocation and so it is not clear whether roads will remain open for access and whether properties will be demolished to allow this to come forward. No reference was made to planning approvals recently given in the area which are of relevance.

Historic England note that the site includes a Grade II listed heritage asset and comment that the allocation does not appear to have been informed by any assessment of effects upon the historic environment which accords with NPPF or Historic England's Advice Note 3. Without this the principle cannot be demonstrated and the quantum of development cannot be achieved without harm to the historic environment and would therefore be potentially unsustainable and unsound. Any assessment should be undertaken by an appropriately qualified conservation specialist familiar with the site.

The Environment Agency state that any future development should ensure there is no deterioration of Kirklees Brook tributary and seek to positively integrate this natural asset within the wider public realm. The policy presently makes no reference to the provision of green infrastructure or the protection/enhancement of the natural environment, and should be strengthened to support wider GMSF policies GM7, GM8 and GM 12.

United Utilities highlight that a large pressurised water main and sewers cut through the site and that there is an existing easement which will need to be considered. Consideration must be given to disposal of surface water in the most sustainable way.

City of Trees note that high quality green infrastructure needs to be incorporated into development and where possible existing trees need to be retained. Extensive tree planting should take place adjacent the motorway to help reduce noise and air pollution.

Rossendale Borough Council has concerns about the employment allocation at Gin Hall and the potential impact on Junction 1 of the M66 which is already congested at peak times, and which will have knock-on effects for the A56 through Shuttleworth and Edenfield. There has been no assessment of transport impacts to date and the Council would welcome involvement in these discussions.

Tetrosyl Limited support the proposed allocation at Bevis Green as the site represents a natural extension to the scheme being promoted to the south for housing and which previously benefitted from an outline planning permission. The site is unused for leisure, recreation or agriculture and there has never been any public access to it. The site is well located close to good transport links, is in an established residential area and can provide a mix of housing offer to meet needs.

Friends of Walmersley Village strongly object to the proposals which will be ill-considered, unsustainable and will have a detrimental effect on the area and its residents. The proposals, together with the plans to 240 homes on the old Tetrosyl site and at the rear of Christ Church totals approximately 300 homes, creating urban sprawl and overwhelming the local road network.

Councillor James Daly views that Gin Hall should be removed from the GMSF as an allocation as other proposed sites are more accessible and require much less investment to make it acceptable. A new motorway junction would be required at a cost of over £1 million and this would have to be met by the taxpayer. Public transport improvements supported by walking and cycling routes would not be possible as the only feasible route is Walmersley Road which is already congested, creating a dangerous and unhealthy environment. Multi million pound investment is needed to create the extra capacity which is lacking at local schools. In relation to Bevis Green this involves development of a small site originally intended for recreational purposes and which is contradictory to the GMSF's stated aim of developing larger sites.

Rochdale Bury Bridleways Association advise that the bridleway adjacent to Bevis Green should be used for access to the site.

Other issues raised as part of a standard letter from a large number of respondents relating to a number of allocations in the Bury area but not specific to this allocation:

- Bury Council have not communicated the GMSF proposals in a transparent way including how they originated either from residents or developers. Many people are unaware and therefore the general public have had to raise awareness. This is contrary to Bury Council guidelines in the Statement of Community Involvement.
- The figure of 12,700 new houses in Bury does not accurately reflect the rate of population growth in the area and so this must be recalculated using reliable, up-to-date information.
- Brownfield sites should be considered before Greenfield sites, and more should be done to identify and allocate brownfield sites and derelict buildings and properties.
- Need for innovation in meeting housing requirements, such as building above supermarkets.
- What guarantees are there that developers will build affordable housing and how can we ensure it is genuinely affordable for local people.
- Objection to loss of Green Belt which has health, recreation and quality of life benefits, has local historic importance and cannot be replaced.
- Adverse impact on road networks which are already at capacity and there is no feasible way of adequately mitigating this.
- Significant air pollution from motorways in area, green spaces needed to offset this. Increase in traffic leads to an increase in pollution, adversely impacting on road safety, health and wellbeing and particularly mental wellbeing if no spaces to enjoy being outside in the fresh air.
- Pressure on existing social infrastructure such as schools and doctors surgeries, more information is required on how this will be remedied.
- Loss of wildlife and not possible to mitigate the impact of development if building on Green Belt land.
- Loss of fields and trees which soak up rainwater, therefore increasing flood risk in an area badly affected by the Boxing Day 2015 floods.

Further work is required by Bury Council/GMCA, also raised as part of a standard letter relating to more than one site, to:

- Ensure reasonable steps are taken to communicate these plans to residents including highlighting on local authority websites that these sites are currently in the Green Belt.
- Review housing requirements independently to reassure residents that an actual need is to be addressed.
- Commission an ecological review in an accessible format to assess the impact on wildlife and a mitigation plan which will be transparent about the losses to be suffered.

Other non-site specific issues raised not as part of a standard letter:

- There is an urgent need to cater for the ageing population in Bury.
- Bury Council does not have the financial resources to deliver the necessary transport and social infrastructure required to make the proposals acceptable.

[OA7 Southwick Park](#)

Who Responded

There were two submissions to this section. These were the Environment Agency and Friends of the Earth.

Summary of Issue(s) Raised

Drainage: requested that green SUDS are used, with suggested policy wording. There is a combined sewer on the site.

Green infrastructure:

High quality and extensive green infrastructure needs to be built into any new development.

An extensive tree belt should be retained/planted to reduce air pollution and noise pollution from the adjacent motorway

[OA8 Broadbent Moss](#)

Who Responded

There were 34 submissions to this section. These were from 20 individuals, one couple, no unknown people (name not supplied/illegible), and six politicians (Councillor Barbara Brownridge, and Royton South councillors: S Bashforth, A Chadderton, and M Bashforth).

There were four submissions from developers/landowners:

- Grasscroft Homes and Property
- Heyford Developments Limited
- Landowner of land at Mossdown Road, Royton
- The Casey Group

There were four submissions from other organisations:

- Environment Agency

- Friends of the Earth
- Moorside East Residents Association
- The Campaign to Protect Rural England, Friends of the Peak District & the NW Transport Roundtable (single submission).

Summary of Issue(s) Raised

Objection to principle of strategic allocations:

- Development of housing in this area is unnecessary. In recent years the local authority cleared housing in the Derker area and large areas of this housing regeneration scheme are yet to be developed with no signs of activity.
- Strongly oppose to the proposed use of land at Broadbent Moss for the provision of housing or commercial buildings.
- Evidence base in that the projections are mathematically crude and simplistic. Furthermore, the basis of drawing up the framework from sites proposed by landowners and developers suggests a material bias to the whole enterprise - a developer will prioritise the areas which maximise the profit with the least of problems attached; why clean up a brownfield site when virgin green belt land is available.
- No emphasis placed on developer's obligations to provide infrastructure and services.
- Unfairly allocated development sites in the north-west of the borough – should be spread across the borough.
- Concern over lack of employment to accommodate the housing – risk of dormitory suburb and increase in traffic.
- Concern over what 'defensible borders' to the Green Belt proposed in the draft plan will look like.
- It is unclear how the proposed allocation relates to the delivery of the housing requirement set out in Policy GM5, for example the proposed strategic allocations in Oldham suggest that a total of 3,260 dwellings could be delivered however this falls substantially short of the requirement of 13,700 dwellings set out in Table 8.1. It is inferred that further site allocations are to be proposed through individual Local Plans however this is not made clear in the policy wording. Given the complexity of the relationship between the proposed strategic allocations, delivery of the housing requirements and effect on the Green Belt, a table should be provided as a simple reference tool. This should list all the proposed allocations by local authority area, stating the size, planning status and number of dwellings
- Object to the reliance on large Green Belt sites, especially as non-Green Belt alternatives on a smaller scale do exist. At the moment there is no reference to the need to allocate smaller, non-Green Belt sites, in order to meet the housing requirements.

Release of Green Belt:

- Concern about the loss of Green Belt and OPOL. Once it has gone it will be lost forever.

- Totally oppose use of Green Belt and OPOL for housing development unless every other possibility has been pursued by Oldham Council. Brownfield land should be developed first and foremost i.e. Hartford Mill and other mills in the borough; areas in need of regeneration; closed down pubs). Developers should not be given access to Green Belt land before all existing brownfield sites have been developed. Suggestion that more brownfield sites will come forward over the next 20 years.
- Concern of impact of development on character of area, mainly the impact of urban sprawl and measure of separation from neighbouring areas of Rochdale, Royton and Oldham. It will completely change the nature of the community, removing any sense of identify deriving from a measure of separation from neighbouring areas.
- Concern over impact on health and wellbeing as a result of Greenbelt and open space that would be lost in the area.
- Concern over cumulative impact of allowing development on this greenbelt land – meaning all green belt is at risk.

Infrastructure provision:

- Concern over lack of affordable housing on the proposed site – as infrastructure and development conditions would be higher meaning smaller developers squeezed out.
- Concern over impact on existing infrastructure (i.e. schools, shops, roads, health services and leisure facilities) and the additional land required if more were to be built to accommodate the additional population. With the removal of Shaw's leisure facilities and the consistent failure to replace the health centre, how is Shaw able to suitably fulfil the needs of any more residents?
- Concern over impact on existing green space in the area as a result of the loss of the site (in particular Dunwood Park – which is not an area of open recreational space to begin with due to its thick woodland coverage)

Transport / highways:

- How will the additional traffic and site traffic be managed? Concerns about the increase in traffic on Oldham Road, Higginshaw Road, Royton and Shaw Road, Oldham, which are congested at Peak hours.
- Access from the area onto the main roads is a concern, in view of the presence of Warehouses on Beal Lane and the ASDA store on Greenfield Lane. Work would be required on Shaw Road / Cop Road junction.
- Heyside roads are already congested, especially at Peak hours.
- Concern over lack of commitment to public transport and sustainability – especially given lack of local employment meaning area likely to become a dormitory town, for Salford or Manchester.
- Concern over how traffic is to be managed for new and existing residents – how will safety measures be implemented?
- Concern about un-adopted roads down the side and back of properties surrounding the allocation being used as a cut-through.
- It is a huge flaw in the strategy that major investment in infrastructure such as schools, roads and medical centres will attach to the strategic sites but not, as I understand it, to the smaller sites (some not that small) which come in the next stage

of consultation. This must be remedied, and both put on an equal footing. Failure to address this on an equal basis could even be self-defeating as the quality of local facilities affects housing choices.

Green Infrastructure:

- Site would require significant site investigation work due to water courses and historic landfill site.
- Concern over flooding from Beal Valley flood plain from River Roche and Irwell—cites 2015 Boxing Day floods in area and nearby New Hey.
- Concern over flooding of the Metrolink track bed.
- Objection on grounds of site's status as an SBI – where development would have a significant impact on the wildlife and loss of habitats (contributing to a decline in species). The proposed development site contains an area that is designated as having specific value for wildlife and the loss of this land to development will have a negative impact on the wildlife. Loss of wildlife as a result of development on the SBI would conflict the measures and targets set out in the National Biodiversity Strategy for England (2020). Areas that are important for wildlife should be protected from development. The area containing the SBI could be removed from the development area without preventing the majority of the development proceeding.
- Concern over flooding with development on site especially with Global warming increasing flooding events.
- Concern over loss of wildlife, in particular Lapwings (a red list species) which have been seen nesting and feeding in the valley.
- The land is very hilly and boggy, frequently flooding which then spills onto neighbouring homes and roads. The loss of trees and natural ground cover would compound the already poor drainage.
- Includes an area of established OPOL.
- Concern about potential urban sprawl and loss of green gaps between neighbouring towns that is very important for people's quality of life in densely built up areas.
- The lack of green space will put enormous pressure on remaining public space (i.e. Dunwood Park).
- Much of the outer fringe of Oldham and Rochdale beyond the areas earmarked for development is moorland, so far less hospitable as environment and for most leisure users

Flooding:

- Area is known as Royton Moss / Beal Valley Flood Plain for a reason.
- This area is in part in the Beal valley flood plain. Land near the Metrolink is very marshy and full of reeds and rushes. Concern that building in this area could result in flooding in parts of Shaw, downstream from the River Beal and also flood the Metrolink tracks.

. General:

- There are smaller pockets of land in Shaw that could be built on e.g. where the Big Lamp pub used to stand in Shaw; land at Hebron Street; some closed down pubs/ businesses could be converted into residential flats for the elderly (thus releasing their homes).
- Concern over loss of sense of community with the additional thousands of people into the area.
- The sense of place the landscape provides would be lost.
- If the site were to include more affordable housing and provision for elderly there may be some sense of community retained, which would be lost with expensive homes.
- Major concerns of routing alongside Metrolink, ground conditions, concerns of previous chemical contamination (30+ years ago) and access.
- Unlikely to provide affordable housing for Oldham's residents as infrastructure and development conditions are a major challenge for developers and would exclude small developers.
- Area was used for a tipping site during the late 1990's and early part of the 21st Century and requires further site investigation.
- No objection to the principal of the allocation, however, Oldham Council should consider other appropriate and sustainable locations in order to maintain a five year supply of deliverable sites in accordance with the NPPF. The opportunity of small non-Green Belt sites, such as the land at Haven Lane in Oldham, should be referenced within Policy GM25. Smaller sites need to be released in parallel to the larger strategic allocations.
- Employment is to be concentrated in Manchester, Salford and around the airport. Whole areas will become dormitory towns whose populations will commute to far-off areas. This is not consistent with the declared aim of reducing road travel.
- Oldham has long had policies of promoting the use of brownfield sites but its record shows that the developers get their way. If Greater Manchester wants to rely on such promises, it needs to prove it by providing GMSF with some teeth and using them. Possibly some incentives to use brownfield sites could be considered?
- Housing mix needs to be a priority, if communities are to survive as living communities rather than dormitories, and to absorb the extra people who arrive

Comments in support of strategic allocation:

- See Grasscroft Homes/ Houirgan Connelly, Casey Group and Chorlton Planning responses below.

Comments from landowners:

GL Hearn C/O Casey Group:

- Support for the eastern portion of the allocation at Broadbent Moss and to promote land immediately to the north of the site for inclusion (within Casey Group ownership) for a more comprehensive development site.

- Major technical issues have been considered: Flood Risk; Ecology; Landscape; Heritage; Ground Conditions; and Access. High level masterplan has been prepared to illustrate how the additional land could accommodate additional scheme proposals on site.
- Exceptional circumstances for GB release - the site performs weakly against strategic GB function as it is self-contained with defensible boundaries.
- An illustrative masterplan is included that demonstrates that the site could at least accommodate 1,000 dwellings and satisfy 3 dimensions of sustainable development as set out in the Local Plan.
- The site is clearly identified as deliverable being as it is in a single ownership of a willing landowner.

Chorlton Planning Ltd on behalf of landowner Worldwide Recycling & Waste Ltd:

- Support for the inclusion of the site – Land at Mossdown Road, Royton, which is available for early development.
- The preparation of a joint comprehensive plan with the owners around the site will be carried out.

Hourigan Connelly on behalf of landowner Grasscroft Homes &Property Ltd:

- Support for development as the site is not the best and most versatile Green Belt; not subject to any statutory or other designations that would adversely affect development proposals. In particular, the site does not accommodate any local, regional or national sites of ecological importance. A SBI lies further to the south and west but this would not be adversely affected as the majority of the subject site comprises species poor grassland; the majority of small ponds within the site are dried up and avoidance measures could compensate (accompanied by an Ecological Assessment submission).
- The subject site does not accommodate any local, regional or national designated heritage assets. Having consulted the Environment Agency's web site it is clear that the majority of the subject site is not at risk of flooding from any rivers or surface water, however some very limited lower lying areas associated with the River Beal (which traverses the site) are at risk of flooding.
- The public right of way along the Western boundary could be maintained with any development.
- The designation of the site as OPOL forms no purpose and is not justified against the NPPF framework.
- In terms of landscape impact, the subject site adjoins the existing built up area of Heyside and contains strong natural boundaries that would restrict any further development and minimise its visual impact.
- In addition, the site's designation as Green Belt does not mean it is a pristine landscape because as you travel southwards the Green Belt landscape loses some of its coherence due to the solid conurbation anyway.
- There is a clear distinction between that part of OH23 to the west of the Metrolink line and that to the east. Land to the west of the Metrolink line has clear evidence of urban sprawl as is evidenced by the existing and extensive industrial areas accessed from Moss Lane to the south of the subject site. This together with the Metrolink,

Bullcote Lane and the existing built up area to the west means that the subject site has a close physical relationship with the existing urban area and is subsequently well contained resulting in a loss of openness.

- The Metrolink line could act as the western boundary to the Green Belt here with land to the east performing the important role of preventing the merging of settlements.
- In our view land to the west of the Metrolink within OH23 should have been considered separately to the land to the east of the Metrolink.
- The subject site is not considered suitable for employment purposes in market terms for the extensive list of reasons set out in the report prepared by Aherne Commercial Property Consultants (i.e. Lack of access from major roads and motorways, lack of frontage, noise impact, lack of market potential etc.)

Comments from organisations:

GMSF2104 - Planning Specialist Environment Agency:

- We are currently working with the GMCA Planning Team on refining the flood risk evidence base and providing technical advice where needed. The aim will be to produce an updated SFRA at a GM scale and this will review all site allocations. To meet the requirements of NPPF we expect any outputs from this work to feed into an updated policy for this site.
- Support use of sustainable urban drainage systems within this strategic allocation. Recommends that additional wording includes explicit reference to ‘soft’ or ‘green’ SUDS (Suggested wording could be: ‘Incorporate measures to mimic natural drainage through the use of green sustainable urban drainage to control the rate of surface water run-off’).
- Support the policy where it seeks to incorporate existing green infrastructure assets (bullet point 3) but consider this should be strengthened to include the explicit reference to the need to protect and enhance the River Beal and the particular need to naturalise it where possible. Recommends the following wording ‘Protect and enhance the River Beal through naturalisation of this key habitat and provide a corridor of strategic green infrastructure around this feature’.
- Records indicate that there are historic landfill sites within the allocation boundary. Following wording is therefore suggested: ‘Take account of detailed ground investigations and, if necessary, implement appropriate remediation to areas of the site that have previously been subject to landfilling’.
- The area lies partly within a groundwater source protection zone 2 for a public water supply abstraction. We also have record of a number of private supplies in the area. We would expect any planning application for developments within the source protection zone 2 to be supported by a detailed hydrological assessment. This will need to consider the vulnerability of the land and to proposed suitable mitigation measures which will be employed to reduce the risk of pollution of groundwater.

Planning Manager the Campaign to Protect Rural England, Friends of the Peak District & the NW Transport Roundtable:

- CPRE objects to the proposed allocation of this area for development as aside from its Green Belt designation and the large number of public rights of way and recreational routes that cross this land, the majority of the Broadbent Moss area is entirely unsuitable and unsustainable for development.
- The area is of ecological importance, as an important area for peat, ponds and mosses (including the increasingly rare sphagnum moss), part of which is wooded and much of which is subject to flooding.
- The entire area is a flood plain and is designated as OPOL and promises to protect and enhance biodiversity are unfounded.

LDF Planning Manager United Utilities PLC (Operations):

- Water mains and sewers run through the site. Also there is an existing UU easement which will need to be considered.
- Consideration must be given to disposal of surface water in the most sustainable way.
- Site is within a groundwater source protection zone. It is extremely important that applicants engage with UU and the Environment Agency in respect of development in Groundwater Source Protection Zones. Development proposals should ensure they are supported by an appropriate risk assessment that considers any potential impact on the groundwater environment and public water supply in accordance with the position statement produced by the EA entitled ‘Groundwater protection: Principles and practices’. Suggest the following text: United Utilities has highlighted [a number of sites / this site] as being located in Groundwater Source Protection Zones.
Groundwater Source Protection Zones are an important part of the groundwater environment and a source of public water supply. Development within these zones should be in accordance with the Environment Agency position statement entitled ‘Groundwater Protection: Principles and practice (GP3)’.
- The development should be supported by an appropriate risk assessment which considers the impact on the groundwater environment. The development proposals and any mix of uses will be expected to be master planned to minimise risk to the groundwater environment. For example, ensuring potentially polluting uses are acceptable in principle in the location proposed on any masterplan and including greenspace associated with residential development in the most sensitive locations such as adjacent to boreholes used for public water supply purposes.
- Additional protection measures will also be required in some locations, for example, higher specification sewerage pipework for development schemes in Groundwater Source Protection Zone 1.
- Development proposals should be supported by a construction management plan which sets out how the risk to the groundwater environment during any construction process will be managed.

Lancashire Wildlife Trust:

- The Royton Moss SBI lies within the development area. It is an area of degraded lowland raised bog (mossland), now more fen-like in character, from which three species of Sphagnum moss are recorded.

- There is also some neutral to marshy grassland. Reed Bunting and Grasshopper Warbler are features of the avifauna.
- There are additional ponds within the allocation area.
- We propose the following additional policy requirements: ‘Protect the hydrology of the Royton Moss SBI.’
-

City of Trees:

- Extensive high quality green infrastructure needs to be incorporated across the site. This should incorporate green infrastructure based SUDS and ensure the safe pedestrian and cycle routes are attractive and green. Extensive tree belts should be planted adjacent to any major roads.

Shaw and Crompton Parish Council:

- There is no detailed information concerning the availability of Brownfield sites within the draft GMSF document. We should first look to build on the many derelict and the unloved sites in our town centres and districts, convert every empty mill and factory into housing, force developers to build on sites already given planning permission, and bring the large number of empty homes back into use.
- The draft GMSF readily identifies the need for a very significant investment in transport infrastructure. Many of the Strategic allocations are sited near our motorway corridors, ostensibly to take advantage of existing networks. However, 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.
- All the sites identified within Shaw & Crompton are devoid of good vehicular access. The Beal Valley site is currently served only by a narrow road and the desire to facilitate access to this site by enhancing links to Shaw Metrolink Station seem incredulous; the only current access, via Beal Lane, is saturated with existing traffic and HGV movements to and from existing businesses.
- The GMSF does not appear to adequately address available funding to deliver on these requirements. Schools, hospitals, play areas and leisure facilities, shops, health centres, doctors, dentists, etc. - not necessarily new build – must be available as the houses/ employments/ businesses are developed. Expansion of our emergency services will also be required to provide safe communities in the future.
- An important vision of the GMSF is that Greater Manchester becomes as well known for the quality of its environment as for its economic success. Green Belt plays a role in this but there are important green spaces, parks, rivers and canals in the heart of our urban communities which are equally valuable. The protection and enhancement of our blue and green infrastructure is a central theme of the strategy. In view of the above aspiration it is difficult to understand why the specific green sites in Shaw & Crompton have been proposed. All the selected sites are notable attractive open

spaces that provide pleasure, relaxation, and health benefits to local residents as well as our wider community. The sites include public footpaths enjoyed by many dog-walkers, ramblers and walking groups. Many of the Public Rights of Way are important to the historic Shaw & Crompton Boundary walk and Crompton Circuit walks. These locations also provide one of the few opportunities for people to undertake horse riding in safety which is particularly of concern for 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.

[**OA9 Cowlishaw**](#)

Who Responded

There were 316 submissions to this section. These were from 278 individuals, five couples, one unknown person (name not supplied/illegible), Shaw & Crompton parish council, no developers/landowners, and four other organisations:

- Crompton & Royton Golf Club
- Environment Agency
- Friends of the Earth
- Keep Cowlishaw Green

Summary of Issue(s) Raised

Objection to principle of strategic allocations:

- ALL the land allocated for development in the Borough is CONCENTRATED in and around Shaw. The NW of Borough will be OVERWHELMED whilst Saddleworth gets away with only 120 homes.
- There are plenty of BROWNFIELD SITES, OLD MILLS, and EMPTY HOUSES which could and should be used first.
- There are better sites within Oldham like the land between Abbeyhills and Holt’s estates and land near Alexander Park that could be used.
- Shaw has suffered enough: huge modern warehouses over-shadowing our small town for menial, low paid jobs.

Release of Green Belt:

- Destruction of openness of Green Belt.
- Other Green Belt nearby serves much less of a community purpose and should be prioritised over this OPOL which serves a significant community purpose.
- Development on this land will produce urban sprawl between Shaw and Royton.
- When land is awarded a greenbelt status this is a promise to preserve it, and this promise MUST BE KEPT.
- The loss of this open space sets a precedent that opens the door to further housing developments.

Infrastructure provision:

- Lack of jobs to support influx of people - there are none in the area of Royton, Oldham, Shaw except for AGENCY jobs.
- Local schools are already full.
- Lack of public services in area already to support more development e.g. schools, healthcare, dentists, shops, open space, playgrounds.

Health:

- The health centre is unable to cope even though half the Shaw residents have already been relocated to the Royton Wellbeing Centre.
- Lack of local services, particularly health surgeries to support current population, let alone an influx of 640 families.
- There are only two dentists and these aren't accepting new patients as they're full.
- Destruction of natural areas which are so important to the health and vitality of our community.
- There will be no nearby accessible place of natural beauty and serenity for our elderly, young people and children to be in.

Transport / highways:

- Manchester road and Shaw road cannot cope with the amount of traffic now let alone even more traffic.
- Shaw is already a warehouse hub coping with HGVs on limited roads through the town centre.
- HGV traffic in Shaw centre is already heavy, dangerous – Shaw needs to be alleviated of heavy traffic not added to.
- If you build 640 houses that's at least 1300 people, at least 2000 cars - how many routes in and out of the estate will there be? - Not enough to deal with the volume of traffic.
- Concern about additional traffic on Manchester Road.
- Noise and air pollution from additional traffic.
- Increased traffic on already strained transport infrastructure- M60 junctions and roads suffer heavy traffic, public services under strain already cannot cope with more residents.
- Traffic already heavy in the area due to JD Williams, more could cause gridlock.
- Access from Edward Road would be most likely option and would cause traffic disruption due to nearby school and bus route.
- Access for this development would presumably be along Shaw Road, which is already extremely busy being one of the main routes from the Elk Mill retail park towards Shaw and indeed being a route for the many HGVs that travel into Shaw for the warehouses.
- In the last 10 years public transport (buses) have reduced by 50% with some services no longer running at all (i.e.: 20 service) – extra development would not be conducive to sustainability.

- Not close to any train services - Cowlishaw is at least 1km from Shaw station i.e. a bus/car journey away.
- Metrolink is only radial to Manchester; smart motorway upgrade will only have a short-lived effect.
- A 640-house development would need access road. Options on existing roads discussed, with limitations on different roads such as: safety concerns near primary school; narrow, winding roads; interferes with Footpath 53 (part of Crompton Circuit route); limited visibility & capacity; road safety issues of increased demand for right turn out of junction (Cocker Mill Ln). Other options, e.g.: link road from Thornham Rd squeezed between Rushey Fields Farm and Netherstone Estate; or road from Shaw Rd around ex-Diamond rope works and through golf course

Green Infrastructure/ flooding:

- Destruction of site's status as SSSI and loss of species and habitats.
- Waterlogged fields due to poor drainage which poses a flooding risk if houses are developed on the site.
- Waterlogged fields provide perfect habitats for many species of birds, ducks and insects.
- Development would mean a loss of a peaceful wildlife haven with foxes, the occasional deer, 2 woods teeming with birds and 3 Sites of Biological Importance (2 ponds, 1 fen) and it is the source of the River Irk.
- Footpaths including Crompton Circuit - wouldn't be pleasant to walk if they were engulfed by houses.
- Royton Wednesday Walkers use the area on their walks which would be lost.
- Noise and air pollution from additional traffic.
- Introducing housing here would disrupt the natural eco system and environment and make the whole area prone to flooding as there is an underground stream system and natural ponds.
- Drainage would be a major issue, currently rainwater drains off quite slowly although it does currently pool in certain areas, but as this development would sit higher than current housing, there is definitely a flooding risk.
- Loss of trees and ground cover for development would increase flood risk on an already boggy site.
- Roadside drains cannot cope with the increasingly wet weather leading to localised flooding as recently experienced in Milnrow & Rochdale.
- Cowlishaw has been identified as one of only two Landscape Character Areas in the Borough and is the source of the River Irk.

General:

- Concern over loss of green space, sense of community and impact on quality of life.
- Additional loss of green space coupled with recent loss of nearby parks and other open areas to housing.
- Concern over loss of children's play area and wooded area nearby included within this allocation (north of Moor Street).

- Rejection of recent planning application on site for just 125 houses due to the site's status as OPOL – why is this now being considered for even more houses?
- Cowlishaw protected land (OPOL) is at the HEART of the community, greatly appreciated and widely used by people of all ages.
- The value of our home will go down as at present my outlook is of this land and the golf course.
- Consideration should be given instead to improving the quality of existing run down estates and properties in the area.
- Overcrowding.
- Loss of business and employment- The abattoir as a business is not in decline with pre-tax profits averaging Â£1.4 million from 2011-2013. This is a healthy business which would be destroyed with a financial loss to the treasury and loss of valuable jobs in the area.
- Increased crime.
- Kingsway Business Park and Stakehill have empty units so there is clearly no demand for more commercial buildings nearby.
- Threatens Village Green status of some of the allocation.

Comments from landowners

Cowlishaw Residents Green Space Ltd:

- Concern over 'dubious' allocation of site following earlier planning application and subsequent withdrawal submitted on the site last year on the grounds of OPOL only for a much larger proposal for the site to be allocated within these allocations.
- Call for sites afforded no opportunity to put forward sites for protection if it had the 400 requests for such at Cowlishaw could have informed the site allocation process.
- Concentration of sites in the north west of the borough and the combined impact of this on the area. Shaw has already been made a town of warehouses due to the major distribution centre. More housing should be proposed in Saddleworth – topography is not an excuse and can be overcome as it has been before in the borough.
- OPOL is not less worthy than greenbelt and is at the heart of communities on people's doorsteps being greatly appreciated and enjoyed without having to make a car journey. It should be protected more than Green Belt not less by local policy – and the green belt allocations should be reduced if there is no other option.
- Impacts of OPOL development cannot be mitigated e.g. loss of wildlife/ habitats; alleviating climate change; landscape character value; separate function to GB; network of footpaths; green lung in urban area; amenity value.
- Supporting infrastructure improvements are unlikely to be achieved in reality due to lack of function and often lags behind development.
- Significant increase in traffic resulting in Gridlock, adding to the constant stream of HGVs in the local area; even additional improvements would most likely take up more valuable open space.
- Lack of transparency in the draft plan – confusing language, jargon, euphemisms/ mitigations for development.

- Should be re-using the vacant mills, brownfield sites and empty houses and employment land before any valuable green spaces. There is currently enough Brownfield in the borough to accommodate 7000 homes.
- If we lose these 3 OPOLs (Broadbent Moss; Beal Valley; Cowlishaw) the remainder in the borough will amount to a mere 1.67% of the borough. A loss of 17.9% of the currently adopted OPOLs.
- We as owners of this field have no intention to sell having bought it to save it from development not to make profit. Remove from the application.

Comments from organisations

LDF Planning Manager United Utilities PLC (Operations):

- Several sewers cut through the site. Also there is an existing UU easement which will need to be considered. Consideration must be given to disposal of surface water in the most sustainable way.

Shaw and Crompton Parish Council:

- These plans represent a massive and inequitable land grab in Shaw & Crompton with the devastation of our local Green Belt and OPOL (other protected open land).
- New homes should first be built on former industrial Brownfield sites. There is no detailed information concerning the availability of Brownfield sites within the draft GMSF document. Existing planning permissions need to be actioned. We should first look to build on the many derelict and the unloved sites in our town centres and districts, convert every empty mill and factory into housing, force developers to build on sites already given planning permission, and bring the large number of empty homes back into use.
- The draft GMSF readily identifies the need for a very significant investment in transport infrastructure. 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.
- All the sites identified within Shaw & Crompton are devoid of good vehicular access. Cowlishaw 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.
- The increase in population will necessitate provision of additional services. The GMSF does not appear to adequately address available funding to deliver on these requirements. Schools, hospitals, play areas and leisure facilities, shops, health centres, doctors, dentists, etc. - not necessarily new build â€“ must be available as the houses/ employments/ businesses are developed. Expansion of our emergency services will also be required to provide safe communities in the future.

- An important vision of the GMSF is that Greater Manchester becomes as well known for the quality of its environment as for its economic success. Green Belt plays a role in this but there are important green spaces, parks, rivers and canals in the heart of our urban communities which are equally valuable. The protection and enhancement of our blue and green infrastructure is a central theme of the strategy. Â In view of the above aspiration it is difficult to understand why the specific green sites in Shaw & Crompton have been proposed. All the selected sites are notable attractive open spaces that provide pleasure, relaxation, and health benefits to local residents as well as our wider community.
- The sites include public footpaths enjoyed by many dog-walkers, ramblers and walking groups. Many of the Public Rights of Way are important to the historic Shaw & Crompton Boundary walk and Crompton Circuit walks.
- These locations also provide one of the few opportunities for people to undertake horse riding in safety which is particularly of concern for 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 (Cowlishaw and Beal Valley respectively) help to prevent flooding and are attractive features of the two sites. Additionally, the Cowlishaw site is renowned for upwell of numerous local springs and given to serious flooding.
- The area has deep unstable subsoil that will require significant pilings leading to excessive construction costs.
- Cowlishaw and Beal Valley also contain Sites of Biological Importance and these must be retained.
- Shaw & Crompton Parish Council firmly believe that our precious Green Spaces should be protected. The Parish Council strongly advocates that no building on Green Belt or OPOL be undertaken until current issues are resolved for existing brownfield sites, outstanding planning permissions and empty homes. Only when these things have been done should we even consider developing vast tracts of our Green Belt.

OA10 Hanging Chadder

Who Responded

There were 1118 submissions to this section. These were from 1019 individuals, 51 couples or other family groups, seven unknown people (name not supplied/illegible), no politicians, no developers/landowners, and two other organisations; the Environment Agency, and Friends of the Earth.

Summary of Issue(s) Raised

Objection to principle of strategic allocation:

- Inappropriate, out of scale
- Royton received inappropriate amount of proposed housing

- Spoil beauty of the area

Release of Green Belt:

- The purpose of the Green Belt land is to prevent urban sprawl. It benefits both rural and urban areas by protecting agricultural activity and the rural character and offers urban areas open space.
- The Green Belt land separates Royton and Rochdale. The allocation will result in the loss of green gaps and merge Royton with other areas, cause urban sprawl and there will be virtually no green belt left.
- Object to building on Green Belt land. The Council has had disregard to the importance of Green Belt, there are no very special circumstances presented. The council and developers are just going for the easy option.
- There must be other derelict sites/ brownfield sites, mills and areas in need of regeneration (e.g. Werneth) available rather than Green Belt, which are supported by infrastructure. All empty properties should be brought back into use before Green Belt is considered. Planning permissions should be made to be implemented.
- Proposals are concentrated in North West of the borough.
- The attractiveness that is desired and attracts people to the area is the very thing that will be lost. Will drive people out and result in loss of revenue / businesses.

Infrastructure provision:

- Culverts run through the land. The land is poorly drained and boggy. There are already surface water run-off and flooding issues. Development may result in additional flooding.
- Water supply, drainage and sewer systems are already at full capacity and are dated. Properties have suffered with external and internal foul sewerage flooding. UU will have records of the flooding events. Poorly constructed culvert has caused a sink hole.
- Electricity and gas supplies are old, defective and overloaded. Already suffer from localised power cuts.
- Royton's local services are already under pressure.
- Schools are already oversubscribed.
- GPs surgeries, chemists are full and there are already long waiting times (up to 10 days stated) to see a GP. It is difficult to find a NHS dentist
- Hospital waiting list will get longer and health centres will struggle to cope. Oldham Hospital is already in crisis with the closure and resulting additional pressure from Rochdale Hospital.
- Impact on welfare systems and policing.
- Will put more pressure on council's refuge collection.
- Would also result in pressure on shopping facilities, libraries and buses.
- Infrastructure should come first before housing.
- Royton centre is unattractive, dilapidated and ill equipped to absorb extra people, there are a lack of services in the town centre and it is still losing businesses.

Transport / highways:

- Surrounding road infrastructure is already congested, particularly Rochdale Road, which also carries many ambulances. Extra traffic would cause severe problems on main roads and B roads, such as Rochdale Road, Sandy Lane, Fir Lane and Grasmere Road is already a busy short cut.
- . Access to motorway is via the already busy roads.
- Significant problems at junctions already.
- There is no width available to widen roads or add bus routes and nowhere to build alternative routes.
- Will cause problems with access and egress.
- Roads are already in a poor state of repair.
- Extra traffic will cause additional noise and pollution.

- Will affect road safety, particularly for children and older people. Need road safety / speed reduction measures.
- Roads are already full of parked up cars, especially at night time and around schools causing safety issues to children.
- Public transport is infrequent and unreliable. No Metrolink or railway provision.
- Transport links from Royton to the major employment area of Manchester are poor
- On market days and most days the parking spaces are taken in the (Royton) town centre. No additional parking is proposed.
- Development expansion should be concentrated around Metrolink corridors not open countryside.
- The 409 bus service (Royton to Oldham) which would take much of the impact is already oversubscribed and is facing further cuts.
- No direct bus service to Manchester from the Area and the bus services from Castleton road have already been stopped.

Green Infrastructure / Biodiversity:

- Hanging Chadder is home to a variety of wildlife. There are at least two large ponds that offer habitat and adjacent fields are used by migrating geese. Deer spotted recently. Already mutilating wildlife, bees, bugs and birds etc. There are many rare species and natural springs at Hanging Chadder.
- Tandle Hills is a home to wildlife, especially birds.
- Tandle Hills is Oldham's oldest countryside park and is of major historical interest regionally and nationally as it was the meeting place for 18th century radicals protesting against suffrage and economic conditions prior to the Peters Field protests and Peterloo Massacre. It is also home to a monument to mark all the people that died during the first and second world wars and people come here to pay their respects to people that gave their lives to protect our pleasant land.
- Noise and air pollution will impact on Tandle Hills. Will spoil view / landscape from Tandle Hills Park. People travel from far to visit Tandle Hills so will impact on tourism.
- Removal of trees, grasslands, hedgerows and fields for housing and access roads would dramatically impact on ecology.
- There would be the loss of leisure facilities for anglers utilising Tyle Lodge and fish and reptiles would be lost.

- Loss of ecology / farm animals will reduce GI as an educational resource and its crucial contribution to leisure and enjoyment.
- Loss of GI would result in loss of land for walking, ramblers, horse riding, fishing nearby etc., loss of walking / cycle routes.
- In the 1980's the council was improving green spaces to encourage people to take exercise and recreation, now the same councils are taking that away.
- When all the green space is gone where will our food come from?
- Once green space is gone it cannot be compensated for by the odd playground and walkway or a few trees. Green space should be expanded.

Agriculture:

- The area has been farming land for over 100 years. It is poorly drained. Will lose farming land needed for future generations.

Unstable ground:

- The area has a history of unstable ground. Mining took place many years ago and there are deep mine shafts. There is the risk of landslip.

Amenity:

- The outlook to properties on Grasmere Road would be impaired due to steep terrain.
- Views would be spoilt generally for existing residents and wider population / visitors.
- Crime may increase.
- Loss of Greenfield land will result in more dog faeces on pavements.

Topography:

- Large parts of the area are steeply sloped.

Health:

- Would impact on quality of life.
- Does walking/ hiking, places for families to enjoy and keep healthy not matter?
- Noise and air pollution from the development (including construction), loss of green belt and increased traffic would affect health. Living next to a busy, polluting road can have adverse effect on health – increased cases of dementia, heart disease, lung conditions, and mental health issues. This will make Oldham's health statistics even worse.
- Use open space for community enjoyment and tranquillity; to play with friends, run / cross country / orienteering, walking clubs, scout club, dog walking and bike riding.
- Seeing the green space lifts the spirits of people.

General:

- Land to the east of Narrowgate Brow / Fir Lane would have much less impact on local housing but would still affect local services.
- Kingsway is not even half full, there are industrial buildings lying empty nearby Stakehill Industrial Park, Heywood, Bury and other Oldham Industrial Parks. There is not the demand for further commercial developments and these existing premises should reach full capacity first.
- Not delivering affordable housing
- Will destroy the area and the attractiveness of it.
- Paid higher price for property in the Green Belt – will the Council compensate existing house holders or give council tax rebate?
- Will devalue home.
- Part of the land has Village Green status.
- Why has Saddleworth been omitted from allocations?
- No information on demographics of people that will move into new housing. Royton seems to have a disproportionate number of the proposed housing; the housing should be split across the borough.
- Concern over lack of consultation – lack of information and time to respond.

Comments from organisations

Environment Agency:

Support reference to SUDS. Should be explicit reference to soft, green SUDS as they have greater environmental benefits. Records show there are historic landfill sites within the boundary. Therefore recommend use wording “Take account of detailed ground investigations and, if necessary, implement appropriate remediation to areas of the site that have previously been subject to landfilling”.

OA11 Beal Valley

Who Responded

There were 692 submissions to this section. These were from 647 individuals, 26 couples or other family groups, eight unknown people (name not supplied/illegible), Royton South councillors (S Bashforth, A Chadderton M Bashforth), two from developers/landowners (Birshaw Farm, P&D Northern Steels Ltd), and two other organisations: the Environment Agency, and Heyside Cricket Club.

Summary of Issue(S) Raised

Objection to principle of strategic allocations:

- Key assumptions about growth in demand for housing and commercial buildings have been formed prior to Brexit – future population growth is unknown but we do know that Brexit will reduce migration to the UK, leading to a reduction in demand for housing; assumptions must be re-validated

- Unlikely to provide affordable housing for residents of Oldham and could increase demand for local services from people living outside OMBC and moving into the area.
- Beal Valley should be completely removed from the allocations.
- Concern over urban sprawl, with Manchester and surrounding towns over the years becoming a mass of urbanization with a lack of green spaces separating them. Beal Valley remains one of the few open spaces of any consequences within the middle of the borough and should be retained.
- Proposed allocations unfairly weighted towards Royton, Cowlishaw, Shaw and Crompton. Burden should be shared more evenly across Oldham and GM. The Beal Valley development falls within the wards of Royton South, St James' and Shaw within which 79.2% of the development proposed falls upon Green Belt with the rest being OPOL. This green space site between areas which have already been extensively developed providing a necessary natural environment and open views.
- Shaw & Crompton's burden of developable land is reviewed in the context of other available land in the borough. Shaw & Crompton's Green Belt land is hugely treasured by its citizens and there will be strong resistance to these proposals given the points I have alluded to here. It would be sensible were amended proposals tabled in light of this.
- The basis of drawing up the framework from sites proposed by landowners and developers suggests a material bias towards the whole enterprise as a developer will prioritise the areas which maximise profit.
- It is a disgrace that Oldham council intend raping this section of the countryside and seem not to have learned the lesson of the tragic loss of the Rochdale section which can be clearly seen from the Tandle Hill monument, a once beautiful area of open land now nothing more than a wagon park with warehouses that bring nothing but pollution and very few jobs.
- The area around Shaw and Crompton is already saturated with industry and housing. Further development should not be at the expense of the Green Belt area and consideration should be given instead to improving the quality of existing rundown estates and properties in the area.

Objection to release of Green Belt:

- Before any proposals are made to develop Green Belt land, all possible options for brownfield sites must be considered, including those in council ownership. There is no detailed information concerning the availability of brownfield sites within the draft GMSF document.
- Why aren't current brownfield sites being considered? It would be better to use them than remove green belt land; brownfield should be built out before any green belt released. Counted 9 derelict sites along the tram line from Rochdale to Oldham, many close to Metrolink stations, which could be developed first.
- Existing planning permissions should be built out before any green belt land is released (developers are holding back on building to keep demand up and prices high);
- Kingsway is not full and units are empty at Stakehill so clearly no demand.

- Oldham has several mill sites such as Hartford Mill, Maple Mill and Chadderton Mill that could be developed, and which are a blight on the surrounding area. There are many Brownfield sites in the region and derelict sites, old mill buildings and areas in need of regeneration that could be used in favour of our precious greenbelt.
- Travelling by tram from Rochdale to Manchester able to count nine derelict sites, many close to Metrolink stations and therefore ideally located close to public transport links. Potential of specific sites available for development in Sholver mentioned where flats have recently been demolished.
- The green belt here provides recreation and a break in the urban sprawl – development would diminish views across the site and introduce noise and air pollution and reduce quality of life.
- There are no “special circumstances” that would apply to this site that allows development on GB.
- Proposals to provide over 30% of total quota of development proposals on GB is wholly unacceptable.
- BV remains one of the few open spaces of any consequence within the middle of the borough and it should remain; we should keep areas of green belt to assist in dispersing air pollution which is a cause of lung disease.
- Council seem to take total disregard for the whole purpose of the GB.
- The Government frequently pledges to safeguard the GB but in reality is actively facilitating building within what should be a sacrosanct area.
- There is a disproportionate emphasis on building on GB land.
- Should completely remove the GB element from the allocation.
- The greenbelt is vital to preserve the character of each area, their heritage and unique identities.
- The countryside is the one thing we do have to be proud of in terms of Oldham's sense of place. It is nonsensical to take that away in order to replace it with better housing. It makes more sense to improve the visual interest of the area by regenerating the derelict mills, factories and other brown field sites which are blighting the area and causing our residents not to care and love their local area. A list of brown field sites available in our local area has been suggested by our local councillors: former Our Lady's RC High School site; Byron Street School; Thornham Mill; Edge Lane Street; Vine Mill, Middleton Road; Grape Mill, Union Street; Old Police Station site on Park Street; Lyon Mill, Heyside; Land between Radcliffe Street and High Barn Street.
- An important vision of the GMSF is that GM becomes as well known for the quality of its environment as for its economic successes. In view of this aspiration it is difficult to understand why the green sites in Shaw and Crompton have been proposed. All the selected sites are notable attractive open space that provide pleasure, relaxation and health benefits to local residents as well as our wider community.

Infrastructure provision:

- With the removal of Shaw's leisure facilities and failure to replace the health centre, how is Shaw able to fulfil the needs of any more residents? Schools and local health services are at full capacity and struggling to cater for the existing population. Local

hospitals are hugely overstretched with A&E departments in crisis – worsened by the closure of Rochdale A&E.

- The proposed development doesn't consider impact on local infrastructure with no substantial plans for improving roads, drains and sewers, schools, health services and a variety of other needs associated with a vastly expanding population in such a small area.
- There are not enough spaces to build infrastructure.
- The sites are described as “strategic” but infrastructure has not been considered.
- Consultation fails to address local infrastructure.
- A large cast iron sewage pipe runs across the site from Sholver – access would be needed for maintenance and any damage would mean the release of raw sewage and affect toilet facilities.
- Water supply, drainage and sewer systems date from the C19th and are at full capacity; local electricity and gas supplies are old, defective and overloaded (already localised power cuts).
- Concern regarding impact of new development on viability of health and school facilities.
- Concern regarding drink water for the increased population.
- Expansion of our emergency services will also be required to provide safe communities in the future.

Transport / highways:

- The need to create new junctions will impact on road safety as roads are already at capacity and congested. Shaw and Rippenden Rd, which have hardly been upgraded since they were originally built, are used as feeder roads when there are problems with the M62 which has a knock-on effect for the town centre.
- Major concerns of routing along Metro line and access.
- No relevant thought has been given to public transport.
- There is no road which makes BV accessible; Shaw Road and Rippenden Road have hardly been upgraded since they were built.
- Council does not have the finance for new roads.
- Currently, children have to walk down Bullcote Lane, which has no pavement in parts, to access school and to increase numbers will be dangerous. Bullcote and Cop Lane are not wide enough to accommodate extra traffic.
- There is no public transport in place to serve the development. Pedestrians would need to walk to the top of Cop Lane or in to Heyside, which would be impractical for many, especially the elderly, those with young families or the disabled.
- Over the last 10 years there has been an increase in HGV traffic from, for example, ASDA and the recent Yodel Depot providing a notable increase in noise and pollution. Concerns express regarding a further 1,200 people requiring vehicular access together with HGV vehicles and what this will represent in terms of air quality, safety and volume of traffic.
- The water supply, drainage and sewer systems date from the 19th century and are at full capacity. Local electricity and gas supplies are also old, defective and overloaded.
- Beal valley is currently only served by a narrow road and the desire to facilitate access to this site by enhancing links to Shaw Metrolink Station seems incredulous;

the only current access, via Beal Lane, is saturated with existing traffic and HGV movements to and from existing businesses.

Green Infrastructure:

- Totally oppose the use of green belt and OPOL for new housing.
- The landfill site which was supposed to be a golf course has not become a local amenity and is now an eyesore.
- BV is a local wildlife habitat, with several animal and bird species, including birds of prey using the area; these are protected under the Wildlife Act. The site is a green corridor for wildlife and to remove it would threaten species, removal of trees would affect bats who use them to find their way around.
- BV is the nearest area to the town centre with any substantial wildlife and should be protected.
- Object to this development as it affects an SBI – an area designated as having specific value to wildlife and the loss of the land will have a negative impact. This is in conflict with targets for improving status of wildlife and reducing rate of loss of all natural habitats, as set out in national strategies. Areas important for wildlife should be protected from development and the area containing the SBI should be removed from the development area which wouldn't prevent the majority of the development from proceeding.
- Concerns over loss of wildlife in nearby woodland – council has a duty to protect woodland and wildlife under the UK Biodiversity Action Plan.
- Object to loss of valuable, heavily used recreational spaces for the local populace of all age groups to enjoy; disruption of local footpaths and bridleways.
- BV is a green area for the community, local children from low income families do not move from their locality and BV provides a free outdoor facility for dog walkers and families to discover the outdoors. Development would mean taking away a green facility from one of the poorest areas of the borough and replacing it with concrete.
- The loss of these areas mean that residents would be required to drive considerable distance to participate in recreational activities in the countryside. Allowing such areas to remain undeveloped, yet connected to each other, facilitates their use for active pursuits without the need to travel far from transport networks.
- Also used for the benefit of people's health and wellbeing – as well as being educational. Taking away countryside goes against the government's aim of protecting the nation's health. Access to green spaces for young children to play and explore, for people to walk their dogs, to see birds and nature living in their natural habitats are an essential part of healthy minds and healthy living.
- The council has a duty to protect woodland and wildlife under the UK Biodiversity Action Plan.
- Concerns regarding disruption of local footpaths and bridleways.
- The land proposed for development is an area of outstanding beauty and serves as a haven for a great deal of wildlife as well as some of the last surviving parts of Chadderton and Royton's rural past.
- The fields and lanes are and have been training grounds to many of the local Scout groups and other youth organisations in their introduction to flora and fauna and map reading, tracking skills.

General:

- The area proposed could not sustain 900 homes.
- The land is very hilly and boggy and frequently floods (e.g. properties along Bullcote Lane). The loss of trees and natural ground cover would compound the already poor drainage. Roadside drains cannot cope with the increasingly wet weather leading to localised flooding as recently experienced in Milnrow and Rochdale.
- Water run-off from High Moor and Counthill is substantial in wet weather with underground streams surfacing at random on the edge of the valley. An ever increasing pond has also established itself. Development would hinder water flow, encouraging land saturation, landslip and flooding. Properties on Bullcote Lane frequently experience flooding.
- Flash flooding is extremely common following any heavy rainfall as this land can't retain rainfall.
- Loss of trees and natural ground cover would worsen existing poor drainage.
- Development in this area is unnecessary; the council cleared large areas in Derker but there are no signs of these being redeveloped e.g. Acre Lane.
- Site is established green belt and OPOL10 – concerned about urban sprawl and loss of green gaps between neighbouring towns.
- Concerns over ground conditions, previous chemical contamination.
- More housing will lead to increased carbon footprint.
- Concerns over the transparency of the whole process.
- GMSF is poorly written and fails to mention affordable housing, emergency services.
- There is a history of coal mining in the valley; shafts are still apparent and make the area unsafe for building.
- The run off from High Moor and Counthill is substantial in wet weather with many of the underground streams surfacing at random on the edge of the valley or flowing down underground to the river. There is a pond on the site which takes all the rainwater run-off from the fields and acts like a balancing pond; development would increase risk of flooding and destabilisation of the substrate causing land slip.
- There is a large cast iron foul water pipe running across the site from Sholver and access to this pipe is required for maintenance.
- Tipping has led to the establishment of Japanese Knotweed which is spreading (Wilkes Road/Rippenden Road); and disturbance would exacerbate this in the surrounding area. Any private builder should be made aware of the problem and who would be responsible for the removal of this and cleansing of soil? The cost would be prohibitive.
- Although support areas of development, in parts this is an area of bog and the land in question provides a flood soak up. It provides a buffer to the mills of J D Williams etc. and denser housing of Shaw Town Centre. It has some areas of land with natural contours, which do provide a pleasant entry to the old mill town along the Metro route.
- Taking away farmland means we will have to rely on produce coming from elsewhere which increases pollution and takes away farming jobs.
- Pollution in the air from urbanization are proving second only to smoking as a cause of lung disease in adults and the first in children. Substantial areas of Green Belt, such as Beal Valley, should be retained to disperse pollution rather than add to it.

- Building on the Beal Valley would diminish the views from both sides of the valley and the proposed uses would introduce a high level of noise, traffic congestion and air pollution.
- Development would diminish views across the site and introduce a level of noise and air pollution completely at odds with the area.
- The 2016 Oldham Education and Skills Commission made recommendations that to improve its desperate position more skilled workers needs to live and work in Oldham. This is not just about attracting new people to the area but also about retaining existing skilled workers. Recruitment issues mean that there are not enough high quality teachers available in Oldham which in turn leads to poor average pupil outcomes across the borough; this is one of the reasons Oldham has been designated as an Opportunity Area by the Department for Education. Therefore we have to sell Oldham to prospective teachers on its assets, which from experience is its countryside. The very countryside which is proposed to be built upon.
- 16 years after the race riots, Oldham now has a much more diverse ethnic mix; leaders should be doing all they can to appease residents' concerns about social injustice. Whilst Oldham may well need to increase its housing over the coming 20 years and one could argue the GMSF will help to regenerate Oldham, I fear the disproportionate amount of housing to be built on green belt land in particular will further fuel that sense of inequity. It is not fair that we live in a deprived area and we are standing to lose a higher percentage of our green belt land than more affluent areas elsewhere. Feelings of injustice lead to social unrest rather than harmony and I fear about the culture in which our children will be raised.
- Hard-working Oldhamers whose properties are close to the proposed development sites will lose substantial equity in their homes as house prices tumble. What message does this send to those who have worked hard to develop homes that they are proud of, only to have their views, light and indeed land threatened by the encroachment of the proposed developments?
- In point 1.1.3 [2] planners seem to suggest that green spaces etc. are equally valuable to green belt. I refute this claim and I take offence and being told what I am supposed to value. This is a matter of personal judgement and I do not recall being asked by planners what I think would make Oldham a better place to live and work. I believe, through experience, that our local green belt land has a much more powerful impact on perceptions of contentment and should be protected.
- Point 1.1.6 [4] claims that the developments will transform the health and wellbeing of our populations. This claim is hard to believe when proposals will reduce access to open countryside, which is regularly used by local residents to get fit. Why make it harder for people to live the healthy lifestyles that can actually remove the need for medication? Surely getting rid of Oldham's most precious resource will, down the line, lead to an increase in obesity related illnesses and mental health issues which is a false economy. This strategy is not the way to preserve our beloved NHS. We are a town blighted by poverty and the links between poverty and poor health means we have to do all we can to safeguard Oldham residents access to local countryside.

Comments in support of strategic allocation:

- Areas of Beal Valley could be developed especially at the Shaw/Crompton metro end, which at present is semi-industrialised with an eyesore of scattered metal/ironwork stock/scrap yard, which doesn't provide much employment.

Comments from organisations:

Environment Agency:

- EA are currently working with AGMA on refining flood risk evidence base and providing technical advice; an updated Strategic Flood Risk Assessment for GM will review all allocations – this will inform an updated policy for this site.
- Support reference to the use of SUDS but would recommend additional wording to comply with GMSF policies GM18 (Flood Risk) and GM25 (Allocations) to make explicit reference to soft or green SUDS, which have greater environmental benefits over engineered options. Suggested wording: *incorporate measures to mimic natural drainage through use of green sustainable urban drainage to control the rate of surface water run-off.*
- Support reference to incorporating high levels of green infrastructure and landscaping but should be strengthened to include explicit reference to need protect and enhance River Beal and to naturalise it wherever possible. The waterbody is designated as heavily modified and has a moderate status under the objectives of the Water Framework Directive (therefore currently failing to achieve its overall objective). To ensure allocation supports GMSF PolicyGM12 (River Valleys and Canals) the following wording (or similar) is recommended: *Protect and enhance the River Beal through naturalisation of this key habitat and provide a corridor of strategic green infrastructure around this feature.*
- EA records show several historic landfill sites within the boundary and recommend additional wording in the form of: *take account of detailed ground investigations and, if necessary, implement appropriate remediation to areas of the site that have previously been subject to landfilling.*
- Area is underlain by bedrock of Pennine Lower Coal Measures Formation – these are designated as capable of supporting local water supplies and sources of base flow to rivers; also partly within a groundwater source protection zone 2 for public water supply and has several private water sources. Any planning application should be accompanied by detailed hydrological assessment – to consider vulnerability of the land and propose suitable mitigation to reduce risk of pollution to groundwater.

Heyside Cricket Club:

- We have over 1500 members, with 500 active members and have plans to expand and enhance existing facilities, including more multi-sport facilities which will have huge community benefit. The cricket club has aspirations to expand and enhance the existing facilities, possibly including more multi-sports facilities, which will have a huge community benefit and support. Land identified for expansion is around Heyside Cricket Club and falls within the Beal Valley designation. It is imperative that landowners work together to deliver the objectives of the allocation and the club's ambitions. This will significantly strengthen the club as a community asset. Support

the GMSF generally and accept the need for new homes and employment and that some Green Belt will need to be released but that non-GB and brownfield land should be phased first for development.

United Utilities:

- A pressurised water main and sewers cuts through the site and there is an existing UU easement which will need to be considered.
- Consideration must be given to disposal of surface water in the most sustainable way.
- The site also falls within a groundwater source protection zone, as such there is a need to engage with UU and the Environment Agency in respect of any development and ensure they are supported by an appropriate risk assessment that considers any potential impact on the groundwater environment and public water supply in accordance with EA's position statement. In line with this UU have suggested the following text: United Utilities has highlighted [a number of sites / this site] as being located in Groundwater Source Protection Zones. Groundwater Source Protection Zones are an important part of the groundwater environment and a source of public water supply. Development within these zones should be in accordance with the Environment Agency position statement entitled 'Groundwater Protection: Principles and practice (GP3)'. The development should be supported by an appropriate risk assessment which considers the impact on the groundwater environment. The development proposals and any mix of uses will be expected to be masterplanned to minimise risk to the groundwater environment. For example, ensuring potentially polluting uses are acceptable in principle in the location proposed on any masterplan and including greenspace associated with residential development in the most sensitive locations such as adjacent to boreholes used for public water supply purposes. Additional protection measures will also be required in some locations, for example, higher specification sewerage pipework for development schemes in Groundwater Source Protection Zone 1. Development proposals should be supported by a construction management plan which sets out how the risk to the groundwater environment during any construction process will be managed. Early engagement with the relevant agencies and United Utilities is strongly recommended where development is proposed in Groundwater Source Protection Zones.

Lancashire Wildlife Trust

- Additional policy requirements are proposed as follows: 'Given the allocation sites importance for wading birds, proposals for green infrastructure must contain adequate provision of and arrangements for management of suitable habitat for these species. Simply retaining the Shaw Side SBI is unlikely to be sufficient to maintain the local populations of these species, which are sensitive to human disturbance and to changes in hydrology and land management.'

City of Trees:

- Item 3 should specify that landscaping and green infrastructure should be of high quality.

Shaw and Crompton Parish Council:

- The Parish Council strongly advocates that no building on Green Belt or OPOL be undertaken until current issues are resolved for existing brownfield sites, outstanding planning permission and empty homes. Only when these things have been done should we even consider developing vast tracts of our Green belt.

Comments from landowners:

Pegasus Group on behalf of P&D Northern Steels conditionally support the proposed strategic allocation subject to the following considerations relating to phasing, access and masterplanning:

- Northern part of the site should be developed first – it is not within the GB, is flat, is part of an existing employment area, is subject to extant planning permission for 80 dwellings, is sustainable and accessible and the risk of flooding can be managed.
- Supporting policy text should state that the operational P&D site is brownfield land, falls within existing urban area of Shaw and benefits from planning permission.
- It is more sustainable than the southern part of the allocation and important that the overall site is considered comprehensively in the masterplanning of the wider allocation and no PP should be given to the GB element before this is done – needs to be a specific reference to a masterplan with the priority phasing being the previously developed land first (consistent with NPPF). This is with the exception of additional areas coming forward early on if it would assist in facilitating development e.g. new highway infrastructure, services, and utilities.
- Policy needs to emphasise that a comprehensive masterplan including involvement from all main landowners is provided at an early stage in the delivery of the site.
- Should be made clear that the existing permission does not require direct infrastructure investment except for open space contributions (policy text should be amended to reflect this).
- Access points to the northern part of the site could and should be made through the southern part and provide direct access onto Oldham Road to create a looped access system which would also benefit emergency, waste and commercial vehicles. This should be provided within the first phase of development and set out in the masterplan (policy text should be amended to reflect this).
- The sustainability of the site largely comes from the northern part of the site; this part is only 300m from metro stop, not 800m – should be corrected. To deliver the connectivity throughout the whole site / allocation, it will be fundamental to ensure that the site is subject to comprehensive masterplanning, with the involvement of all main landowners.
- Topography needs to be identified as a separate and specific issue. If the site is to accommodate anywhere near 900 dwellings there will need to be a major cut and fill exercise across the southern body of the site. This highlights again the need for all

landowners to work together so that the site capacity can be met in full whilst addressing site constraints.

- Object to protection and enhancement of Shawside SBI. Policy text should be amended – it is small and relatively low grade and improvements to biodiversity across the site will offset any impact on this. Aspiring to a net gain in biodiversity across the site would be more beneficial than rigid protection of one SBI.

Chorlton Planning on behalf of Jenorah Ltd:

- The site is available for early development and we will work on the preparation of a comprehensive plan together with the owners of the land to the north near Shaw town centre and to the south near to Bullcote Lane.
- We intend to work with the other landowners to produce a master plan for the development including vehicular and pedestrian access, drainage, land remodelling, where necessary, and phasing.

Grasscroft Homes and Property:

- Our submissions in relation to Beal Valley are simply to highlight that the subject site (OA8 Broadbent Moss) could come forward for residential development independently of this proposed allocation for some 900 new homes. In terms of the quantum of development proposed at Beal Valley it is clearly incumbent on the GMCA to demonstrate that this level of development can actually be achieved here in order for the proposed allocation to be found sound.

[OA12 Robert Fletchers](#)

Who Responded

There were 126 submissions to this section. These were from 101 individuals, four couples or other family groups, no unknown people (name not supplied/illegible), Cllr. Neil Allsopp, Saddleworth Parish Council.

There were two submissions from developers/landowners:

- Tanner Brothers Ltd, the owners of Waterside Mill (re land not used for business centre)
- White Oak Ltd & Hollowoak Ltd (owners of Robert Fletcher Paper Mill & associated sites).

There were ten submissions from other organisations:

- Diggle Community Association
- Dovestone and Chew Valley Action Group
- Environment Agency
- Friends of the Peak and CPRE South Yorkshire (single submission)
- Greenfield and Grasscroft Residents Association
- Historic England
- Natural England
- Peak District National Park Authority
- The British Mountaineering Council

- The Campaign to Protect Rural England, Friends of the Peak District & the NW Transport Roundtable (single submission).

Summary of Issue(s) Raised

Robert Fletchers Comments/ Objections

Principle of strategic allocations

- Plans for the allocations have not been reviewed publically and are against the principles of Localism.
- No trust locally that brownfield sites have been prioritised over the ‘more profitable’ Greenfield land.
- Inconsistency within the proposals – contrasting themes/ policies.
- Robert Fletchers allocation is contrary to the thematic policies within the plan.
- The proposal pre-empts the emergence of a Neighbourhood Plan which will address the best use of the site itself.
- Housing proposed could be spread across smaller sites in the Saddleworth area.

Release of Green Belt

- Unclear whether Fletchers Mill is to be taken out of the GB or not.
- The proposals will lead to encroachment.
- Statement that the Mill and surrounding land forms a major developed site in the GB is not true – brownfield land constitutes less than 15% of the proposed development area.
- The most recent GM Green Belt Assessment rates this part of the GB as one of the strongest in GM in fulfilling the aims of GB – should not be allocated.
- The parcel plays a key role in the setting of the Greenfield Conservation Areas – damage to the character of the site is not justified by the small number of houses it would provide.

Infrastructure Provision

- Small number of proposed units is not going to be enough to fund any significant infrastructure facilities.
- Additional pressure on already stretched facilities and services in the village.
- There is a lack of information on infrastructure provision for the area set out within the proposals or the GMSF as a whole.
- The other leisure facilities that would be required to support the development would further impact the character of the village.
- The existing drainage system in the area is already under significant pressure.

Transport and Highways

- Lack of information on encouraging sustainable transport.

- The access to the site is inadequate – too narrow, lacks safe pedestrian access, susceptible to poor weather/ ground conditions.
- The roads around Greenfield are already narrow and unsafe and under pressure.
- Further land required to improve access to the site would further damage the area.
- The rural setting means people would have to drive especially as poor levels of public transport services in the area.
- Increased levels of noise and air pollution.
- Nature of proposed housing means residents would be less inclined anyway to use public transport.
- The site is not well connected to the Motorway network.
- The train services and parking facilities at Greenfield station is already oversubscribed and inadequate.
- Development would further impact local parking issues (Bradbury Lane).
- Access for emergency vehicles in the area is already difficult due to parking and traffic pressures.

Green Infrastructure

- Concern over proximity of the development so close to Dovestones reservoir – damage to the setting of the South Pennines Moor SPA and SAC located less than 1km away.
- Impact of the development/ increased tourist pressure on the wildlife of the SPA and SAC, in particular the impact on nesting birds at the RSPB reserve there.
- Increased risk of moorland fire as a result of further development in the area.
- The SBI adjacent to the site would be negatively impacted by development.
- Negative impact of the development on the ecology of the mill pond and adjacent river.
- The loss of woodland, flora and fauna to accommodate development would severely impact on Greater Manchester's Green Infrastructure network - at contrast with aims to enhance this within the GMSF.
- The distinctive characteristics of the site (marshland, woodland, inhabited ponds) would be completely lost.
- Some woodland on the site is covered by a blanket TPO which would be lost.
- The development would negatively impact on the recreational use of the Dovestones area, which have a positive impact on physical and mental health.
- The development site is toxic and unsuitable for human habitation and developers are unlikely to clear the site effectively.

Flooding

- Flooding is already increasing in Saddleworth (numerous events in recent years) – development of the site would increase the risk of flooding further.
- The site is already a high risk flooding site due to the remote, yet catastrophic consequences of the failure of the Dam at Dovestones.

Heritage and Landscape

- Concern over impact of development on the adjacent Green Belt and one of Oldham's key heritage sites – The Huddersfield Narrow Canal.
- Negative impact on the view from the recreational routes around the valley – e.g. Oldham Way, Pots and Pans, Holmfirth Road, Alderman slopes.
- Harm to the character and attractiveness of Dovestones Reservoir as a tourist attraction.
- Severe damage to the historic and attractive landscape of the area.
- Damage to the character of the landscape as the entry to scenic valleys in the Peak Park.
- The damage to the character of the strategic rural site would significantly outweigh the benefits of the number of houses proposed.
- Cumulative impact of development on the unique landscape and character of the Saddleworth area.
- The site would be highly visible from all directions having an urbanising effect to the scenic landscape of the valley bottom.
- Loss of the landscape as a peaceful and scenic location beneficial to human health.

Type, scale and mix of housing

- The proposed executive homes would do nothing to alleviate the demand for affordable housing or homes for the elderly in the borough.
- Holiday homes should not be included in the allocation as they provide seasonal residents/ benefits.
- The proposals are exclusionary - not providing a mix of dwellings for all types of people, especially affordable homes to maintain young people (an issue in the area).
- Development of the former mill site may be appropriate but the additional Greenfield land should not be built on.

General

- The site would become a poorly connected dormitory town to Manchester due to the lack of local jobs and the type of people the houses would attract.
- Lack of open space proposed within the allocation.
- Crime would increase.
- A more appropriate use of the site would be as the location of the new Saddleworth School.
- The site should accommodate local employment in knowledge intensive industries – which the Saddleworth population is well equipped for.
- Any tourist development should be limited to the brownfield areas of the site and aimed at improving the Dovestones attraction.
- There is no need for additional holiday accommodation in Saddleworth.
- The contamination constraints stated about the site is untrue and is a way of supporting the executive homes which increase developer's returns.
- Impact on quality of life of Greenfield residents.
- Development would increase the pressure on amenity at Dovestones at busy times.
- The holiday lodge proposals would not improve the visual amenity of the area.
- Mixed-use alternatives would be encouraged.

Comments in Support

- Support for development of the mill site/ other brownfield sites (in particular a mixed development).
- Support for allocation – but only if an assessment of the impact on local infrastructure is carried out and published for public scrutiny and any improvements deemed necessary are completed prior to development.
- Saddleworth Parish Council supports some development on the site (particularly the Brownfield Mill site) to contribute to housing need – but development should be shaped by local community and NDP.

Comments from organisations

- Environment Agency:
 - Recommends that an updated Strategic Flood Risk Assessment feeds into a review of the allocations at the next stage.
 - Recommends additional wording that includes reference to soft or green SUDS; and the need to protect and enhance Chew Brook as an environmental asset.
 - Redundant water structures would need to be removed or adapted to undo the damage of historic industrialisation.
- Peak District National Park Authority
 - Site allocation is not well connected and represents an unnecessary release of Green Belt.
 - No reference within the proposals to removing the Mill site from the GB boundary – inappropriate development in GB.
 - The site is unsuitable due to its value as open space; lack of sustainable transport linkages and not completing to regeneration initiatives.
 - Development would have a negative impact on the landscape and character of the valley bottom as an entry to the Peak Park and Dovestones reservoir.
 - Housing on the site would not enhance or compliment the site's opportunities for leisure and tourism provision.
 - Inspiration and escapism that the site currently offers would be lost and quality of life affected.
 - Landscaping and design cannot ameliorate the impacts of development – development is simple in the wrong place.
 - The scale of the housing proposed would not be in keeping with the local area or the characteristics of the Peak Park.
 - Mixed use development of the Mill site may be appropriate in lieu of the current proposals.
- Greenfield and Grasscroft Residents Association and Dovestones Chew Valley Action Group (DCVAG):
 - Very similar concerns as above.

- Plan for the site at odds with policies/aims of GMSF and throws away a great deal of irreplaceable value, heritage and strategic potential for expediency and profit.
- Natural England:
 - Site allocation policy needs to recognise the presence of the SSSI, South Pennine Moors SPA and SAC and development should have no impact on these designations at the site.
- United Utilities:
- Consideration should be given to the sewer running through the Brownfield part of the site and the sustainable disposal of surface water.
- Historic England:
 - Allocation has not been informed by any assessment of effects of the development on the historic environment (the 2 listed heritage assets on site, and the adjacent conservation area) and so cannot demonstrate development can be achieved without harm.
 - So, allocation is potentially unsustainable and unsound.
 - Assessment needs to be undertaken by a conservation specialist familiar with the site.
- Lancashire Wildlife Trust and City of Trees:
 - Built design should be driven by the biological environment incorporating green infrastructure and high quality design and landscaping, not just the physical and chemical environment as the proposal is at present.
- Saddleworth Parish Council:
 - Want to see some development on the site but object to the current proposal on grounds of landscape impact; harm to tourism and leisure assets; damage to the Green Belt; Flood risk; inadequate infrastructure provision; traffic and congestion.

[OA13 Bamford/Norden](#)

Who Responded

There were 280 submissions to this section. These were from 233 individuals, 22 couples or other family groups, three unknown people (name not supplied/illegible), Cllr Michael Holly, Cllr Peter Winkler, one developer/landowner (Peel Group).

There were six submissions from other organisations:

- Bamford Green Belt Action Group
- Bridge Junior Football Club
- Environment Agency
- Historic England
- Rochdale Tennis Club
- The Campaign to Protect Rural England, Friends of the Peak District & the NW Transport Roundtable (single submission).

Summary of Issue(s) Raised

Principal of Development

- There is no need for additional housing in this area. It's already become overdeveloped over the past few years.
- Should be focusing development on the Town Centre instead.

Release of Green Belt

- Development of this site would result in the loss of the only green space, described as the ‘lungs of the area’, within this area. This Green Belt land provides the only break in the built up area and its development would result in the urban areas of Rochdale and Bury merging together and will destroy the character of the area.
- Rochdale (especially the Town Centre) has many brownfield sites which should be considered and developed first, before any Greenfield and Green Belt sites are considered.
- Release of this area of Green Belt is contrary to National Planning Policy.

Transport/Highways

- Existing roads are already struggling with current traffic and will not be able to cope with the additional traffic created by the additional housing.
- Norden Road is heavily congested which causes serious delays for essential traffic to and from the Accident and Emergency Hospital.
- The council are already struggling to maintain the existing roads which are frequently full of potholes. New developments need to use sites that can readily hook into the existing transport infrastructure.
- The heavy traffic causes issues for the road safety of cyclists. Increased development in the area has resulted in increased traffic with no improvement to, or additional provision of cycle lanes.
- Increased traffic will increase the danger to adults and children crossing the road near the school.
- The existing roads would probably have to be widened which is currently not possible. This would result in the CPO of existing properties.
- The use of alternative transport is not viable due to the distance to existing public transport. The area is not supported by the Metrolink. Further, the existing public transport in the area cannot cope with current demand. The nearest tram stop is in Bury and the bus service is infrequent. The growing population resulting from the development of this site will put additional pressures on these already overcrowded services and it will not be able to cope.
- The GMSF states that any development on the proposed strategic allocations will collectively fund the required infrastructure and will this be reflected in any land value assumptions that are considered acceptable in viability assessments. Who decides the land values and how will this be guaranteed?

Social Infrastructure

- The local social infrastructure cannot cope with the increased population resulting from this development. The local schools, dentists and doctors are already oversubscribed and unable to cope with the current demand.
- The proposed allocation does not fully consider the impact on these services. Improvements need to be made to social infrastructure before any new housing is built.

Health, wellbeing, community and heritage

- Development of this site would result in the loss of an extensive sports facility which is well used by the local community and provides a local amenity.
- The site currently provides a cricket pitch, tennis courts, numerous football pitches and it curtails the opportunities for people from this area to walk, run, cycle and horse ride.
- The football pitches have received funding from the lottery and Sports England on the bases that the pitches will be there long term.
- Where will the pitches be relocated to? Why can't the proposed new housing go on the land to be used for relocating the pitches?
- This provides a community facility which positively contributes to the health and wellbeing of residents and especially children and tackling child obesity, which is currently a big Government issue.
- The mental health of residents will be affected when existing residents are hemmed in by closely packed houses.
- The site is of great importance to the heritage of or area and should not be disturbed.

Green Infrastructure/Biodiversity

- The proposed development would be detrimental to the wildlife in the area and would eradicate irreplaceable habitats.
- The ground in this area is very poor and consists of clay and sand. Development of this site could affect the water table and other natural defences, resulting in flooding.
- The site already suffers from flooding in heavy rain.
- Households in the Spring Bank area already suffer from sewage run off because the drains are unable to cope with heavy rain since the building of the houses at the top of Clay Lane. There has been no improvement to drainage and floodwater infrastructure during recent developments in the area, which has already increased the risk of flooding in the area.
- The additional traffic will increase the carbon footprint in the area, creating higher pollution levels resulting in poorer air quality, which incidentally is contrary to the governments overall objectives on greenhouse gases. The area is also going to lose huge amounts of CO₂ consuming and oxygen generating plants and trees which is furthering the greenhouse and climate change problems. A full Carbon Assessment should be carried out for the site.

General

- The proposed density of houses on the site is unacceptably high and not consistent with surrounding housing developments.
- There are no jobs available in Rochdale to accommodate the new population moving into the proposed houses. The residents moving in will be commuting to Manchester City Centre for jobs, therefore this will not help Rochdale's economy grow.
- The allocation proposes the development of executive homes, which would not be affordable to most people.
- The site has pylons located on it which surely would not be suitable for housing.
- Resident suggests that the land nearer Bowlee and Middleton Road which has quicker motorway links plus access to Heaton Park and is closer to Manchester where most people work would be more suitable.
- I should like clarification on what mandate Cllr Farnell (Rochdale Council) has to engage in and reach agreements upon a plan of this type and magnitude? There are many people in Rochdale who are totally unaware of this and therefore there is an indefensible lack of information and consultation available. For this, someone is responsible and needs to be held accountable!
- The proposals for this site are contrary to the policies set out in the GMSF.
- Where appropriate, Mayoral Development Corporations and compulsory purchase orders will be used to ensure the effective delivery of allocated sites. What mandate will MDCs have to ensure this is delivered and what steps will be taken to consult effected communities?
- Overpopulation of the area will have a negative impact on house values.
- There has been very little publicity regarding these plans, many people who live locally in Norden have been made unaware of the proposal even though it will have a direct impact on their lives & homes.

Comments from organisations

Rochdale Tennis Club and the Rochdale Lawn Tennis Ground Ltd – The tennis club (along with the cricket club and football pitches) provides the most important community recreation facility in Bamford Road. These facilities cannot be adequately replaced elsewhere as there are no suitable locations. They have recently invested major funds into upgrading 3 tennis courts in 2014. The club is in no position to relocate and finance the building of a new club at a new location. The tennis club, cricket club and football pitches should be completely removed from the site boundary and not included in any proposals.

Environment Agency – There is no reference to the use of sustainable urban drainage systems within this strategic allocation. To comply with GMSF policies GM18 (Flood Risk) GM25 (Allocations) we would recommend that additional wording includes reference to soft or green SUDS. Green SUDS have greater environmental benefits over hard engineered options (e.g. underground tanks/pipes). Suggested wording (taken from other Allocation policies) could be: 'Incorporate measures to mimic natural drainage through the use of green sustainable urban drainage to control the rate of surface water run-off.'

CPRE - This land is currently operational farmland, with part used as playing fields where local children play sport weekly. The area is used for a range of recreation and leisure activities including walking, cycling and horse-riding. The site is earmarked for 750 executive homes at a low density. CPRE queries whether the associated high skilled jobs are being created locally? If the answer is no then these houses will support commuting patterns to further parts of the conurbation, which is unsustainable. CPRE is concerned about the site sustainability as public transport to the site is poor. The site has drainage issues, which could cause flooding risks. For these reasons this is not a suitable site to be released from Green Belt.

United Utilities:

- Suggested text to be added to allocation: '*the development of the site will be expected to incorporate Sustainable Drainage methods in accordance with national and local standards. Any drainage proposal will be expected to be part of a site wider strategy to avoid piecemeal development and demonstrate how the site delivers sustainable drainage as part of interconnecting phases. Applicants wishing to discharge to public sewer will need to submit clear evidence demonstrating why alternative options are not available. Approved schemes will be expected to be supplemented by appropriate maintenance and management regimes for the lifetime of any surface water drainage schemes*'.
- Several large pressurised water mains and sewers cut through the site. Also there are existing UU easements which will need to be considered.
- Consideration must be given to disposal of surface water in the most sustainable way.

City of Trees - Extensive and high quality green infrastructure needs to be developed across these housing areas as part of any development. In addition to this green infrastructure based SUDS should also be incorporated. Where possible existing trees and woodlands should be retained.

Bamford Green Belt Action Group:

- The proposed development performs poorly against the following GMSF policies: GM1, GM4, GM5, GM6, GM7, GM8, GM9, GM12, GM13, GM14, GM15, GM16, GM17, GM18, GM20, GM21, GM22, GM23 and GM24.
- The development is not in a sustainable location and has poor accessibility to public transport.
- The development is on Green Belt land and impairs environmental quality.
- The development is wholly at odds with NPPF and GM6.
- The development density does not reflect the accessibility of the site and is out of proportion with public transport stops and high frequency services. There is no rail or Metrolink to the area, limited bus services and the local highway network is already severely congested at peak times. The development is not located to reduce the need to travel by car due to the limited public transport services.
- The site is not “internationally” accessible and not considered nationally accessible.

- The location of the site does not encourage journeys by walking, cycling and public transport.
- There is a disconnect between the type of residential dwellings planned (i.e. executive homes) and the lack of high-paid employment opportunities in the locality. This will lead to a reliance on private car journeys to the development and result in increased carbon emissions.
- The increased car travel, congestion and air pollution would have a strong negative impact on the Air Quality Management Area (AQMA) at Norden Road, and Bury and Rochdale Old Road.
- The site delivers the majority of the ‘key priorities’ set out in GM7 and therefore its development would be counterproductive to the GMSF Green Infrastructure objectives and also the Rochdale Green Infrastructure Action Plan.
- The loss of fields, hedges and trees in close proximity to Ashworth Valley will have a negative impact on Green infrastructure.
- The proposed development of houses is on the only current green link between Bagslate Quarry and Ashworth Valley connecting the residents of Bamford and the wider community to Ashworth Valley. Development will adversely affect biodiversity and severely reduce the ability of wildlife to cope with climate change. It is likely that hedgerows and trees will be felled in order to develop the land effectively.
Destruction of part of the woodland habitat will be negative for animal, bird and plant species.
- Development of non-essential executive housing on Green Belt fundamentally contradicts National and local Green Belt policy, there is no evidence of exceptional circumstances test being met and there is a lack of evidence that brownfield sites have been objectively assessed in priority to this Green Belt site.
- The development would materially reduce the recreational opportunities (running, walking, cycling, horse riding etc.) and be terminal for long established sports clubs (football, cricket and tennis). This would not only impact Bamford and Norden residents but those from further afield that currently use the site. The loss of recreation facilities can only have a negative impact on future health. This is the only undeveloped space in Bamford, its loss would result in no accessible green space in Bamford Road
- This area is extensively used open land with public rights of ways, football pitches, tennis club/ courts and a cricket club (including pitch and clubhouse). The removal of these long established uses would have a negative impact on leisure of the local community. The loss of the football pitches alone would impact over 700 children who currently use them.
- The loss of these sports pitches is contrary to Sport England’s policy on protecting playing pitches.
- Taking away a significant area of natural open land would reduce the ability of the area to withstand the challenges of climate change, natural hazards and ill health
- The heating systems from 750 houses will significantly increase CO2 emissions.
- The area is well known for flooding and contains a natural spring, the development will increase flooding risk and further overstretch drainage systems already operating at maximum capacity.

- The development on the green fields and their current setting would not demonstrate respect for the local character of Bamford Road There would also be a negative impact on the Grade II listed Bamford Chapel.
- There are very few local amenities in walking distance to the site. The nearest local centre provides limited services and does not include a doctor's surgery, pharmacy or post office.
- The location's primary and secondary schools are already at full capacity and unable to take on additional places.
- The development is not increasing "affordable" housing and is diverting resource away from developing deprived areas in Rochdale.
- A development of this scale and size should, as a priority, be located in an area that has existing infrastructure to cope with the additional burdens which will inevitably arise.
- The large number of pylons and high voltage power lines on the site which require buffer zones from development significantly reduces the amount of land available for actual development and the deliverability of the site.
- The site has significant mineral deposits of brick clay, coal and sandstone. The GMSF takes no account of the GM Joint Minerals DPD and appears to side step the question of whether the minerals should be protected and assumes development would occur.
- There is a concern that large developers (such as Peel Holdings) may be placing undue influence on the GMSF to release Green Belt and fulfil their own profit objectives.
- The site is in multiple ownership which raises concerns as to whether the site is actually deliverable.

[OA14 Land in Roch Valley, Smallbridge/Littleborough](#)

Who Responded

There were 20 submissions to this section. These were from 15 individuals, no couples or other family groups, no unknown people (name not supplied/illegible), Cllr Ann Stott, Cllr Janet Emsley, one developer/landowner (Taylor Wimpey Ltd), and two other organisations (the Environment Agency, Historic England).

Summary of Issue(s) Raised

Release of Green Belt

- Developers want to develop Green Belt sites before brownfield sites as they are cheaper, in more scenic locations and make more profit. Rochdale has many brownfield sites which should be considered and developed first, before any Greenfield and Green Belt sites. The Green Belt provides a natural break from other nearby communities and its loss would create urban sprawl.

Transport/Highways

- The existing roads will not be able to cope with the additional traffic created by the additional housing. Parking is already an issue in this area with many cars blocking

roads. Accidents on the M62 near J21 cause the roads to become gridlocked with traffic diverting through this area. The additional traffic will increase the carbon footprint in the area, creating higher pollution levels resulting in poorer air quality.

- Train services from Littleborough are already overcrowded and would not be able to cope with an increase of rail commuters.
- The proposed site is dependent on access from Holland Street and Brooklyn Avenue.

Social Infrastructure

- The local social infrastructure cannot cope with the increased population resulting from this development. The local schools, dentists and doctors are already oversubscribed and unable to cope with the current demand. Whilst the proposed allocation does include a new school, this is located in Rochdale, not in Littleborough. This will result in children from Rochdale being given priority for places. The proposed allocation does not fully consider the impact on these services. Improvements need to be made to social infrastructure before any new housing is built.

Health, wellbeing, community and heritage

- Littleborough has a shortage of leisure facilities, especially for children. An increase in children living in the area with no leisure facilities will result in an increase in antisocial behaviour.
- Land within the allocation is currently used by the local football team, Bridge JFC, to train and play matches. Development would result in the loss of this facility which is currently well used by the community.

Green Infrastructure/Biodiversity

- Part of the site falls within a designated Green Space Corridor, this should be protected from development which will have a negative impact on the sightline from Smithy Bridge Road to Rochdale. The site currently provides environmental enhancement for the health and wellbeing of local residents. This development would have an adverse effect on the countryside, wildlife, biodiversity and mature trees which need to be preserved. It would also result in disruption to local footpaths and bridleways which are well used.
- The site is within a flood plain, which has flooded several times. Further work needs to be carried out to assess the flood risk of development on this site.
- The proposed site includes part of the protected allotments area. These allotments have already been relocated from their historic site on Scott Street in 1998/2000, to allow for a housing development.

Economy and Tourism

- The development will have an adverse effect on tourism. Tourists visit the area to see the lake and the surrounding areas, for example though bike riding and horse riding. The loss of another greenspace will be detrimental to the area surrounding Hollinworth Lake and therefore tourism. This will also have a detrimental effect on the local economy of which tourists play a big part.
- The geography of the area is not suitable for heavy industrial uses.

General

- It is unlikely that Rochdale Council will be able to afford the level of physical and social infrastructure required to accommodate this development, e.g. new roads and school. This cost will not likely be covered by the developer as they will claim it makes the development unviable. Therefore who the required infrastructure will not be provided, or will result in unaffordable executive homes being built to cover the costs.
- Residents have a lack of confidence in Rochdale Council and feel the site has already been surveyed and agreed for development prior to the consultation.
- The site has been proposed for allocation without any regard for the policies within the Rochdale Core Strategy.
- There is no reference to affordable housing and if/how this will be provided.

Comments from organisations

- **Taylor Wimpey** – Supports the proposed allocation on the following bases: Strategic and sustainable location; lack of environmental or technical constraints; deliverability & contribution to housing supply; will provide socio-economic benefits. The site provides a logical extension to the urban area. Taylor Wimpey supports the housing capacity for OA14 at 300, but suggests it should be amended to 320 and in approximate terms.
- **Environment Agency** –
 - Whilst we support bullet point 2 where development has to have regard to the river valley setting through design and layout, we consider this should be strengthened to explicitly reference SUDS and enhancement of River Roch (suggested wording provided).
 - The River Roch is currently classified as ‘moderate’ under the Water Framework Directive (thereby failing its current objective of Good Ecological Potential). Any development will need to ensure there is no deterioration in this status and seek opportunities to enhance this waterbody where possible.
 - The Environment Agency has a programme of flood risk capital work (known as the Investment Programme) and we have identified that a scheme for the Roch Catchment is planned within the next 6 years. This scheme is upstream of this allocation and will seek to reduce the impacts of flood risk. Whilst Government funding is not guaranteed for this scheme we would welcome further discussion on how the GMSF and/or any detailed master planning can support this programme of work.
- **United Utilities** – Several sewers fall within the site. Consideration must be given to disposal of surface water in the most sustainable way.

- **Historic England** - The site is adjacent to a Grade II* listed heritage asset and a Grade II listed heritage asset. The allocation does not appear to have been informed by any assessment of effects upon the historic environment which accords with the requirements of NPPF or the methodology set out in Historic England's Advice Note 3. Without this assessment, the GMSF cannot demonstrate that the principle of development and the quantum (numbers) can be achieved on the site without harm to the historic environment. As a consequence the allocation is potentially unsustainable and therefore unsound. Any such assessment should be undertaken by an appropriately qualified conservation specialist familiar with the site.
- **Lancashire Wildlife Trust** - We propose an additional policy requirement to establish new green infrastructure linkage.
- **City of Trees** - Any new development should incorporate extensive and high quality green infrastructure. This should contribute to the proposed SUDS in the development.
- **North and North Wales Canal and River Trust** - Consideration could be given to opportunities for access to the Rochdale canal as part of proposals to enhance walking and cycling infrastructure connecting into existing public rights of way.

Comments from Councillors

- **Cllr Janet Emsley** - The allocation adjacent to Smithy Bridge Road needs further assessment carried out for flood risk. The site has a history of flooding (refers to 2015 Boxing Day flood). The site is also designated as a green corridor; building here will impact negatively on the sightline from Smithy Bridge Road to Rochdale Town Centre.
- **Cllr Ann Scott** – Objects to the proposed allocation on the following grounds: Green Belt land is protected from development and site is currently active farm land; the social infrastructure (schools, doctors and nearest hospital) are already oversubscribed and cannot cope with the demand created from additional housing; the local roads are already at capacity, made worse if an accident happens on the M62 and traffic is diverted through Littleborough, the roads cannot cope with the demand created from additional housing; there are brownfield sites available which should be developed instead of Green Belt.

OA15 Trows Farm, Castleton

Who Responded

There were seven submissions to this section. These were from six individuals, no couples or other family groups, no unknown people (name not supplied/illegible), no politicians, no developers/landowners, and one other organisation; the Environment Agency.

Summary of Issue(s) Raised

Release of Green Belt

- The loss of Green Belt would have a lasting effect on our future generations, depriving them of this green area and its environmental benefits.

- Green Belt was designated and protected for a good reason; once it's developed it's gone forever. There is no reason to change the status of this land and develop it.
- There are plenty of brownfield sites which should be developed instead of Green Belt.
- The release of Green Belt for development will result in urban sprawl and the merging of built up areas.

Transport/Highways

- Existing highway infrastructure is unable to cope with existing traffic levels, with queues from Rochdale to Middleton every night.
- Who is going to maintain the roads and top water grids.
- Heywood has no rail station or Metrolink stop.

Social Infrastructure

- There are not enough school places for the existing number of houses in the area and they will not be able to cope with additional pressures caused by additional housing.
- The GP surgeries are already oversubscribed and will not be able to cope with additional pressures caused by additional housing.
- The hospital facilities are already overburdened, especially the A7E since most treatments have transferred to Oldham and Bury.

Health, wellbeing, community and heritage

- Lots of people walk and exercise in this area. This reduces stress and keeps people fit.

Green Infrastructure/Biodiversity

- There is a lot of wildlife in the area, some of which are protected species. Particularly on the Western section adjacent to Leander Drive.
- There are underground storage reservoirs in the proposed site area.
- Danger of sand belt running through the area which does not make building on this site suitable.
- Poor air quality in area with existing M62 links, further traffic caused by additional houses will add to this.
- The water run-off from the hills could make flooding more susceptible to Castleton village and Middleton. Extra concrete does not allow water to be absorbed into ground.
- The area already suffers from flooding in heavy rain.
- Loss of valuable green surroundings such as trees and hedges and access to open land for residents.

General

- Site located next to a motorway so cannot be high quality housing as stated.
- Buildings in this area are already subject to subsidence.

- The loss of farms will result in the loss of valuable food production.
- The GMSF plan is based on the assumption that the population of this country will keep on increasing. The Brexit Leave vote must surely reduce this expectation considerably. The plan should be scaled back accordingly.
- The proposals will create lots of building jobs, a good proportion of which will be sourced by imported workers, who need to be housed, bring their families and generate the next phase of building demand.
- We would use housing stock better if Stamp Duty was reformed so it doesn't penalise older home owners who want to downsize.

Comments from organisations

- **Environment Agency** – We consider that bullet point 3 should be expanded, strengthened to clarify what is meant by '*good quality green infrastructure*'. As part of this we would welcome reference to the use of green or soft sustainable urban drainage systems and ecologically designed greenspace buffers which positively integrate with the reservoir network to south of site. This supports GMSF policies GM18 (Flood Risk) and GM25 (Allocations). Green SUDS have greater environmental benefits over hard engineered options (e.g. underground tanks/pipes). Suggested wording could be: '*Use the topography and contours within the site to deliver a well-designed scheme which provides an integrated network of green infrastructure which links with the reservoir network to the South. Incorporate measures to mimic natural drainage through the use of green sustainable urban drainage to control the rate of surface water run-off*'.
- **Indigo Planning on behalf of GLP Ltd** - GLP Limited is promoting land at Trows Lane, Rochdale; and has aspirations to deliver a residential led scheme in the order of around 600 – 650 dwellings across the site. The site is supported with the following comments made:
 - This is a deliverable site with no constraints that will prevent development being delivered.
 - The site is achievable with a major house builder already on board to bring the site forward.
 - The site provides an excellent opportunity to widen housing choice in a sustainable location, as stated in the Allocation policy.
 - Residential development would result in significant economic, social and environmental benefits to the local area and community.
 - The site complies with the policies set out in Rochdale's Core Strategy.
 - The site lies outside the Green Belt, representing an opportunity to meet some of the development needs of the Borough without having to release Green Belt sites.
 - The site is strategically well placed in terms of highways and local services.
 - Development would bring investment into public benefits.
 - Some changes to the allocation policy are sought.
- **United Utilities** –
 - Suggested text to be added to allocation: '*the development of the site will be expected to incorporate Sustainable Drainage methods in accordance with national and local standards. Any drainage proposal will be expected to be*

part of a site wider strategy to avoid piecemeal development and demonstrate how the site delivers sustainable drainage as part of interconnecting phases. Applicants wishing to discharge to public sewer will need to submit clear evidence demonstrating why alternative options are not available. Approved schemes will be expected to be supplemented by appropriate maintenance and management regimes for the lifetime of any surface water drainage schemes’.

- Consideration must be given to disposal of surface water in the most sustainable way.
- **Lancaster Wildlife Trust** – We propose an additional requirement to safeguard the adjacent grassland SBI and water bodies, and secure their management, as the SBI is ipso facto and the water bodies potentially part of Greater Manchester’s ecological networks.
- **City of Trees** – Point 3 should be requiring extensive and high quality green infrastructure rather than just “good quality” green infrastructure. Green infrastructure based SUDS should also be required. Extensive tree planting should be carried out adjacent to the M62 and A627 (M) motorway corridors to help reduce noise and air pollution.
- **Rochdale Field Naturalists Society** – Objects to allocation for following reasons:
 - Development resulting in an urban sprawl with little or no green relief.
 - No reasonable access to open space and surrounding countryside.
 - Open land and Green Belt can be of great value to wildlife, containing as it does a mosaic of habitats and numerous Sites of Biological Importance, SSSIs and Local Nature Reserves. It can also provide important wildlife corridors along which species can move and prosper, which could all be threatened if the development allocations are implemented.
 - The Green Belt is also of great physical and emotional value to local people, who can walk on footpaths enjoying fresh air and the natural environment around them, an important element of personal health and wellbeing.
 - We are concerned that the proposed development allocations in the GMSF may not comply with the statutory duty under Section 40 of the Natural Environment and Rural Communities Act 2006 to protect, conserve and restore biodiversity. A key purpose of this duty is to embed consideration of biodiversity within public bodies as an integral contribution to the achievement of the commitments made by the Government in its Biodiversity 2020 Strategy.
 - Allocation contradictory to polices G4, G5 and G7 in Rochdale’s Core Strategy.
 - Question what ecological surveys have been undertaken for the GMSFs proposed development sites in the Borough to assess their biodiversity importance, in order to inform decisions on the implications on the Section 40 duty.
 - Concerned that releasing this amount of Green Belt land in Rochdale Borough and surrounding areas could critically undermine another vital purpose of the Greater Manchester Green Belt policy. We recognise that some brownfield sites can have biodiversity interest and can contribute to wider ecological networks, which need to be taken into account in urban regeneration policies. We feel, however, that allowing any development in the Green Belt to meet

long term strategic requirements needs to be very carefully and critically considered to ensure it does not reduce incentives and policy pressure to make the best use of brownfield and other sites within the current urban area.

OA16 Land to the North East of Smithy Bridge

Who Responded

There were 17 submissions to this section. These were from 12 individuals, one couple, no unknown people (name not supplied/illegible), Cllr Ann Stott, Cllr Janet Emsley, and the Environment Agency.

Summary of Issue(s) Raised

Release of Green Belt

- The proposed area is currently green belt land and encapsulates the semi-rural location of Littleborough.
- There are other brownfield sites within Rochdale that should be built on instead of the countryside.
- A main function of green belt is to prevent villages joining. This loss of green belt will join Smithybridge to Littleborough, losing the identity of Smithybridge.
- An adjacent brownfield site (the previous Akzo works) has remained undeveloped for 10 years after planning permission was granted. This site should be brought forward before Green Belt is released.

Transport/Highways

- The local road network is already struggling and during peak times Hollingworth Road grinds to a standstill as one of only two roads into Littleborough from the motorway. Constraints mean that there is limited opportunity to improve this road
- The roads cannot cope with the existing traffic and so will not be able to cope with increased traffic from this development.
- This would be exacerbated by an additional access onto Hollingworth Road and the erection of a new school.
- The site also covers one of the car parks that is used by visitors to the lake and all of the car parks are at capacity most weekends as it is as well as parking along Hollingworth Road, making it quite dangerous to drive down this stretch of highway.
- Concerns over the potential impact on the already overcrowded rail services. They cannot cope with the existing demand and carriages are dangerously overcrowded. Major investment would be needed to bring the rail service up to a decent standard
- Close inspection of the existing infrastructure is necessary before any decision is made, along with at least an outline plan on how to avoid a complete gridlock of the area.

Housing

- New build bungalows would be more appropriate in this area to support the aging population.

Social Infrastructure

- Local schools and services are already oversubscribed. As well as a new Primary School, other services and facilities would be required to meet the demand from new residents.
- There is a major lack of good secondary schools in the area.
- A new primary school would be better placed further along the A58 towards Rochdale, reasons would be to prevent further traffic congestion in the village, have better access to public transport, and more localised to Wardle, Smallbridge and Hurstead which would encourage children to walk to their school. This will go some way towards tackling the climate change and air pollution commitments.

Health, wellbeing, community and heritage

- Development will create additional air and noise pollution caused by additional traffic.
- Many people use the areas for dog walking, cycling, horse riding etc. providing benefits to people's health.

Green Infrastructure/Biodiversity

- Building on the land would have a detrimental impact on wildlife.
- The area is an important site for wildlife with many species of birds, deer, badgers, wildfowl and bats, some of which are protected.
- Residents bought property in this area because of access to local countryside and views.
- This development will create a concrete mass in the heart of Smithybridge with no green space.
- This area already has significantly poor drainage and further development impacts on the risk of flooding for houses at the bottom of the hill. This area is already waterlogged and currently floods. Work has already started to reclaim a brownfield site that abuts this proposal, which has already made the area more waterlogged.
- Development of this site will result in increased flooding as runoff in heavy rainfall will have nowhere to drain.
- United Utilities recently installed storm water attenuation tanks in this site which is important environmental infrastructure. This should be safeguarded against future development, how would these be developed on whilst being operated and maintained adequately.
- Developing this site would inevitably result in a loss of biodiversity and I question whether the proposals comply with the statutory duty under Section 40 of the Natural Environment and Rural Communities Act 2006 to protect, conserve and restore biodiversity.

- Question as to whether any ecological surveys have been undertaken for the proposed development at this site to assess its biodiversity importance.
- The proposed development does not comply with GMSF Policy GM7 on Green Infrastructure or meet the requirements of GMSF Policy GM8 on Nature Conservation.

Economy and Tourism

- Hollingworth Lake does not just have recreational value but is also an important resource as a nature reserve and tourist attraction. Development of this site would detract from the attractiveness of Hollingworth Lake and its wild countryside for local residents and visitors.
- The proposal will have a negative effect on visitor numbers and income received from tourism in the area.
- The loss of the car park would have a very negative effect, as income from parking charges would be lost to the council which could be utilised to reinvest in the area.

General

- Policy states that design and layout should complement the proposed development on the adjacent Akzo Nobel site. However, since that proposal does not comply with the Littleborough town design statement this should not be encouraged.
- Some duplication between the allocation site and that which was included in the application for the Akzo Nobel development
- There are disused coal mines throughout the site which are flooded with water.
- There is a conduit running underground from the Lake to the Canal running the whole length of the site which is evidenced on the Akzo application 11/D55085. No housing or other buildings can be built within a 5m easement of this structure.
- There is a working farm on the site and the farmer stated that he knew nothing about his land being put forward. Even if this is not illegal it would seem morally wrong
- There was a complete lack of notification and many residents did not know about these plans.
- The proposed massive increase in number of potential new housing (300) would affect the community, as the development has the potential to over populate the current area.
- This development would have a negative impact on the value of surrounding properties.
- This development would have a negative impact on existing residents.
- The allocation is adjacent to the site on which Akzo chemical works stood which already has planning permission for residential housing although various concerns of local residents have not been adequately addressed, such as traffic congestion, school provision, medical provision, nor have the residents been reassured regarding the treatment of contaminated land.
- We find your mapping portal difficult to use and do note at least one other plan did show the same site with some form of standoff from the river, this is confusing and unclear as to what site is actually being consulted on.

Comments from organisations

Environment Agency:

- Environment Agency are working with AGMA to refine flood risk evidence base, aim to produce an updated SFRA at a GM scale and this will review all site Allocations
- In line with NPPF, outputs from this study will feed into an updated policy for this site
- There is no reference to the use of sustainable urban drainage systems within this strategic allocation. To comply with GMSF policies GM18 (Flood Risk) GM25 (Allocations)
- Recommend that reference is made to soft or green SUDS which have environmental benefits over more engineered options
- Suggested wording (taken from other Allocation policies) could be: incorporate measures to mimic natural drainage through the use of green sustainable urban drainage to control the rate of surface water run-off.

United Utilities:

- Several large pressurised water mains and sewers cut through the site
- Also there are existing UU easements which will need to be considered
- Consideration must be given to disposal of surface water in the most sustainable way

Rochdale Field Naturalists:

- Welcome the GMSF's attempt to take a long term, strategic and comprehensive view of the future of the Greater Manchester city region and the need to balance development with the preservation of natural habitat, wildlife and open spaces
- Support addition of land to the Green Belt
- Have major concerns regarding allocations within the Green belt, including OA17
- Have major concerns that the Framework does not give adequate attention to the value of open land and the Green Belt, particularly in the southern and south-western margins of the Rochdale Borough where relatively large stretches of Green Belt are allocated for development
- Large reduction in the open land between settlements
- Would create urban sprawl with no green relief
- Open land and Green Belt can be of great value to wildlife, containing as it does a mosaic of habitats and numerous Sites of Biological Importance, SSSIs and Local Nature Reserves. It can also provide important wildlife corridors along which species can move and prosper, which could all be threatened if the development allocations are implemented.
- Such open space has significant value for the health and well-being of local people
- Concerned that the proposed development allocations in the GMSF may not comply with the statutory duty under Section 40 of the Natural Environment and Rural Communities Act 2006 to protect, conserve and restore biodiversity.

- Rochdale Council's Core Strategy of 2013 refers to the continued protection of the current Green Belt throughout the plan period
- Concerned that releasing this amount of Green Belt land in Rochdale Borough and surrounding areas could critically undermine policies within the Rochdale Core Strategy and the purposes of the Greater Manchester Green Belt policy. This includes the purpose to redirect development pressure and needs to existing urban areas, particularly brownfield sites, as part of an overall policy emphasis on urban regeneration and concentration
- Developers generally much prefer developing cheaper Greenfield land than potentially more difficult urban brownfield sites, yet experience since the GM Green Belt was established demonstrates that steering development pressure to existing urban areas is perfectly feasible
- Allowing any development in the Green Belt to meet long term strategic requirements needs to be very carefully and critically considered to ensure it does not reduce incentives and policy pressure to make the best use of brownfield and other sites within the current urban area.
- These concerns can all be regarded as **OBJECTIONS** to the following development allocations in and around Rochdale Borough: - NG1a (north of M62); - NG1b (south of M62); - NG2 (east and west of A627M); - NG3 (M62 Junction 21); - OA13 (Bamford/Norden); - OA14 (Smallbridge/Littleborough); - OA15 (Castleton); - OA16 (northeast of Smithy Bridge); - OA17 (east of Heywood).

Lancashire Wildlife Trust:

- Loss of strategic green infrastructure should be avoided or mitigated.
- Any development must protect and enhance the Hollingworth Lake SBI and other water bodies and maintain, sustain and, where appropriate, restore their ecological network linkages.
- Where practicable, the development should contribute to works that would contribute to the aims of the South Pennines Grasslands Project within the allocation and/or on adjacent land.

City of Trees:

- Extensive and high quality green infrastructure should be required across the site. Green infrastructure based SUDS should also be required to manage the surface water.

North & North West Canal & River Trust:

- The proposed allocation borders the Rochdale Canal to the north which is owned and maintained by the Canal & River Trust.
- The Trust notes reference to the need for development to take advantage of its setting. Any masterplan or development should have full regard to the general principles outlined previously and in particular to the structural integrity of the canal cutting within the site.

- The Trust would also bring to your attention the feeder channel linking Hollingworth Lake and the Rochdale Canal which runs roughly parallel to Hollingworth Road, approximately 140m into the site. Developer contributions may be required towards any improvements necessary to mitigate the impact of the proposed development on the canal, such as increased use of the towpath and this should be reflected within the policy.
- The Trust would welcome the opportunity to be actively involved in any future master planning of this site.

Comments from owners of land within allocation

- Land owners support the allocation and consider the site to be particularly suitable for residential development, taking into account proximity to existing housing, local facilities and employment areas.
- Land owners approached by house builders and promotion companies interested in bringing development forward indicating the site is deliverable.
- All land owners in agreement to pursue development indicating the site is deliverable.
- It is considered development of the land can come forwarded in advance of the formal adoption of a masterplan. Therefore suggestion to amend wording in policy GM25 to reflect this.

Comments from Councillors

Councillor Emsley:

- Proposed development covers the existing car park and losing this would be detrimental to the parking facilities at Hollingworth Lake
- Parking and transport to and from the Lake must be given due consideration in any plans
- Drainage issues on the site
- Proposed development at Akzo Nobel referred to creation of a corridor to the lake and this needs considering in the plans
- Councillor would welcome any further discussions with officers on any other plans that may be affected or which would affect strategic plans for RBC
- Need to consider Rakewood Road and the safety of pedestrians. Plans are already drawn up to address this problem but await funding opportunities to move it forward

Councillor Stott:

- Houses proposed without any thought to supporting infrastructure. Local primary schools are already full.
- There are no plans for additional doctor's surgeries or health care facilities. The nearest A&E department is at Oldham Hospital.
- Road infrastructure is already very constricted and packed to capacity. Existing roads are very narrow and not suitable for increased traffic.

- There are brownfield sites which can and should be utilised before using Green Belt. Once farming land is developed it can never be reclaimed.

[OA17 Land at Lane End, East of Heywood](#)

Who Responded

There were nine submissions to this section. These were from three individuals, one couple, no unknown people (name not supplied/illegible), no politicians, and the Environment Agency.

There were three submissions from developers/landowners:

- M&J Southwell, Sandpits Farm
- Mr & Mrs M Yates
- B Stansfield & family, Heap Brow Farm (re Top o' th' Moor Farm).

Summary of Issue(s) Raised

Release of Green Belt

- The development of Green Belt is not the answer and is against the wishes of residents. Once it is gone it cannot be replaced
- Unnecessary destruction of Green belt and habitat – should be building on brownfield sites first. Already many unused brownfield sites and it has been acknowledged that these should be developed first. If plans go ahead developers will just build on the Green Belt sites and ignore existing brownfield sites
- Developing the Green belt between Heywood and Middleton will lead to the distinct borders between the towns being lost
- Opposed to the loss of them on the basis that there were considered appropriate as Green Belt in the first place

Transport/Highways

- Middleton Road in Heywood is a main artery for emergency vehicles and is used as a bypass when the M62 is closed.
- Traffic in the area is already at unacceptable levels. This road is not up to traffic generated from new development and proposed new access from junction 19. Access is a problem for HGV's from Pilsworth and whilst J19 link will help with this there needs to be improvements at the junction with Moss Hall Road
- Quality of the road itself is poor and this has never been addressed
- Only access point is onto Green Lane which is already congested

Housing

- Heywood needs more low cost starter housing

- House builders need to build on these brownfield sites and not sit on planning permissions
- Lack of evidence to support the need for executive homes, particularly in this area given proximity to M62. There is little demand for expensive homes and those that exist in the area take a long time to sell. There is already have the proposed new development at Hollin Lane / Langley Lane which will provide 3,4 and 5 bed homes

Social Infrastructure

- Infrastructure needs to be updated
- Local amenities and infrastructure could not cope with the additional extra homes e.g. schools, nursery, doctors, dentists, petrol stations sports centres A&E departments, maternity services, supermarkets
- Lack of infrastructure means that new development would have a negative impact on local towns and villages which already rank highly in terms of poverty

Health, wellbeing, community and heritage

- Air and noise pollution caused by additional traffic, particularly HGV's using the new link road and from the proposed new development. Also pollution from the building work. The impact of air pollution on health is becoming clearer

Green Infrastructure/Biodiversity

- Need to incorporate high quality and extensive green infrastructure including SUDS
- Tree planning should be used to help reduce noise and air pollution

Economy and Tourism

- In looking at planning application for commercial development off J19 have found that there are a number of existing empty warehouses in the Rochdale area. Consider that empty space should be utilised before building new premises. Better use should be made of these existing employment sites.
- New jobs are welcome but there is no evidence that new sites are needed given the spare capacity at Pilsworth, Stakehill and Kingsway.

General

- Development is only being supported by Councillors because of the extra rates
- Heywood and Middleton are already more densely populated than other parts of the borough and there has recently been approval for a large housing scheme in Middleton
- Need to take account of the views of local people, most of whom, including the local MP, seem to be against these proposals
- Do not believe that these areas have anything to offer people moving into the area

- The proposal at Lane End is not justified and requests that the plans to develop in this area be abandoned
- This will lead to more derelict sites, more congestion, more pollution and the loss of green space
- The proposal at South Heywood/Pilsworth (NG1a) has more merit as the land in question is low quality and underused and will attract jobs and housing and improve transport links. However it should include a large element of low cost housing

Comments from organisations

Environment Agency

- There is no reference to the use of sustainable urban drainage systems within this strategic allocation. To comply with GMSF policies GM18 (Flood Risk) GM25 (Allocations)
- Recommend that reference is made to soft or green SUDS which have environmental benefits over more engineered options
- Suggested wording (taken from other Allocation policies) could be: incorporate measures to mimic natural drainage through the use of green sustainable urban drainage to control the rate of surface water run-off.

United Utilities

- Several large pressurised water mains and sewers cut through the site
- Also there are existing UU easements which will need to be considered
- Consideration must be given to disposal of surface water in the most sustainable way

Rochdale Field Naturalists

- Welcome the GMSF's attempt to take a long term, strategic and comprehensive view of the future of the Greater Manchester city region and the need to balance development with the preservation of natural habitat, wildlife and open spaces
- Support addition of land to the Green Belt
- Have major concerns regarding allocations within the Green belt, including OA17
- Have major concerns that the Framework does not give adequate attention to the value of open land and the Green Belt, particularly in the southern and south-western margins of the Rochdale Borough where relatively large stretches of Green Belt are allocated for development
- Large reduction in the open land between settlements
- Would create urban sprawl with no green relief
- Open land and Green Belt can be of great value to wildlife, containing as it does a mosaic of habitats and numerous Sites of Biological Importance, SSSIs and Local Nature Reserves. It can also provide important wildlife corridors along which species can move and prosper, which could all be threatened if the development allocations are implemented.
- Such open space has significant value for the health and well-being of local people

- Concerned that the proposed development allocations in the GMSF may not comply with the statutory duty under Section 40 of the Natural Environment and Rural Communities Act 2006 to protect, conserve and restore biodiversity.
- Rochdale Council's Core Strategy of 2013 refers to the continued protection of the current Green Belt throughout the plan period
- Concerned that releasing this amount of Green Belt land in Rochdale Borough and surrounding areas could critically undermine policies within the Rochdale Core Strategy and the purposes of the Greater Manchester Green Belt policy. This includes the purpose to redirect development pressure and needs to existing urban areas, particularly brownfield sites, as part of an overall policy emphasis on urban regeneration and concentration
- Developers generally much prefer developing cheaper Greenfield land than potentially more difficult urban brownfield sites, yet experience since the GM Green Belt was established demonstrates that steering development pressure to existing urban areas is perfectly feasible
- Allowing any development in the Green Belt to meet long term strategic requirements needs to be very carefully and critically considered to ensure it does not reduce incentives and policy pressure to make the best use of brownfield and other sites within the current urban area.
- These concerns can all be regarded as **OBJECTIONS** to the following development allocations in and around Rochdale Borough: - NG1a (north of M62); - NG1b (south of M62); - NG2 (east and west of A627M); - NG3 (M62 Junction 21); - OA13 (Bamford/Norden); - OA14 (Smallbridge/Littleborough); - OA15 (Castleton); - OA16 (northeast of Smithy Bridge); - OA17 (east of Heywood).

Comments from owners of land within allocation

- Land owners support the allocation and consider the site to be particularly suitable for residential development, taking into account proximity to existing housing, local facilities and employment areas.
- Land owners approached by house builders and promotion companies interested in bringing development forward indicating the site is deliverable.
- All land owners in agreement to pursue development indicating the site is deliverable.
- It is considered development of the land can come forwarded in advance of the formal adoption of a masterplan. Therefore suggestion to amend wording in policy GM25 to reflect this.

OA18 East Boothstown

Who Responded

There were 99 submissions to this section. These were from 79 individuals, 13 couples or other family groups, no unknown people (name not supplied/illegible), Worsley ward councillors (Cllrs Garrido, Compton, and Clarkson), one developer/landowner (Peel Group), and two other organisations: the Environment Agency, and Residents Against Inappropriate Developments.

Summary of Issue(S) Raised

All but a few representations from the local community strongly objected to the proposed allocation. Barbara Keeley MP, local ward councillors and the group Residents Against Inappropriate Development (RAID) all objected to the allocation. By far the most frequently raised concern was the impact on traffic congestion. All but a few who objected raised this as an issue. A large number of representations also raised concerns regarding air quality, loss of Green Belt and the recreation value of the site, as well as pressures that development would place on community infrastructure.

Only a very small number of respondents (5) offered their support to development of the land. One resident fully supported the allocation, whilst four others were supportive subject to transport infrastructure improvements. Another resident offered their support but noted that the site should not be over developed. The Peel Group fully support the development of the site, commenting that the land represents a suitable, available and achievable development opportunity.

Suggested policy amendments were received from a number of organisations including Salford Clinical Commissioning Group, City of Trees, United Utilities and the Environment Agency. Lancashire Wildlife Trust objected to the allocation on the basis of the site's biodiversity value. South Lancashire Bat Group also objected on a number of grounds, these being impact on air quality, loss of biodiversity, traffic congestion and loss of Green Belt.

It was noted by residents that traffic congestion is already a major issue in the area and further development would exacerbate the problem. In particular the A572 Leigh Road, the A580 East Lancashire Road, Junction 13 of the M60 and Worsley Road were identified as being problematic at peak travel times. Other roads mentioned were Walkden Road, the junction of Hazelhurst Road / Moorside Road, Moorside Road, Barton Road, the Worsley Brown roundabout and Ellenbrook Road.

Concerns were expressed regarding the cumulative impact on traffic. Reference was made to the RHS Bridgewater site, also existing and proposed residential developments, including some of the other GMSF allocations in Salford and the adjoining authorities. The problem of heavy goods vehicles adding to traffic was also mentioned. Many considered that the local road network cannot accommodate further development without significant investment, and that this would be challenging due to the area being physically constrained by the infrastructure and geographical features which surround it. A number of respondents questioned how a new road would solve the traffic problems in the area.

It was commented by a large number of residents that the area is poorly served by public transport and has no tram/train station. Capacity of the Leigh-Salford-Manchester guided busway was highlighted as an issue. Others suggested even if public transport were to be improved, this may have limited impact on traffic due to

lifestyles and the ingrained reliance on the car. It was noted that although a new road is referenced in the plan, the location is not shown.

Many comments made reference to pollution implications of further vehicles that the development would generate. The potential health implications associated with air pollution were noted. The retention of the site as a ‘green lung’, contributing to the amelioration of air pollution was suggested by many. Resultant noise from an increase in the number of vehicles in the area was also expressed as a concern by some.

Concerns were expressed regarding the loss of land in the Green Belt, and many of the comments suggested that there were sufficient, suitable previously developed sites, empty properties and homes for sale/rent to meet needs, and that these options should be fully explored before sites in the Green Belt are considered, highlighting the associated regeneration benefits in taking this approach. The value of the area of Green Belt in preventing urban sprawl was also noted. The site’s value to the community as a green space and a recreation asset was identified in a large proportion of the comments received, and the development of this site was strongly objected to on this basis. It was commented in three representations that enhancements to Chat Moss would not be adequate compensation for the loss of this area of Green Belt as Chat Moss is too far away. One respondent however welcomed the proposed enhancements to Chat Moss. Two respondents expressed the view that the land would be much better put to use by developing it into a large park to complement the RHS Bridgewater development.

There were concerns raised with regards to the capacity of existing community infrastructure and the potential for the development of this site to worsen the situation. Primary and secondary schools together with doctors’ surgeries were referred to most frequently, with concern also raised regarding the capacity of dentists, local hospitals, shops, leisure facilities and pressures this would place on emergency services in the area. The provision of new schools should be made a requirement. It was suggested that one new school would not be sufficient to meet this additional demand given that existing schools are already at capacity. It was noted that new community infrastructure should be in place prior to occupation of any new dwellings.

A number of general comments were made raising concern over the loss of wildlife. The Lancashire Wildlife Trust submitted detailed comments identifying the presence of particular species on the site. The Trust also expressed the view that there should be an analysis of the biodiversity value of the allocation. They suggested that it be acknowledged that the site lies adjacent to the Middle Wood SBI and reference should be made to the Greater Manchester Wetland Nature Improvement Area within which the proposed allocation lies.

Some respondents questioned whether there is a demand for extra housing in the local area and exiting the European Union will further reduce the need for new dwellings. Others questioned the need for higher value housing in the local area, and instead suggested there was a need for lower value / affordable dwellings in Salford. One respondent commented that 50% of houses built should be affordable to first time buyers. Areas including Broughton, Langworthy and Wigan were identified as suitable

locations to deliver this type of housing given the regenerative benefits this would have. One respondent commented that other local authorities should take on more of the burden of increasing housing numbers. Other comments related to the loss of amenity to existing residents in terms of privacy, loss of openness and views. There was concern that the development of this site would impact on the value of properties in the local area and would result in social problems. There is worry that the development would be of poor quality, both in terms of construction and design. The development of the site could also result in some existing residents choosing to move out of the area. There were concerns that the allocation would devalue the character of the RHS Bridgewater development and erode Salford's history.

Other concerns of residents included drainage problems on the site. United Utilities responded to the consultation noting that there are several pressurised water mains and sewers cutting through the site. Also there are existing easements which will need to be considered. Consideration must also be given to disposal of surface water in the most sustainable way.

OA19 Hazelhurst Farm

Who Responded

There were 95 submissions to this section. These were from 76 individuals, 14 couples or other family groups, no unknown people (name not supplied/illegible), councillors for Worsley ward (Garrido, Compton, and Clarkson), no developers/landowners, and two other organisations: the Environment Agency, and Residents against Inappropriate Development.

Summary of Issue(s) Raised

Strong objections were received from the local community and politicians in relation to the proposed allocation. The most frequently raised concerns were regarding congestion and air pollution, however a number of concerns were also expressed regarding the capacity of community infrastructure, site access, the impact on wildlife and the loss of land in the Green Belt which is valued by the local community. Strong support for the allocation was expressed by The Peel Group, which considers it to be a sustainable, accessible site that is well related to the existing urban area and not subject to any constraints preventing its development.

A large number of local residents expressed significant concerns with regards to existing traffic congestion issues in the area and considered that further development would exacerbate these problems. The roads that provide the main access routes to the M60 Junction 13 and the A580 were identified as being very congested at present, as were the feeder roads to these routes. Many of the comments indicated that congestion issues on the local road network were worsened due to people cutting through the area to access the motorway. The M60 (in particular junction 13) and the A580 were identified as being very congested, which has a significant impact on the operation of the local road network that surrounds the site allocation. Concerns were expressed regarding the cumulative impact of existing and proposed developments, including some of the other GMSF allocations in Salford and the adjoining authorities. Many considered that the local road network cannot accommodate further development without significant investment, and that this would be challenging due to

the area being physically constrained by the infrastructure and geographical features which surround it. A number of the comments suggested that the plan should identify the new infrastructure required and questioned the location of the proposed road referred to in the Salford City Mayor's letter to local residents. Calls were also made for a comprehensive traffic assessment to better understand the problems.

Some challenges were made to the site's public transport accessibility. Whilst it was recognised that the site is close to the Leigh-Salford-Manchester guided busway, it was considered inappropriate to rely on this to achieve a significant modal shift due to the limited destinations it serves. Capacity issues on the busway were also highlighted in some of the comments. Many of the comments considered that the area is poorly served by public transport and has no tram/train access, others suggested that a modal shift will be difficult to achieve due to people's lifestyles. The need for better connections to the main employment areas such as Salford Quays and Trafford Park was identified.

Concerns were expressed with regards to achieving appropriate site access, and access options for the site were identified as being limited. Taking access via Hazelhurst Road was identified as being challenging due to existing congestion issues on the road and the capacity of its junction with Moorside Road and the A580, its narrow width, on street parking and traffic calming measures.

In respect of pollution, concerns were raised regarding the site's proximity to the M60 and A580 and the potential for increased air pollution resulting from the additional vehicle movements. Many of the comments highlighted the potential health implications associated with increased air pollution and expressed concerns with regards to poor air quality in Salford compared to other areas, suggesting that 'green lungs' such as this site should be protected. It was also questioned whether acceptable noise levels could be achieved on the site due to the significant contributors to noise (i.e. adjacent roads, park and ride facility, high voltage cables and pylons on site). Concerns were expressed that further noise would be created as a result of the development both during and after construction, impacting on the quality of life of local residents.

The comments raised concerns with regards to the insufficient capacity of community infrastructure and the potential for further development to worsen the issue. Schools (both primary and secondary) and doctors were referred to most frequently, however, concerns were also raised with regards to the capacity of dentists, hospitals, shops, leisure facilities, nurseries, emergency services and public utilities. It was considered that the provision of a new primary school on the site should be made a requirement.

Concerns were expressed regarding the loss of land in the Green Belt, and many of the comments suggested that there were sufficient, suitable previously developed sites, empty properties and homes for sale/rent to meet needs, and that these options should be fully explored before sites in the Green Belt are considered, highlighting the associated regeneration benefits in taking this approach. This site was cited as being important due to it being one of the last remaining areas of Green Belt in the local area and land which prevents urban sprawl. The site's value to the community as a green space and recreation asset was

identified in many of the comments received, and the development of this site was strongly objected to on this basis.

General concerns were expressed regarding the loss of wildlife, and some of the comments cited the presence of particular species (most frequently birds) and important features on the site. Some of the comments raised concerns with regards to the impact on the SBI, and some thought that this would be lost due to it being included within the allocation. The Lancashire Wildlife Trust requested that the policy is strengthened to retain and restore ecological network links between the SBI, identified strategic green infrastructure and ponds.

Some of the comments questioned the need for the type of housing that would be delivered on this site due to its location (i.e. higher value), and suggested that the demand is for affordable housing. Areas such as Broughton, Langworthy, Ordsall and Wigan were identified as suitable locations to deliver this type of housing and areas in need of regeneration. Some expressed concern that there was limited detail on the type of housing to be provided on site, and questioned whether this would be apartments. Others suggested that the proposal represents overdevelopment and that the overall scale of housing proposed to be accommodated on the site should be reduced.

A more limited number of the comments received raised concerns regarding increased surface water runoff and flood risk as a result of the development, and the requirement for sufficient drainage on the site to avoid this. The Environment Agency did not raise any specific concerns in this regard, but requested that the policy makes reference to green/soft SUDS, and United Utilities explained that consideration must be given to the disposal of surface water in the most sustainable way.

Other concerns raised included the loss of land used for crop production, health and safety risks associated with the proximity of high voltage cables and pylons and the negative impact the development would have on the area's character, identity and economic potential. An alternative suggestion was made that the site should be developed into a community park.

[OA20 Woodford](#)

Who Responded

There were 654 submissions to this section. These were from 577 individuals, 33 couples or other family groups, 1 unknown person/people (name not supplied/illegible).

Six submissions were received from politicians/political organisations:

- Cheshire East Council
- Councillor Yvonne Guariento
- Helen Foster-Grime
- MP Mary Robinson
- Prestbury Parish Council
- Wilmslow Town Council

Nine submissions were received from developers/landowners:

- Frederic Robinson Limited

- Garner Family, et al
- Harrow Estates
- Jones Homes (NW) Ltd
- Michael Kingsley (The Estate of Marques Kingsley Deceased)
- Mr and Mrs G Petch
- Mr P Galligan (land off Woodford Rd, west of Poynton, south of Bramhall).
- Renew Land Developments Limited
- Vincent Clayton (land adjacent to Hall Moss Farm, Woodford)

Six submissions were received from other organisations:

- Friends of the Earth
- Highways England
- Historic England
- The Campaign to Protect Rural England, Friends of the Peak District & The NW Transport Roundtable (single submission)
- Woodford Neighbourhood Forum
- Woodford Women's Institute.

Summary of Issue(s) Raised

A wide range of issues were raised by consultees, the significant majority of which were in opposition to the proposed allocation. A large number of consultees raised the same issues within a standard form of wording.

Many consultees were concerned at the loss of agricultural land and the impact on jobs within the agriculture and equestrian sectors. The issue of a lack of employment opportunities in the locality was also raised, and the knock on impacts of this on transport and the affordability of housing, leading to the suggestion that new employment opportunities should be created in proximity to new housing or, more pertinently, that new housing should be created in proximity to employment opportunities.

Nearly all consultees, certainly amongst those opposing the proposed allocation, made the case that the many disused / vacant / inefficiently used brownfield sites in Stockport should be used first. Many consultees were concerned that the published pilot brownfield registers do not include all brownfield land and that development of brownfield sites is perhaps not always at as high a density as it might be. It was suggested that developers should be (financially) incentivised to use brownfield sites and that factory built system housing would make brownfield redevelopment more cost effective.

There was significant concern about the impact of the proposed allocation on the existing village of Woodford, its community and communities in neighbouring/nearby areas. Many people set out that the ongoing Woodford Garden Village development is all that the area can sensibly take, that there would be inadequate resourcing of public services to serve the new developments, that the needs of hypothetical new residents are being put ahead of the wishes of existing residents and that there would be significant disruption to existing residents along with a reduction in value of existing property. Furthermore, consultees were concerned about the loss of countryside as a leisure resource and the impact on recreational opportunities and

mental and physical health resulting from the loss of open space; particular concerns were raised about the impact on public rights of way and other routes through the area used by ramblers, birdwatchers, cyclists and horse-riders as well as concerns over the loss of dark-skies. Consultees also raised the potential for an increase in crime, concern that the proposal would not serve to reduce poverty and a lack of confidence in the Council's ability to ensure development created a socially and economically balanced and diverse community. There were also concerns regarding whether the proposal involved demolition or compulsory purchase of land / existing dwellings.

A large number of comments raised issues relating to the deliverability of the proposed allocation. With regards to the financing of infrastructure and other development costs a number of responses, particularly those made on behalf of landowners or developers, raised the need for caution over pooling of infrastructure and other costs because of the need to maintain compliance with the relevant regulations and to maintain development viability; contributions to infrastructure should be relative to each site/phase to ensure they are reflective of that site/phases impact. A number of consultees were concerned that (perceived) mistakes with previous development will be repeated, leading to unsustainable development. Nearly all consultees (developers/landowners aside) raised concerns that the geology of the area and its underlying aquifer make it inappropriate for development, pointing out that subsidence is a problem in the area (because of cohesive soils) and that drainage and the high water table are also problematic. Counter to that, however, agents on behalf of one landowner submitted reports detailing ground investigations which seek to demonstrate that development is technically feasible with relatively little difficulty. The issue of historic landfill within the proposed allocation was raised by a number of consultees, with the Environment Agency suggesting specific text to be added to the draft policy which would cover this matter. It was pointed out that sites in this location have strong market signals and pent up demand making them more likely to be delivered and potentially delivered quickly and early in the plan period to help ensure adequate supply; conversely, several people concerned about the impact of development suggested that the site should be delivered last of all sites in the GMSF. Some consultees questioned whether all of the proposed allocation can be viably developed given that a far higher number of dwellings could be achieved if the whole area was developed at 25 dwellings per hectare; others asked that the density of development across the allocation should be varied so as to reflect surrounding land uses and existing built form. It was also pointed out that it is necessary to provide evidence of deliverability to ensure that the plan is sound.

A number of comments also raised issues relating to the deliverability of development more generally, with the consequential impact of allocations such as this then being required. It was suggested that planning permissions should lapse after 3 or 5 years and that new houses should be required to be completed within a set period, thereby reducing 'stalled' sites impacting negatively on the housing supply position. Some consultees suggested that further consideration should be given to small and medium size Green Belt sites as they can potentially be developed at a faster rate, helping to ensure early delivery of new housing.

A large number of consultees suggested alternative approaches, strategies or development sites, in particular the suggestion that smaller urban extensions would be more appropriate and that smaller sites have been overlooked, that sites put forward under call for sites in the

wider area should be considered first and that the other proposed allocations in Stockport should be developed first (with one consultee suggesting that if each of the other allocations in Stockport took an extra 500 dwellings then OA20 might not be required). Some consultees suggested that they might be inclined to support the allocation if the strategy were for the new housing to be 100% affordable and/or only for first time buyers. It was suggested that a greater number of new homes should be built on the Woodford Aerodrome site as it is brownfield, including on the Cheshire East part of the runway. It was also suggested that the land south of Chester Road should be removed from the proposed allocation. One consultee asked why areas like Reddish Vale have not been considered instead when affordable housing is required and such areas have good access to the M60. A number of consultees suggested that re-evaluation of site selection methodology is required. A significant proportion of consultees suggested that the strategy should seek to realise higher density development in locations where supporting infrastructure already exists, thereby reducing the need for release of land from the Green Belt.

Many consultees were concerned about the impact of development of the proposed allocation on the environment. Disruption to wildlife habitats and corridors along with impact on biodiversity, nature, ponds, hedgerows, trees and migratory birds all raised multiple times. There was specific concern over the lack of environmental mitigation measures set out in the draft policy, the loss of land which functions as a carbon sink, increased air, noise and light pollution and rubbish, the disposal of surface water and the need to assess the impact upon the historic environment (noting presence of Grade II listed buildings). In particular the importance of protecting areas of priority habitat (with a suggested 15m buffer) and the need to consider the effect of development on the GM Ecological Network were raised. Proposals for green and blue infrastructure and retention of deciduous woodland were welcomed but consultees felt this needed extending to require their enhancement, extension and linking together. Concerns were also raised over the impact of development on views and vistas (including of the Peak District / Pennine foothills). There was also significant doubt that developers would have regard to innovative design in terms of resource efficiency or carbon emission reduction even if it were a policy requirement.

Nearly all consultees referenced the current status of land within the allocation as Green Belt. This mainly related to general concern over the loss of Green Belt, the loss of gaps between areas of built development, the loss of open spaces, urban sprawl and the detrimental impact on the ability of (retained/adjacent) Green Belt to meet its five purposes. Many consultees were of the opinion that the Green Belt in this location fulfils the 5 purposes set out in NPPF although, counter to that, one consultee expressed an opinion that had the allocation been assessed as individual, smaller parcels it would have shown that some areas do not meet any of the 5 purposes. Several consultees pointed out their view that the Green Belt exists for the purpose of protecting the environment. Several consultees questioned the findings of the Green Belt Assessment, claiming that it did not consider Woodford's role in separating built areas of Stockport from built areas (and proposed new developments) in Cheshire East, with others claiming that the assessment is "fundamentally flawed" because it undervalues the Woodford area in respect of all 5 Green Belt purposes, although no evidence was submitted to show that this was a balanced view in comparison to the assessment of other areas. Some consultees considered that the development of the site would be contrary to draft policy GM13 (Green Belt), whilst others claimed that the draft GMSF was unsound because

it proposed to release 34% of land in the Woodford Neighbourhood Area from the Green Belt. A large number of consultees made the case that exceptional circumstances to justify release of land from the Green Belt have not been demonstrated to exist whilst others referred to the success of Green Belt in constraining urban sprawl and encouraging urban regeneration, including mentioning London where the existence of Green Belt has not, it was claimed, constrained economic growth. Finally, it was suggested that the urban landscape should be filled in before the urban area is extended.

Infrastructure concerns were raised by nearly all consultees, in particular concern that there is a need for consideration of the cumulative impact on infrastructure of all developments in the area (including cross-boundary), that it would prove impossible to provide supporting infrastructure in a reasonable timescale or, as many consultees suggest would be necessary, before the development, and that there is inadequate social infrastructure (new schools, doctors, dentists, health centres, leisure facilities and shops) and scepticism as to whether it would actually be provided. Some consultees were concerned that the pressure to deliver new housing would outweigh quality, sustainable development which incorporates the necessary supporting infrastructure. Many consultees suggested that developers should pay for the full infrastructure requirements but a number of representations on behalf of landowners and developers were of the contrary view, setting out concern that infrastructure contributions must be "fairly and reasonably related in scale and kind" to make the development acceptable as required by national policy.

Concerns about transport infrastructure specifically were also raised by nearly all consultees, in particular the inadequate road infrastructure serving the area and the impact of development on existing (already congested and poorly maintained) roads and the communities they pass through or bypass. Consultees noted that the A6-MARR currently under construction is not designed to accommodate additional growth. A number of consultees were particularly concerned about the impact of additional traffic on road safety. Many consultees raised the need for adequate public transport service provision, especially (light) rail connections, car parking at local stations and orbital public transport provision (not just into the city centre). There is a need for a comprehensive public transport plan for the proposed allocation, with the suggestion that the SEMMMS Refresh must be completed and available to allow the GMSF to be properly considered. There was some scepticism as to whether adequate transport infrastructure improvements would be technically feasible or financially viable, with concern that the transport solution might be buses which are not considered an attractive option and that there are no improvements proposed in the locality by TfGM's Transport 2040 strategy. There was a specific suggestion that Metrolink should be extended from East Didsbury down / alongside the A34 to serve the proposed allocations in the south of Stockport along with clear support for provision of high quality walking and cycling infrastructure as required by the draft OA20 policy.

Other infrastructure concerns related to utilities, in particular that the current electricity and gas supply networks would be insufficient and that development would need to have regard to a water main, fuel-line and utilities easement(s) which run through the allocation. United Utilities suggested policy wording to ensure the Environment Agency guidance on hydrological risk assessments is conformed to given that part of the proposed allocation falls within a groundwater source protection zone.

Some consultees focused on the duty-to-cooperate set out in the National Planning Policy Framework (NPPF), claiming that there was need of a joint plan and discussions with Cheshire East Council (CEC) regarding the cross-boundary impacts of both GMSF and CEC's proposals. Some consultees suggested that discussions under the duty to co-operate should have found more sites outside of Greater Manchester, potentially much further afield.

A number of consultees were concerned that the proposed allocation was contradictory of other parts of the GMSF, in particular its strategy of minimising environmental impacts and reducing the need for travel. Consultees also raised contradictions between the proposals and information/evidence prepared for Woodford Neighbourhood Plan, including evidence that Woodford's housing need is 20-25 houses up to 2026.

The need, or otherwise, for housing was the theme of many comments, along with queries around whether the proposed allocation would meet any need that did exist and whether it was a local or wider need. Many of these comments focused on the type/tenure of housing for which there is considered to be a need, with many questioning whether the housing delivered would be (truly) affordable or suitable for older people down-sizing. There was a small amount of support for the proposed allocation subject to it being for a high proportion, or entirely, affordable and a small number of people questioning the extent to which requiring a significant proportion of housing to be for older people would support the needs of the local population. Consultees suggested that there is a need for starter homes but that they should be provided in other locations where young people wish to live - in towns and cities close to amenities, work and served by public transport. The draft policy's requirement for the incorporation of land to enable self-build plots to meet identified local demand and needs was questioned as, it was claimed, there was no evidence of need. Some consultees suggested that qualitative and quantitative information was required on how OA20 would specifically meet objectives relating to housing for older people, whilst some pointed to a possible contradiction between the allocation being an opportunity for high value housing and the policy's requirement for affordable housing.

Consultees also commented on the overall housing numbers set out in the draft GMSF and the implications of them for the proposed OA20 allocation. A number of comments put forward their own interpretation/analysis of the evidence base, suggesting that there was no need to release Green Belt for development until non-Green Belt land supply is exhausted, potentially not until mid-2029 and that OA20 is not required because the number of dwellings proposed within it is less than the margin of errors in the overall figures. Comments also identified suggested flaws including that the figures do not have regard to home-working, that the overall growth level does not have regard to Britain's exit from the European Union and that the occupancy rates used are too low / lower than present occupancy rates. Some consultees expressed a lack of confidence in the draft GMSF's content due to what they considered fundamental inaccuracies and inconsistencies, as well as complaining that it was not democratically prepared / too developer led (noting that sites had been identified by developers in the most valuable locations).

Whilst some consultees agreed that there is a need to build more homes to alleviate the current housing supply shortage, there was a widely given view that the level of housing / growth is unnecessarily high and beyond simply meeting housing needs, which is not

supported by evidence and therefore does not / cannot amount to the exceptional circumstances required to justify release of Green Belt. Likewise it was pointed out that the numbers are not dictated by national targets. There was a view that local housing need is already being met by the Woodford Garden Village development and that extra housing should not be planned in Woodford for 5 years after that development is completed, allowing time to see if more housing is needed.

Some consultees queried who the development was intended to benefit, suggesting that it would be of greater benefit to affluent neighbouring suburbs in Cheshire East whereas loss of Green Belt would be to the detriment of the people of Greater Manchester, with many suggesting that the policy needed significant change so as to take local views into account. Consultees also queried the policy's suggestion that the development underway at Woodford Aerodrome is successful on the grounds that that development is far from complete so any success is unproven. One consultee suggested an improvement to criterion 5 within the policy to say that "Where the site interfaces with existing built development and key road frontages, development will be expected to respond positively and complement the character of the area and ensure an appropriate design response in line with the requirements of the masterplan." (Criterion 5 currently reads "Be designed in order to minimise any adverse impacts on the Green Belt beyond the site, including through the use of significant landscaping, and ensure a reasonable buffer of land to be retained as Green Belt between new development and other existing/planned settlements."

Some, but a minority, of consultees expressed support for the proposed allocation or specific requirements of the policy. Firstly some consultees were keen to stress that their support must not be overlooked; that not all residents are opposed to development. Some were supportive of the proposed allocation as part of supporting the overall strategy, pointing out that it is important to consider Woodford as part of Greater Manchester, rather than as an individual community.

Supporting comments also referenced the proposed buffer between development and existing developed area, with some noting that the retained Green Belt around the allocation would still do the job of preventing urban sprawl and the merging of local communities and that the site's development would not be urban sprawl as it would not be attached to the existing urban area. There was some support for selective and sympathetic Green Belt release, including comments highlighting that the Woodford area does not score as highly in the Green Belt assessment as other parts of Stockport and that other areas are covered by non-Green Belt constraints which would severely restrict the extent of development.

Whilst still a minority, the most significant area of support came from consultees recognising the criticality of meeting housing needs, especially for affordable housing, with some noting that those needs cannot be met on brownfield sites alone and that high value locations such as Woodford are most likely to be deliverable, thereby making (an element of) affordable housing more viable.

There was support for growth of Woodford so that it might become more sustainable with its own facilities, with further comment that development could turn the area into a desirable place to live just as the development of Bramhall from the 1920s onwards has done. Some

consultees were of the view that there are more benefits in creating a new community than in retaining land for low intensity agricultural use. Supportive comments also set out that large allocations allowed a critical mass of new development that would allow infrastructure needs to be met - e.g. a new senior school - and that supporting infrastructure would also help meet existing needs which would enhance the allocation's sustainability credentials. It was suggested that the site is close to bus routes and well served by local train stations, although less positive comments said the opposite.

A number of the supportive comments, particularly and perhaps unsurprisingly those from landowners/developers, related to specific parts of the proposed allocation. It was set out that there were no legal or technical constraints to that part of the site north of Chester Road and west of Moor Lane being developed from 2019/20 onwards, with initial site investigations in the same area suggesting that the underlying ground conditions and aquifer are not insurmountable. Within that same area it was set out that farming at Hill Top Farm is no longer sustainable, that the land is not of high agricultural value or of outstanding amenity (its protection for such uses is a constraint on growth) and that no remediation would be required for an area of land previously infilled with inert waste materials (which have now settled). Similarly it was set out that land in ownership of Frederic Robinson Limited is suitable, available and deliverable as part of the comprehensive development of the wider OA20 site.

Supportive comments also referenced that ecologically valuable features can be retained in the required masterplan for the site and that any drainage issues can be sustainably managed.

A number of consultees asked questions:

- How could 2,400 homes be allowed when I can't get planning permission for an extension?
- Why is Woodford Cricket Club included in proposed development but Bramhall Cricket Club not?
- Why are Woodford Community Centre and War Memorial included in proposed development
- How will residents be compensated?

Finally, it was pointed out that the area of the allocation given in the policy text is wrong and that, it was claimed, the boundary of the allocation is not easily identifiable and defensible as it cuts through houses and gardens.

OA21 High Lane

Who Responded

There were 991 submissions to this section. These were from 841 individuals, 48 couples or other family groups, five unknown people (name not supplied/illegible).

There were seven submissions from politicians/political organisations:

- Cheshire East Council
- Disley Lib Dems

- Disley Parish Council
- Helen Foster-Grime
- High Peak Borough Council
- Hilary Stephenson
- William Wragg MP

There were seven submissions from developers/landowners:

- Billie, Katsouris and Stephenson (land south of Jackson's Lane A5143)
- KCS Development
- Mrs Lyn Ridgeway / Broad
- P J Livesey
- Qualmark Ltd
- Taylor Wimpey Limited
- Wainhomes NW Ltd

There were eight submissions from other organisations:

- Stockport Greenspace Forum (two submission)
- The Campaign to Protect Rural England, Friends of the Peak District & The NW Transport Roundtable (single submission)
- Environment Agency
- Friends of the Earth
- High Lane Residents Association
- Historic England
- Marple Civic Society

Summary of Issue(s) Raised

Comments included that there has been no air pollution analysis undertaken in the Draft GMSF and that there was a need to take into account relevant air quality targets.

There were also many comments expressing concern about existing air quality nationally, the specific impact of the allocation on air quality in the area (given existing road congestion at peak times) and the cumulative impact of nearby proposed allocations/developments on air quality.

There were several comments that the site contained high quality agricultural working land (grade 3a and above) and the need to retain such land.

A common theme was that no evidence had been provided within the draft GMSF to demonstrate that all brownfield sites, or Greenfield sites outside of the Green Belt, had been fully considered. Criticism was made that the Pilot Brownfield Register held by Stockport Council is not up to date and its list of sites is therefore not comprehensive, nor had consideration been given to the Brownfield sites not yet identified, but which were likely to become available for redevelopment in the GMSF plan period.

A Brownfield First approach was emphasised in the comments with many also responding that Stockport was being expected to take more than its fair share of housing. Scepticism that

developers were often land banking brownfield sites and deliberately stalling on sites with permission for housing was often mentioned.

Some brownfield sites but more often the types of brownfield sites to be put forward instead of the allocation were mentioned.

Concern was expressed that financial constraints may make the proposed allocation unviable. Thus there was scepticism whether infrastructure, affordable housing and community requirements would be delivered via masterplanning. It was felt by many that the GMSF was weighted in favour of developers, with no incentives for them to develop brownfield first. It was also claimed that the GMSF had not considered alternatives to the site and it was questioned whether the Council had secretly entered into agreements with developers.

Criticism was made that as there is no reference to the use of sustainable urban drainage systems within the allocation despite support being provided by GMSF policies GM18 (Flood Risk) GM25 (Allocations) and GM12 (River Valleys and Canals).

Concern was expressed that a reduction in green space would lead to change to the water table and increase flood risk especially given the existing frequency of flooding events in the locality, as the proposed allocation contains several main river watercourses.

It was also mentioned by many that the removal of trees, shrubs and grassland and climate change would affect the ecology of the area and the stability of surrounding land, risking landslip and exacerbating poor existing drainage and increase localised flooding. Existing roadside drains were described as insufficient.

Concern was expressed at the lack of evidence provided for the Statutory Duty to cooperate, with Cheshire East Council or Derbyshire County Council especially, as many parts of these neighbouring areas have the potential to serve GM markets, including Manchester Airport.

Concern was also expressed that no evidence had been presented to show that neighbouring authorities cannot accommodate extra housing, or that the GM boundary represents a 'functional economic area' with no cross-over.

Many were concerned about the impact on wildlife, ecology and wildlife relocation issues relating in particular to badgers, foxes, bats, numerous species of birds and birds of prey, red squirrels, aquatic species, reptiles, Great Crested Newts and the wildlife food sources for amphibians, dragonfly and fish.

It was suggested ancient woodland should be excluded from the allocation (Woodland Trust) and that a full ecological survey needs to be done and all species should be assessed before a final decision is made about the site.

Comments were made that considered the proposed allocation is at odds with several UK/EU habitat directives. It was stated that Cheshire Wildlife Trust (where applicable) and Defra should be engaged to survey the draft allocation.

It was mentioned that all viable minerals would need to be surveyed, extracted (clay and coal were specifically mentioned) and the site remediated before any houses could be built and that policy should be introduced to ensure this happened.

Concern was expressed that the loss of trees associated with A6MARR and development of the site would increase carbon dioxide levels, as would the new housing, thereby contributing to global warming. The comment was made that the carbon reduction target of 60% by 2030 (GMSF paragraph 18.0.4) failed to reflect the ambition in the Paris Agreement to aim to keep the rise in global temperatures to below 1.5 degrees. It was mentioned a science-based target of at least 80% by 2030 should be adopted.

It was mentioned existing services such as schools, health care and shops are of insufficient capacity with insufficient places already and thus unable to meet the additional population demands, consequently, staff to pupil ratios could be even more negatively affected with additional housing. It was mentioned that the draft allocation would need to include a minimum of three new Primary Schools and a new Secondary School. High Lane was mentioned as not having a secondary school the nearest being Hazel Grove or Marple.

It was stated there was no mention in the draft allocation of any employment opportunities and that those of working age would have to commute considerably longer distances as local employment opportunities are very limited. Comment was made that the viability of existing smallholdings, farms and equestrian businesses in Woodford would be harmed by the draft allocation.

A number of people stated that the existing environment is relaxing, adds to the quality of life and that the proposed housing will ruin this for future generations. Also consistently raised were that the character of the village will be fundamentally changed and that people moved here in the first place to enjoy a semi-rural lifestyle.

Some support was forthcoming to reference in the GMSF the protection and enhancement of green/blue infrastructure on the site. It was mentioned there should be a provision of a corridor of natural habitat around the Macclesfield Canal and the stream to the South of the site.

It was mentioned there were several historic landfill sites within the proposed allocation and that the draft allocation policy should for include site investigation and remediation for redundant and active landfill sites as part of any development.

It was mentioned by many that the scale of the proposed Green Belt loss was not supported by evidence and that, as the site was lacking in transport infrastructure it did not represent a sustainable pattern of development. Some people considered the draft allocation did not accord with the aims of paragraph 2.0.5 of the draft GMSF in this respect. A common view expressed was that the Draft GMSF supporting evidence base does not support this allocation with allocations driving the strategy rather than the other way round and that the draft allocation should come from sound evidence base. There was a strong view that

continued opposition to the draft allocation would occur until a wholesale review of the GMSF was undertaken.

Widespread concern was expressed that the proposed allocation was contrary to the purposes of Green Belt, that it did not have defensible boundaries as these elements had not been adequately assessed.

Concern was expressed that housing is contrary to paragraph 89 of the NPPF, that housing need is not a very special circumstance to allow development and that no exceptional circumstances exist for taking the allocation out of the Green Belt.

The requirement for the Green Belt to provide over 30% of the conurbation's housing needs was also questioned, with Stockport's share also considered unfair. The common view expressed was the Green Belt had to be protected at all costs. However the view was also expressed that other areas of the Green Belt should be considered first.

There was also an individual request to move the Green Belt boundary to take plot out of the Green Belt.

Strong concern was expressed that local GP health services and Stepping Hill Hospital were already at breaking point and could not keep up with demand with long waiting lists evident and provision could not keep up with new housing/population. The uncertain future of the A&E at Macclesfield Hospital was also mentioned.

Other issues mentioned concerned the impact on health from increased pollution associated with the draft allocation, with links to dementia mentioned as well as to the impact on wellbeing and mental health from the loss of green space especially on children. The proposed allocation was mentioned as being as being contrary to Policy GM22.

The impact of the draft allocation specifically on Macclesfield Canal (Conservation Area) was mentioned, which is used by boaters, fisherman and walkers, together with the impact on wildlife. The Canal and Rivers Trust have asked to be involved in the masterplanning of the site and have requested that policy should make provision for financial provision towards mitigation measures.

It was claimed there had been no apparent assessment of effects of the draft allocation on historic environment as required by NPPF and Historic England's Advice Note 3 and no demonstration that housing numbers can be met without heritage impact and that therefore the allocation was unsound.

There was a basic objection to the use of the draft allocation for housing, including a loss of property value and whether properties might become subject to CPO.

There was some support though for the provision of affordable housing although it was also suggested that the area currently has a high level of home ownership and there was concern

that affordable housing would comprise a large council estate that may attract ‘the wrong clientele’.

There was criticism however that there was no information provided on affordable housing including how this was defined and the proportions involved.

Many comments were received that the location was more likely to provide for executive 4-5 bedroom homes, especially given the examples of housing sites under construction at Woodford and Mirlees, than affordable development for first time buyers, the elderly and young people, and that it was small starter homes, apartments and bungalows that were needed. Doubts were expressed whether housing need assessment has included surveys to find out what people in High Lane need.

Some supported higher densities for the draft allocation; however, others considered that densities of 50 dwellings per hectare would be out of character. Many more stated higher densities should be put forward for the town centre, where specifically the development of flats / high rise should be considered.

The view was expressed several times that the draft allocation should not be built out until, the High Lane - Disley bypass, the tram extension along the Middlewood Way and additional rail links are already in place and educational and retail locations identified.

It was considered that if Green Belt land is released immediately, developers would build there first, to the detriment of urban regeneration so the draft allocation should be planned in phases with provision for reduction, if suitable brownfield sites are found elsewhere. It was also considered by some that relying on fewer larger Green Belt sites would slow down build with the GMSF target of 333 dwellings per hectare unable to be met. Additional Green Belt land might thus be required which was not supported. Linked to this argument was the view expressed by some, that a smaller allocation should be put forward as part of a package of smaller Green Belt sites perhaps as extensions to the urban area.

This reflected the view put forward that the allocation of 4000 new homes (160% increase) would triple the size of the village and was completely disproportionate and would make High Lane into a town thus losing its village appearance and would destroy the existing community.

It was stated by many that justification of the precise figures behind the housing requirement and projected growth were unclear, and even small reductions in housing need figures would reduce the need for the allocation. The view was also expressed that the overall housing numbers and relating to the High Lane draft allocation were based on flawed calculations and should be revisited and downgraded in light of Brexit and uncertainties over HS2. In particular the higher birth rate to death rate and a net migration were viewed as now outdated. Thus it was considered the Combined Authority would need to defend the robustness of housing need as it finalises the GMSF.

No justification, it was felt, had been put forward for the 2.5% high growth option underpinning the housing figures or the projection of a 17,000 population increase over the next 20 years for Stockport other than as a reflection of the politics of the Northern Powerhouse. The housing market justification in the GMSF was also questioned. As a result suggestions for additional housing for the draft allocation put forward varied from 200 to 500 new homes.

There was criticism that smaller sites put forward under call for sites near High Lane have been ignored and that the Draft GMSF allocation does not coincide with the draft allocation put forward with only 17 of Stockport's sites (11% of total number) being located within the proposed allocation. It was also mentioned the majority of the draft allocation could not be considered to be deliverable until it was demonstrated that the land is available and is being actively promoted for development.

A 20 year plan was mentioned as too long a time period in a volatile economy given the need to only demonstrate only a 5 year supply and thus the GMSF should be shorter and cover a shorter period.

The cumulative impact on High Lane was also mentioned by several people with 970 new homes at Woodford under construction, a further 1,750 proposed at Handforth and 600 at Poynton as well as proposals for additional housing in Derbyshire in the Goyt Valley.

The lack of capacity of the existing road infrastructure and the resultant traffic jams were consistently mentioned.

Concerns were expressed whether existing infrastructure in the area has sufficient capacity and is sufficiently modern in its specification to provide for the needs generated by the proposed allocation, in particular for utilities, broadband and social infrastructure (some also made reference to schools, health-care facilities, policing and emergency services). It was also questioned whether the necessary infrastructure could be delivered within the lifetime of the GMSF.

There was concern over the landscape being further eroded following construction of the A6 MARR. As well as the need for brownfield first, it was also mentioned that brownfield sites of community or ecological value should be designated as local green space with public access.

Views over public transport in relation to the proposed allocation centred around the lack of current options to provide efficient public transport to the town centre, which was considered important given the high level of elderly population locally. Public transport in the area was described as very limited, expensive, out of date and requiring substantial improvement before housing could be delivered. There is no Metrolink serving the area and infrequent, unreliable public transport services both by bus and train. There is also no train service from Marple to Stockport and no direct bus service from Disley to Marple. Concern was also expressed about whether public transport in the area will be adequately funded to keep it in operation.

It was mentioned the Green Belt in this location was easy to access for those without car. Concern was also expressed that the draft allocation falls outside the walking catchment of existing facilities and does not promote cycling and walking. Thus the provision of safe cycle routes from High Lane and Marple towards Stockport and the Peak District was suggested.

The impact of draft allocation on road safety, particularly for vulnerable people was mentioned by many, with the need to create new junctions onto roads which are already at capacity and in poor state of repair.

Apart from the lack of existing retail facilities concern was expressed that journeys to the larger retail facilities, including major supermarkets, and to leisure facilities that fall outside the local area, will contribute to traffic congestion.

It was mentioned by a few that the topography of the site meant that building of the scale envisaged could not be accommodated successfully and generally made walking and cycling unsuitable for the proposed population.

It was mentioned generally there has been a substantial increase in traffic on the A6 since 1960 and that traffic congestion, particularly at peak times, would be exacerbated by the proposed allocations and would be further exacerbated by the additional traffic to the A6 resulting from the A6 MARR, including during its construction. It was thought by some that the A6MARR was merely an excuse to open up development at High Lane. It was also thought future residents were more likely to be reliant on car use, because of the distance to the railway stations at Disley, Hazel Grove and Rose Hill.

It was stated the Draft GMSF does not align with the Greater Manchester transport plans outlined in the TfGM Transport 2040 document or reflect the train capacity issues outlined in DOT Report of November 2015 on WCML capacity and pressures on the system. A need for a bypass for High Lane continuing to Bredbury and Reddish was specifically mentioned as the A6 MARR running east-west would not address traffic issues because the traffic in the area largely moves in a north south direction. Without a bypass congestion would be increase. It was also mentioned that because the A6 MARR was designed before the GMSF and because the final section is not even under construction it could not adequately address traffic congestion in the area.

OA22 Land of A34

Who Responded

There were 411 submissions to this section. These were from 379 individuals, 18 couples or other family groups, and one unknown person (name not supplied/illegible).

There were three submissions from politicians/political organisations:

- Cheshire East Council
- Helen Foster-Grime
- MP Mary Robinson

There were two submissions from developers/landowners:

- Bloor Homes (North West)
- Strategic Land & Leisure (SLL) re land at Stanley Road, Handforth, lying to the west of the Seashell Trust MEDS, fronting Stanley Road

There were four submissions from other organisations:

- The Campaign to Protect Rural England, Friends of the Peak District & The NW Transport Roundtable (single submission)
- Environment Agency
- Friends of the Earth
- Historic England

Summary of Issue(s) Raised

The comments predominantly focussed on there being insufficient infrastructure to support the site coming forward, including social infrastructure i.e. schools, health facilities etc., transport and green infrastructure. Water pressure in the area is also commonly reported as poor.

Suggestions made to have a number of additional houses in the village with mixed housing and light industry, offices, and warehousing so that more people can work locally and avoid having to travel to work by car.

Particular concerns have been raised over the loss of recreational facilities (playing fields and rights of way) being eroded and the level of wildlife being extinguished.

There were concerns about the loss of biodiversity if green belt is released.

Flooding of the land is already a common occurrence given the clay soils in the area.

Major concerns were expressed in terms of pollution mainly from traffic and impacts on health. It was felt that there is a lack of clear overall transport strategy. The SEMMMS refresh must be completed and available for all to see before decisions taken. The GMSF does not align with the Greater Manchester transport plans outlined in the recent Transport 2040 document.

The allocation does not comply with the four key objectives set out in paragraph 4.16 of the GMSF methodology document: '*being adjacent to the existing urban area; ensuring the provision of a strong and defensible boundary; having no known environmental, physical ownership of viability constraints; minimising the impact on river valleys and uplands*'. The methodology is flawed and due regard should be had to more appropriately located parcels of land put forward during the call for sites exercises.

Concerns raised that the Draft GMSF has not considered reasonable alternatives to the site and evidence base does not support this strategic allocation.

Topic Based Responses

Alternative Strategy

A 20-year land supply for housing is too much a 15-year land supply would avoid most of the proposed Greenbelt release and allow for alternatives.

An alternative strategy of development near public transport infrastructure routes should be considered.

It was generally questioned whether alternative sites are available, and specific reference was made to the following locations:

- The Simon Carves site in Cheadle Hulme has been an eyesore for many years and additional housing could be developed here.
- There are many areas close to the Heald Green/Wythenshawe area that could be utilised. One in particular is the large area on Simonsway/Styal Road.

Brownfield First

A variety of comments were made on prioritising the use of brownfield land, with specific support given for the provision of affordable housing on brownfield sites.

Urban regeneration and smaller urban extensions would be more appropriate / many brownfield sites in the region including mills, vacant town centre offices, vacant employment land / vacant employment uses which should be used for housing. There is a large increase in brownfield sites available for housing according to research published by the Campaign to Protect Rural England, which could provide at least 1.1 million new homes. Great opportunities exist around the Hillgate/ Market area of Stockport, avoiding the need to use greenbelt and bringing life back into the historic heart of the town.

The Brownfield Pilot Registers do not include all brownfield land that could reasonably come forward in the lifetime of the GMSF.

Brownfield sites closer to Manchester City Centre should be used to correspond with northern direction of traffic.

Any brownfield sites identified of community or ecological value should be identified as such and designated as local green space with public access, so they provide a community benefit.

Community Amenity and Services

There are concerns over the scale of development in Heald Green and threat of ‘over development’ which will change nature of community. There would be an impact on community cohesion / identity of the area / character of the area and impact on overall quality of life of existing residents.

Safe places for children to play are needed with this proposed level of development. Open spaces should be identified and protected, generous areas of open space can be accommodated across the site. The loss of playing fields and open space can lead to childhood obesity and impacts on mental health. The back of Hilary Avenue within site is used by all the local children for football and golf etc.

Recreational benefits of green belt will be lost, disruption or loss of bridleways and footpaths used for rambling and dog walking.

Allotments need to be increased in the areas of the development.

The existing social infrastructure (including schools, health and sports facilities) are at full capacity, there is no secondary school in Heald Green, existing facilities are already oversubscribed and in high demand, residents struggle to get health appointments without new housing. Plans need to take account the impact on these services and the provision of new social infrastructure.

The provision of a small local centre and associated facilities is welcomed however we consider the case for the defined need as claimed on page 222 of the GMSF to be unfounded.

[Compulsory purchase](#)

Objection was made in relation to the scale of development, in particular using compulsory purchase of farms and other businesses.

[Cross Boundary Considerations](#)

Numerous comments questioned whether cross boundary issues had been considered.

There is cumulative impact of major committed and proposed housing developments / allocations in the wider area (including North Cheshire Growth Village, Bollin Park at Wilmslow, Woodford Aerodrome, land next to M&S on the A34, Sea Shell Trust housing proposal and other Draft GMSF strategic housing allocations) on loss of green belt, traffic congestion, pollution and social infrastructure. Out-of-Centre retail proposals at Handforth would contribute to cumulative impact on traffic congestion.

There is a lack of strategic joined-up planning. The green belt in South East Manchester will effectively have been eroded (with no open spaces remaining).

The lack of consultation with neighbouring areas in Cheshire East who plan a garden village which would add to the congestion on A34.

Wilmslow Town Council is concerned that traffic impact surveys do not convey a holistic approach which takes into consideration all proposed sites collectively AND encourage greater joined-up thinking between Greater Manchester and Cheshire East Council.

Design /Heritage

Infilling could ruin the character of the village while estate development would overwhelm it.

The site is adjacent to a number of grade II listed heritage assets, the allocation has not been informed by any assessment of effects upon the historic environment.

Employment/Economy

The attractiveness of Cheadle Royal Business Park could be reduced, owing to additional congestion Local businesses will suffer as a result of increased traffic congestion.

Flood Risk

The land is higher than the surrounding houses which could lead to flooding if it is developed.

The removal of trees, shrubs and grassland would make the surrounding land more unstable and compound poor drainage and cause flash flooding, clay soil is predominant. The land is not suitable for building on very easily as it has been used for tipping, has a fuel line and high pressure water main running across and due to geological features is prone to flooding.

Land on site already floods / poor drainage / would make flooding worse. There is insufficient infrastructure to cope with flood risk.

The fields floods with surface water frequently, particularly the land around the football club at Cross Road. There is a high water table in the site. During the winter, seasonal springs can occur on the fields proposed for development.

Consideration must be given to disposal of surface water in the most sustainable way.

Green Belt

A large number of comments expressed concerns about the loss of green belt to housing development.

The green belt review scores the parcels of green belt on this site as moderate to high it should therefore remain the green belt.

Stockport has an unreasonable share of the GB release burden. There is too much loss of green belt in Heald Green. 78% of Heald Green's green belt will be lost (with figures of 90% also being quoted). Development outside brownfield sites should be small scale.

The loss is contrary to the purposes of green belt (e.g. sprawl, merging with Manchester Airport - itself expanding, Handforth, Cheadle Hulme and Wythenshawe, loss of openness etc.). The proposals would lead to a loss of green gaps between neighbouring towns.

Removal of this scale of green belt would call into question the integrity / permanence of green belt.

It would create a loss of green gaps. Seashell Trust is already hoping to sell their land in the area, this will therefore end up more or less joining Cheadle Hulme, Handforth and Heald Green together.

The Integrated Assessment findings do not support scale of green belt loss.

The scale of objections from residents over the loss of green belt should be a key factor in the process.

High levels of projected housing growth and the need for economic growth do not on their own provide exceptional circumstances for changing green belt boundaries.

Green Infrastructure

It is important that green infrastructure/landscaping is not only extensive but of high quality. This should also include green infrastructure based SUDS. A significant woodland belt should also be created adjacent to the A34 to reduce noise and air pollution.

Reference to GI and reducing surface water should be strengthened to include reference to green/soft sustainable urban drainage systems and the enhancement of Bruntwood Hall Brook which is a designated Main River. Development should incorporate measures to mimic natural drainage through the use of green sustainable urban drainage to control the rate of surface water run-off. Provide a key green infrastructure corridor through the site from the enhancement and naturalisation of Bruntwood Hall Brook which integrates with future development and maintains a significant area of open land around it, this will be crucial to wildlife and the wellbeing of ALL Greater Manchester residents.

Consideration should be given to building a park between Woking Road and the Manchester-Crewe railway line so a balance between development and green belt still exists.

Concerns over loss agricultural land, increased food production is far more serious question than ‘non-sustainable’ over development.

The plans would lead to the loss of hedgerows and meadows and habitat for badgers and trees. The removal of trees, shrubs and grassland that contribute to carbon absorption would impact on ecology, make the surrounding land more unstable increase in noise, light pollution (also impact on dark skies) and air pollution / impact on air quality. The site incorporates areas of priority woodland habitat, a minimum of 15m buffer between this and development is required to protect habitat. Consideration must be given to how development of this site would affect the Ecological Network for Greater Manchester.

Under the UK Bio Diversity Action plan, councils have a duty to protect wildlife. This area is home to a large and diverse number of plant and animal species impact on the wildlife in a country where 1 in 10 species are in danger of extinction as per the State of Nature report.

A question was raised about who monitors wildlife.

Ponds in the area support Great Crested Newts (Area SE of the railway line at Gillbent and the area west of the railway line).

[*Housing Need, Distribution and Affordable Housing*](#)

No justification has been presented for the choice of a high growth option, other than it aligns with the ambitions of Northern Powerhouse (NP) Developers Profiteering (could result in bias comments from developers on Draft GMSF regarding housing target and green belt location of proposals). Request for reconsideration of the projections which the representation considers to be unsubstantiated figures.

GMSF argue that economic growth equals household formation. No such link exists as household formation is based on population growth. In the last 20 years the population of Greater Manchester has grown by 133,000 and in Stockport by 6,000. The whole building programme for GMSF is based upon an assumed economic 2.5% pa growth rate. However based on OFFICIAL STATISTICS the expected population growth to 2030 is only 12% not 35% (GMSF prediction) to 71m from 64m. The whole building programme for GMSF is based upon an assumed economic 2.5% pa growth rate.

The calculations underpinning the number of homes needed should be reviewed. The occupancy rates used for Stockport are lower than our present occupancy rates.

It was questioned whether the housing target needs adjusting for implementation of Brexit /immigration. Green belt land should not be re allocated until these numbers have been confirmed and all other sites are developed first. Questions whether the housing target for the area is needed; uncertainty of assumptions made (including growth and population) that form the basis of the housing target.

Regarding the distribution of sites, comments were made suggesting sharing out the housing numbers more equally than as currently proposed. Proposal should be scaled down and spread evenly across the borough. Minimal allowance for windfalls means that there will be significant over-allocation of sites

Concerns were expressed regarding deliverability of this scale of development, and that housing need will not be addressed.

Regarding the provision of affordable housing, it was felt that this needs to form part of the outcome, (both to buy, part-buy and to rent) and social housing, particularly for smaller families as well as for single people and couples. Heald Green has no shortage of larger 4 and 5 bed dwellings. There is agreement with the proposed plans for the Stockport Borough on

the premise that the homes built include enough homes that can be purchased by families on average salaries. The delivery of affordable homes should take place alongside the market dwelling completions.

The potential impact on house values is noted.

On the issue of housing density, it was suggested that the only option is to build up with affordable housing, in the centre of the larger towns in particular much should be for rent at restricted rates.

On the issue of the mix of housing, a comment in support of the site suggested a mix of housing could be delivered, stating that the site's size is such that there is potential for a mixture of house types and tenures including market and affordable properties.

Landscape

The plans would put a blot on the landscape, there will be impacts on householder's view (due to loss of fields, hedgerows and trees). There will be a loss of rural feel resulting from loss of cattle grazing areas. GMSF states the Pennines and countryside is one of the important locations for tourism, yet these plans will destroy greenbelt land forever.

It was felt that the Bolshaw School will be ruined because its village setting will change.

Noise/Pollution

Specific concerns were raised about how more traffic would lead to pollution entering houses and impact on health due to rise NO₂ emissions. A6-MARR planning has documented that air pollution has been measured to be well over the limit on a daily basis, based on readings at Disley and outside Hazel Grove Civic Hall. The temporary construction work would also cause disturbance to residential amenity.

Retail

The planned out of town shopping centre will knock the heart out of Cheadle Hulme.

Transport and Traffic

Traffic impacts and transport capacity are not addressed. All the traffic to the proposed site is funnelled along two roads. Any increase in local traffic would add to the daily gridlock and cause a huge increase in noise and air pollution. The specific areas are of most concern:

- B5358 Wilmslow Road, in particular at the Finney Lane / Etchells Road junction, and the roundabout where the B5358 joins the A34 bypass at Cheadle Royal Business Park.

- Gatley Lights (A34/A560 Junction) are in the top ten most congested junctions in the country. Additional traffic from the SST development will only exacerbate this problem. Improvement to A34 -A560 junction will be needed.
- Traffic can be backed up from the village down Ravenoak Road, Church Road, and Gillbent Road as far as Stanley Road.
- Finney Lane / Etchells Road junction, the roundabout where the B5358 joins the A34 bypass at Cheadle Royal Business Park and the intersection of Finney Lane with Styal Road.
- Vehicles backing up onto the M60.
- The main routes of Finney Lane, B5358, A34, Styal Road and Simonsway are congested and lead to rat runs around the side streets.
- The creation of an access point to the west of Eden Point will not reduce traffic north and south of this roundabout, it will increase it. The already heavily-congested Stanley Green area will become further clogged.
- Traffic headed for Heald Green is frequently backed up down Finney Lane as far as the Griffin traffic lights on the old A34.
- The queuing into Bramhall more than often, is tailing back on Bramhall Lane South beyond Robins Lane and is not attributable to the A555 road works.

The traffic congestion / traffic flow will affect access for emergency services. Access to the nearest motorway junctions is via these busy roads. The high costs of the proposed houses will result in them being bought by high earners only, who will then be two car families increasing increase the pressure on roads. Rates of travel will increase to sites of employment.

It is not considered that the A6 MARR will relieve north-south traffic and congestion on Wilmslow Road. The recognition within the report that the A34 currently suffers from ‘severe congestion’ is welcomed, which will remain a significant issue even post-2017 and the opening of the A6-MARR.

Suitable mitigation measures which are deliverable and affordable are required to reduce the identified impact. At present there are no proposals as to what mitigations are possible or deliverable. Need to complete A555 Manchester Airport Relief Road round to the M60, improve the A34 Cheadle/Gatley junction and reduce number of roundabouts for north/south bound traffic on the A34.

Significant investment in roads, transport etc. would be required. Additional traffic will also have a negative effect on the quality of the roads. Many have not been resurfaced for decades and are in a poor state of repair.

Impact of expansion of Manchester Airport on Heald Green will encircle this area and generate even more traffic, more noise and air pollution.

Transport infrastructure Investment is needed including modern cycle lanes which are fit for purpose.

Current wording does not provide sufficient confidence that infrastructure is being / will be addressed; access to A34 is being prioritised over cycle/walking links - public transport / highways are key to site delivery but current ideas lack specifics of infrastructure need.

It was requested that the A34 study work and SEMMMS refresh be completed, published, consulted on and agreed; in doing so it should identify the measures necessary to remove the severe impact of any development of these sites; the costs associated with any identified measures and how the traffic measures will be funded along with the timescale for implementation.

Particular concerns were raised in relation to this site and the provision of sustainable transport options.

Many felt that there is limited public transport provision - (poor in some directions) / no Metrolink / no nearby railway. Need to consider the walking distances between train/tram services when planning bus services. Services should run later and more frequently.

There are no proposals for an increase in infrastructure facilities such as a new rail station on the Crewe line or an extension of the Metro Tram routes. There is no mention of the possibility of new railway station between Handforth and Cheadle Hulme. A Tram is needed not just into Stockport itself but also a tram line linking Woodford, Bramhall, Cheadle Hulme and Cheadle with the line at Parswood Didsbury.

Plans for public transport infrastructure should be in place before housing plans are finalised. Transport infrastructure will mean massive cost and lengthy implementation time.

There is nowhere to park at Heald Green Station. To get to Stockport you either have to go to Wilmslow or Manchester and change to get a train back into Stockport

There are very few roads between Heald Green and Stockport suitable for dedicated bus lanes.

Public transport in the Heald Green area is currently poor – especially after the halving of the 130 Bus service to Manchester and also the reduced frequency of the 368 / 369 service to Stockport.

Are there any plans to extend the Metro or increase the number of trains or buses – or to create more park and ride car parks?

Outside the rush hour ONLY the local public transport consists of:

- Two buses an hour into Manchester (X57) and two an hour into Stockport (378).
- One train an hour from Bramhall, via Cheadle Hulme and Stockport to Manchester – the station car park is virtually always full.
- The nearest Metro (which is excellent) with park and ride is East Didsbury – and the park and ride is almost always full during the day.

There is a loss of opportunities for walking and cycling in rural setting.

The statement regarding the proportion of employees of Manchester Airport who walk to work is low and is un-evidenced.

Comments were made regarding road safety concerns, especially for children and elderly, with significant impact upon road safety due to the need to create new junctions onto already capacity roads.

[Utilities](#)

Water supply under pressure already with pressure drops experienced in the area particular the southern end of Heald Green suffers from low water pressure.

Electricity and gas supplies date back to the early/mid-20th century and were never designed to cater for the modern energy consumption levels.

Several sewers cut through the site. Also there is an existing UU easement which will need to be considered.

[Phasing/policy wording](#)

The allocation policy needs to be more precise - around X dwellings is too vague. The provision of social infrastructure and transport infrastructure should be phased with housing development.

The land around Outwood House on Wilmslow Road, to the west of the school for the Deaf represents an ideal opportunity to release land in advance of the strategic allocation. The site is already enclosed by existing and ongoing development and in reality serves no green belt purpose. The site could be released now to meet existing housing needs in Stockport without prejudice to the outcome of the GMSF consultation.

The speed of development and house sales rate / occupancy will be speeded up significantly by allowing different developers, with different flags, to develop a site. Creating flexibility in granting planning consent to allow or encourage multi flag development is very important. Site owned by Strategic Land & Leisure (SLL) should come forward early.

There is support for the allocation providing that some sites on edge of urban area within allocation might be brought forward in advance of wider allocation.

Page 223 refers to the Seashell Trust. Whilst we admire and support the excellent work delivered on site by the School and its teaching staff we are not aware that it has yet achieved world renowned status as stated. We agree it provides specialist high quality education for specific needs, however applying a status to it which is not evidence based may lead to the conclusion that the sale of any surplus land is approved. We would want to make it clear that this is not the case at the time of writing.

Comments in Support of the Site

The green belt currently designation has long been far too restrictive for the house building we now need, we need to ensure that affordable new housing is built where people actually need and want to live. The site has excellent public transport links

There are excellent public transport links.

The parcel between A34 and B5094 Stanley Road represents a logical 'infill' site which does not fulfil any meaningful green belt Role.

The site within the allocation which is bound by Stanley Road and the residential dwellings which front on to Stanley Road to the north, Stanley Hall Farm to the east, the A555 road to the south and a hotel to the west and is adjacent to the proposed allocation OA22 and is approximately 2ha in area. It currently used for agriculture / storage. The site is considered to be viable for the proposed use and not considered to serve a meaningful green belt function.

The site is relatively flat land and is surrounded by an established residential area.

31 hectares of land controlled by Bloor Homes could be expected to accommodate in the region of 600-700 dwellings. The delivery of affordable homes will take place alongside the market dwelling completions. The site's size is such that there is potential for a mixture of house types and tenures including market and affordable properties.

Generous area of open space can be accommodated across the site.

There are no known physical or infrastructure constraints which cannot be overcome or mitigated. The site is relatively flat land for development and surrounded by established residential areas.

OA23 Heald Green

Who Responded

There were 494 submissions to this section. These were from 437 individuals, 37 couples or other family groups, and two unknown people (name not supplied/illegible), and one developers/landowner; Gladman Developments Ltd.

There were three submissions from politicians/political groups:

- Cheshire East Council
- Helen Foster-Grime
- MP Mary Robinson

There were submissions from two other organisations:

- The Environment Agency
- Friends of the Earth

Summary of Issue(s) Raised

The following is a summary of the issues raised by commentators on the GMSF document:

There were several comments around the loss of agricultural land with queries on the levels of assessment done to identify Grade 3a. In terms of the Airport there were concerns stated around noise and open areas for planes to crash land in. Several alternative sites were suggested and have been addressed in the responses.

There was a high level of requests for knowing how brownfield sites have been assessed since it is the common belief that there is more brownfield available out there with a few sites suggested, all of which have been considered (see responses).

The loss of business in the area from the Nursery and the Farm were of concern with one training firm based in the area stating that they would have to move their business.

There were many concerns around the provision of community services which are already struggling, including health, education, fire and police services and in particular the loss of the local sports facilities. Community amenity in terms of both open space (including local walking places in the Green Belt) and the vitality of the local centre were of great concern. Older people in particular are concerned about the loss of green space on their doorstep for easy access.

A few were concerned about the likelihood of the use of compulsory land purchase. Several people asked about how the developments in Cheshire East were being taken into account, against the backdrop of the Woodford development. Also questions were asked as to why Manchester City Council does not have any major sites given the recent extension of Metrolink in Wythenshawe.

There was scepticism about the deliverability of sites given that house builders nationally are not delivering the levels and types of housing needed. Questions were asked about the mechanisms to fund not just the development but all the associated infrastructure (including Green and Social Infrastructure).

Major concern over existing oversubscribed schools and new schools not being properly provisioned with teaching staff given the national state of the Education system. Air Quality was a major concern on the school run.

Not everyone works at the Airport was a common statement, with suggestions of mixed use development to provide local employment as a way to tackle congestion and pollution. In addition providing work for residents living in any affordable housing that may be developed and might not have the wherewithal to travel far for work. There are 70 jobs at the nursery that would be at risk if this development replaces the nursery.

Major concerns in terms of pollution mainly from traffic but also concerns about the loss of biodiversity if Green Belt is released. Flooding of the land is already a common occurrence

given the clay soils in the area with some interesting and potentially useful information on historic underground waterways which could inform development design. Water pressure in the area is commonly poor with temporary loss of water supply a frequent (once every six months) occurrence according to many.

The scale of loss of Green Belt was questioned by the majority with figures of 78% loss cited as unacceptable – once it's gone, its gone being the main concern. All the associated loss of amenity and open space, as well as loss of biodiversity and flood management capacity of open land were cited as concerns, including the potential loss of sports facilities such as the football pitches.

Lowering of house prices in the area concerned a few, with scepticism about the levels of affordable housing that would be achieved, given current performances by developers. Several were supportive of the proposed site on the grounds that it could provide affordable homes for those who cannot afford the area. Levels of affordable housing equivalent to current local policy requirements (50%) were demanded. In terms of housing need many were sceptical of the population projections, especially in light of Brexit where many believed foreigners would go home as a result of Brexit and immigration would reduce. This therefore meant that projected housing need was incorrect and that affordable housing would be better placed near to town and city centres or near effective public transport routes and not in Heald Green.

There was a lot of concern regarding appropriate infrastructure provision given the overloading of several aspects of infrastructure ranging from roads to drains to schools to doctors to current insufficient public transport provision.

There were queries about the inclusion of an Equalities Impact Assessment and a Health Impact Assessment as part of the Integrated Assessment.

Road congestion dominated the concerns with many residents unable to travel efficiently in their cars as a result of busy roads. This includes commuters (particularly on the A34), parents and grand-parents on the school run and people wanting to drive to Heald Green Rail Station.

Public Transport provision was not deemed useful since the train station lacks sufficient parking and at 1 mile is too far to walk to (some residents are indeed elderly or have a long term condition that does not allow them to walk that sort of distance). Trains only serve Manchester and not Stockport. Buses are not frequent enough and people have observed from their cars that buses are often held up by traffic. Many would like the Metrolink to be brought to the area but several appreciate that this might only be funded by major development in the area.

It is believed that the A6MARR Relief Road will be filled with traffic if the proposed site goes ahead offsetting any benefit. Many think that the road will not deliver the relief it promised anyway given current traffic congestion, the development at Woodford and CEC's proposed Handforth site.

OA24 Sidebottom Fold

Who Responded

There were 1555 submissions to this section. These were from 1408 individuals, 81 couples or other family groups, five unknown people (name not supplied/illegible), two politicians (Councillor Clive Patrick, Stalybridge South Ward and Councillor Doreen Dickinson).

One submission was received from a landowner; Trustees of Mrs E Bissills (Marriage Settlement, Reversionary Share).

Three submissions were received from other organisations:

- Friends of the Earth
- Historic England
- Longdendale Community Group

Summary of Issue(s) Raised

This summary includes the points made in the template response letter that was submitted by 1,000 respondents.

Green Belt

The majority of respondents objected to the loss of the Green Belt based on a wide range of reasons: it prevents urban sprawl and the joining of settlements, loss of recreation area for local residents, loss of public rights of way, loss of quality of life, loss of wildlife habitat, loss of an area that acts as a 'green lung', loss of an area that absorbs rainfall and the likelihood of an increased risk of flooding.

A large number of respondents highlighted the LUC GM Green Belt Assessment for the parcels covering the proposed site and the conclusion that the site scored strong against 4 of the 5 purposes, therefore suggesting regard must be had to this evidence and the site must therefore retain its Green Belt status.

Many respondents pointed out that the proposal did not meet current national or local Green Belt policy because it failed to: safeguard the countryside from encroachment; prevent urban sprawl; and preserve the setting and special character of a historic town. Therefore the general consensus was that there were no exceptional circumstances for the release of the site from Green Belt presented in policy OA24.

One respondent observed that developing Sidebottom Fold would mean unrestricted sprawl of large built up areas merging Stalybridge, Copley and Millbrook - three distinctly different areas two with Conservation Area status.

Several respondents argued that the Green Belt provided the strong protection required to stop urban sprawl and the further erosion of town and city character. Furthermore, the policy has been successful in promoting urban regeneration on previously developed land.

A number of respondents felt that the release of Green Belt was unwarranted, ill-considered and ill-conceived and set a dangerous precedent potentially leading to future loss of Green Belt buffers and the merging of conurbations and suburbs.

One respondent stated that preventing sprawl, one of the key purposes of Green Belt policy, produced financial benefits to society by reducing the infrastructure and environmental costs associated with new development. In addition it provides the benefit of access to the open countryside to people on low incomes that live in the towns surrounded by Green Belt.

An additional point, made by many respondents was that the Green Belt close to Stalybridge is important to people and families for enjoyment and pleasure in the area that cannot afford holidays as do local schools for educational nature walks.

Some respondents pointed out that the existing urban area defined the defensible Green Belt boundary and that any change could simply be superseded by further proposals to amend. Furthermore, one respondent stated that the phrase was used in order to attempt to make the policy sound more acceptable.

One respondent commented that the detailed appendices of the LUC GM Green Belt Assessment were not available and therefore it was difficult for the public to make more informed comment.

One respondent concluded that based on analysis of the housing requirement, that Tameside was being subjected to central government and local council inflated proposal and these were being used to unfairly necessitate the use of Green Belt land.

One respondent stated that the ‘Saunders Green’ area would no longer be a hamlet if the development took place and that the proposal conflicted with the purpose of having Green Belt.

Site Selection

The majority of respondents supported a brownfield first approach to development with a focus on town centres regeneration/redevelopment sites and key locations accessible by public transport infrastructure. In addition a number of respondents suggested that the provision of basic housing should be used to support town centres regeneration.

A number of respondents felt that Stalybridge should not be the focus for new development because of its secondary status as a town centre and that Ashton-under-Lyne as a main town centre was better placed for new development in order to exploit the existing good infrastructure, such as motorway access, rail and Metrolink.

One respondent quoted CPRE evidence from 2016 that identified 124 brownfield sites in Tameside suitable for accommodating over 2,000 new residential units.

However, one respondent thought that the GMSF took it for granted that brownfield sites will deliver the major part of GM housing but that there is nothing in the proposal to make this reality.

One respondent suggested that CPO powers should be used to promote brownfield opportunities.

Many respondents asked why building should take place on sites not owned by TMBC and highlighted that there were still many TMBC sites that could be sold.

Many respondents suggested that this Green Belt site was preferred for development because it would be easier to develop than the brownfield sites that were available and that the GM priority on brownfield sites was being ignored.

One respondent suggested that an approach that fully exploited available brownfield sites, therefore reducing the need to develop at Sidebottom Fold, was more likely to gain the goodwill and trust of current residents.

One respondent suggested that in order to maximise the potential yields on brownfield sites that building should be on the smallest footprint, building up and for social housing with no building on Green Belt or other green spaces.

Stalybridge North and Dukinfield/Stalybridge Cllrs objected to the proposal on the basis that the site specific proposals in the GMSF focus upon Green Belt development and this will negatively impact upon the regeneration of Stalybridge and other former industrial towns.

Stalybridge North and Dukinfield/Stalybridge Cllrs objected to the specific proposal at Sidebottom Fold because of the detrimental impact upon the whole town not just the Stalybridge South Ward in which the site is located. As such, we wish to challenge this approach and suggested an alternative model for development.

Stalybridge North and Dukinfield/Stalybridge Cllrs objected to the allocation of so much existing Green Belt for housing over the plan period because this would mean significant competition with existing urban brownfield sites that are vital to town centre regeneration in Tameside.

Stalybridge North and Dukinfield/Stalybridge Cllrs commented that existing site yields in the current SHLAA underestimate the potential of sites within Stalybridge town centre. This increased capacity would make economic investment and housing deliverable. In addition it was noted that the existing SHLAA underestimates the number of sites that could come from ‘windfall’. This was based on the availability of vacant shops and other redundant buildings in and around the town centre. Furthermore, they contended that if this approach was extrapolated across Tameside and GM then there would be a significant reduction in the need to release Green Belt.

The majority of respondents believed that there was sufficient brownfield land/vacant buildings available to achieve the growth required and a further high number suggested that the housing requirement should only be reassessed when this source of land had run out. A range of brownfield sites were suggested as suitable for housing development:

- Stalybridge West/wider area around the railway station;
- The former police station, Stalybridge;
- The former clinic site, Stalybridge;
- Land along Grove Road, including Oakwood Mill;
- Old mills in general;
- Vacant land near Bailey Street;
- River Meadow mills;
- Site housing the old Palace cinema;
- Land around the Methodist church;
- The former Pineapple pub;
- Former Hartshead power station/Micklehurst railway sidings/Stamford golf course;
- Former Mossley Hollins and other former school sites;
- Former Ashton Brothers (Christie Towels), Hyde;
- Cleared housing sites in Hattersley;
- Former Robertsons Jam site, Audenshaw; and
- Former Oldham Batteries site, Denton.

A recurring proposal for an alternative site, suggested by many, was the former Hartshead Power Station site combined with that of Stamford golf course. The suggestion was that the gold course could be relocated and the site would benefit from direct access on an 'A' road (Wakefield Road) and the development would less detrimental to existing residents.

However, not all respondents supported this idea with one in particular stating that development of these sites would have an impact on the backdrop of the whole Tame Valley and would result in the loss of a very attractive area. Many respondents did not want to see building on any green spaces across Tameside and specifically in the Stalybridge/Millbrook area.

Cllr Dickinson commented that they weren't opposed to Green Belt development if it was desperately needed but that this should only happen once more suitable sites were built on, such as the privately owned derelict Oakwood Mill site in Millbrook.

Cllr Dickinson also suggested that sites such as Sidebottom Fold could be allocated with the potential to come out of the Green Belt in the next 20 years rather than removing the status now and leaving it available for developers in the immediate future.

One respondent suggested that there should be more focus on the urban area such as land from the 'Call for Sites' and the exercise should continue until all land required is identified within the urban area.

In addition to empty properties one respondent proposed that empty industrial units in Tameside could be utilised to ease housing and industrial requirements and that there was no evidence to demonstrate that this had even been explored as a quicker more accessible option.

Some respondents suggested that the lack of supporting information was a significant oversight and that there should have been a masterplan to accompany the proposal.

Many respondents suggested that a more appropriate strategy would have been to distribute development around the borough on smaller, generally brownfield sites, and suggested that this approach would have a number of benefits including distributing traffic more evenly and being more acceptable to existing residents.

One respondent felt that the northern end of the Sidebottom Fold site represented a sustainable option, being closer to Huddersfield Road, but that the remainder of the site would be overly reliant on the private car rather than public transport.

Many respondents felt that the site selection process was developer driven and lacked community involvement. This was compounded by a feeling that the plan to develop of green field sites was effectively a subsidy to developers with the resultant loss of land for farming and leisure pursuits.

Many respondents expressed an understanding of the need for additional housing at a national level but objected to the site because Stalybridge no longer had the capacity for housing development of the size proposed.

A number of respondents commented on the proposal to create most of the employment in Central Manchester and Salford and that this would result in a high environmental impact from people travelling excessive distance to access these jobs.

One respondent concluded that a holistic approach to development, bringing together the philosophies of urbanism, public transport-oriented development and protection of the countryside, heritage and biodiversity, would be beneficial because it regenerates existing urban areas, making the best use of suitable previously developed land and existing infrastructure and settlement patterns; it avoids the expensive new infrastructure necessitated by sprawl and it promotes resilient communities by encouraging nature conservation and good public services.

Cordingleys supported the allocation and provided an overview of the sites suitability and the potential for the inclusion of additional land that is within the control of the landowner. This would increase the potential yield of the site from 650 to 750 dwellings.

Cordingleys supported the allocation and set out by way of a SWOT analysis to explain the rationale for the release of the site from Green Belt. This included highlighting: single ownership; the sustainable and accessible location; the opportunity to support inward investment; providing significant support for the regeneration of Stalybridge town centre; the opportunity to integrate and protect GI and incorporation of SUDS; no legal issues with site

access; the opportunity for biodiversity gains; and that the infill nature of the site limits the conflict with removing the land from Green Belt status.

[Infrastructure](#)

The majority of respondents were concerned about the impact of the proposed development on existing transport infrastructure such as roads and public transport provision. Furthermore, they were also unclear on the measures that would be introduced to reduce congestion and improve public transport.

Congestion in the town centre of Stalybridge was a particular concern of respondents, with specific issues highlighted at High Street, Stamford Road, Mottram Road, Huddersfield Road, Acres Lane, Demesne Drive, Walkerwood Road, and Stocks Lane. Furthermore congestion at the M67 eastern roundabout and through Mottram, on the A57 and across the Pennines, was highlighted as a very significant existing issue. In addition many respondents identified congestion and rat running using the residential streets of Mottram Old Road, Acres Lane and Demesne Drive.

Many respondents pointed out that traffic congestion had become worse in the area due to the numerous recent housing developments and that infrastructure improvements to alleviate the existing problems were needed before any additional development could happen. This was supported by the frequent observations of: longer journey times; congestion on the A6018 and A635; proposed access points would be dangerous, whether child safety had been considered; that road levels on the site would be too steep; and it is too steep for cyclists.

Many respondents, including Stalybridge North and Dukinfield/Stalybridge Cllrs, suggested that any retail development or service provision as part proposed scheme was likely to increase traffic issues and compete with the town centre.

A number of respondents proposed that a traffic impact survey was essential.

One respondent observed that if Huddersfield Road is blocked then access for many residential areas along its course is very difficult.

Cllr Dickinson, along with many other respondents, suggested that most of the local employment has gone from the area and that people would have to commute to work, therefore leading to increased levels of traffic and congestion.

One respondent suggested that the infrastructure capacity issues in Stalybridge had been caused by the lack of developer contributions from the many smaller developments in the area. There was a need for wholescale infrastructure planning alongside the proposed development and at this time it was completely lacking, thus making the plans totally impractical.

One respondent suggested further clarity is required in terms of how ‘sustainable and public transport connectivity’ to Stalybridge town centre would be achieved, particularly as the town centre is high constrained in terms of land available for transport enhancement.

Many respondents felt the proposals for encouraging people to use public transport are not realistic and most people will use the car rather than the bus.

Many respondents, including Cllr Dickinson, commented that there is no space for improved road infrastructure and highlighted the congestion at various points on the network as examples of current problems.

One respondent asked what the proposed phasing of road projects was in the area alongside residential construction proposals for Godley Green and Sidebottom Fold.

Many respondents highlighted the fact that in winter conditions Mottram Old Road is either dangerous or impassable.

A number of respondents stated that no development could or should take place until the Mottram/Tintwistle bypass was complete. Furthermore a number of respondents identified the previous failure to deliver the bypass indicated that there was a distinct lack of joined up thinking by local authorities and failure on the part of central government.

One respondent went further and suggested that significant road infrastructure improvements are required to facilitate movement into Manchester, M60 and the airport, including a more direct bypass via Matley Lane to connect Mottram Rd direct to the M60/62.

Jonathan Reynold MP, stated that he currently did not believe that the local infrastructure could cope with the additional development. He further stated that he could only support the proposal if the development funded major redevelopment of the road junctions leading to and from the area. This should also include Tameside MBC undertaking a major study of the Stamford St corridor traffic bottle neck where it was suggested that substantial improvements must be possible.

A high number of respondents highlighted that the proposed access points to the new development appeared to be onto Mottram Old Road. They concluded that this will introduce greater traffic onto a road which already has traffic calming measures and that this would contradict the purpose of the traffic calming by introducing more traffic. In addition a number of respondents highlighted existing traffic issues caused by parking on Stocks Lane.

Many respondents highlighted that Walkerwood Drive should not be used as the main access to the site – too narrow, cannot be widened and children play on it. Loss of play opportunities for children would be negative.

Many respondents stated that access to site would be problematic due to congestion in Copley and only having a small access point on Mottram Old Road

A number of respondents commented that a few changes to ‘key junctions’ will not enable the area to manage such a large increase in traffic volume.

The majority of respondents highlighted that Stalybridge Station already suffered from an unreliable and overcrowded rail service, specifically during peak times. In addition it was pointed out by the majority of respondents that traffic congestion made it difficult to access the station, that there was a lack of parking for commuters and that walking or cycling from the proposed site was unrealistic given the distance and topography.

Therefore many respondents identified the existing and future need, should the development proceed, to upgrade the rail service and car parking capacity at the railway station. However, many respondents also commented that this proposal would not help congestion in the town centre as most people would still access the railway station by car.

One respondent suggested that significant increases in parking at Stalybridge, Godley, Hyde and Ashton stations along with a coordinated approach with rail service operators to increase the number of trains along were required.

A number of respondents considered that the extension of Metrolink to Stalybridge would be of benefit, although a number also stated that although the arrival of Metrolink in Ashton was a good thing it was compromised by lack of car parking and poor bus connections.

Jonathan Reynolds MP also stated that he wished TfGM could confirm in principle their commitment to extend Metrolink from Ashton to Stalybridge.

One respondent observed the proposal to encourage people to cycle but that due to current congestion it is not safe for this. In addition they added that there is not enough existing cycle infrastructure and therefore the development of a full cycle network would be welcomed.

However, a further point was made that cycling would not work on the site and that there is no credible way of linking the site to the station for cycling.

One respondent suggested that all neighbourhoods were ‘walkable’ and the proposal would actually deter people from accessing the countryside via the existing public footpaths. This was supplemented by comments from one respondent’s suggestion that the loss of the site would significantly impact on the local population’s ability to access the countryside. This was based on the fact that the countryside is gently undulating with easily negotiable paths unlike the higher moorlands which are considered more suitable for serious walkers.

The Canal and River Trust commented that whilst the proposed site was not immediately adjacent to the Huddersfield Narrow Canal it is considered that the proposed development of this site should consider wider opportunities for access to the canal for use as a sustainable transport route and for recreation and leisure use.

The majority of respondents raised the impact on health care provision and education places as a major concern. The difficulty in obtaining a medical or dental appointment, capacity at

Tameside Hospital, lack of school places, lack of local sixth form education locally were all highlighted as existing issues to support this argument.

One respondent commented that schools were at capacity and from their experience planning and funding of new facilities was haphazard and subject to sparse funding.

Many respondents supplemented the above issue by stating that they did not think the policy was clear on how provision for increased school or health care capacity would be provided.

One respondent proposed that a new GP surgery would be essential because of existing local capacity issues for new patients coupled with the fact that the walk-in-centre at Ashton now required an appointment.

A number of respondents suggested that even if additional health and education facilities were built that there could be problems in actually recruiting staff due to known current shortages.

A number of respondents asked who would fund provision of on-site parks, sports provision and play equipment.

One respondent also commented that all local clubs for children, such as Brownies, Cubs, Guides, swimming, dance etc. are full.

Several respondents questioned whether the Buckton Castle Water Treatment Works could cope with the additional pressure posed by the development. In addition one respondent pointed out that low water pressure was already an issue in the area.

United Utilities made several observations:

- A number of large pressurised water mains cut through the site.
- There are existing UU easements which need to be considered.

[Flooding and Water](#)

The vast majority of respondents referred to recent (November 2016) and historic flood events in Stalybridge that were contributed to by surface water run-off from the proposed site and that this particularly affected Demesne Drive. Many people linked the potential loss of this green area to a likely significant potential for increased flooding in the lower lying areas of Stalybridge.

A number of respondents highlighted that FOI information indicated two incidents of flooding in the area below the proposed Sidebottom Fold allocation. In addition some respondents highlighted the likely increase in the number of flood events caused by climate change.

One respondent gave a detailed history of flood events in and around Stalybridge and suggested that no risk assessment had been carried out for the River Tame and Huddersfield Narrow Canal between Mossley and Stalybridge. The proposed development would exacerbate any flood risk and the 2011 SFRA does not take into account the catchment above Tameside and four reservoirs above Greenfield. Furthermore, the respondent suggested that the area should not be in flood zones 1 or 2 but zone 3 and that this would affect where future building can take place.

One respondent stated that the proposal was a flood creation scheme and suggested that it ignored Environment Agency (EA) guidance. The respondent suggested that the frequency and intensity of rainfall events was having a significant impact on the likelihood and occurrence of flood events close to the Pennine hills. The building of houses on the proposed area would compound what has been experienced in previous flood events.

One respondent observed that the recent development at Moorland View has already altered the runoff characteristics of the area with more surface runoff flowing down Harridge Ave, Poplars Rd and Brushes Rd and this contributed to the Nov 2016 flooding of Besom Lane/Grove Road

Many respondents identified that the EA categorise part of the site as at high risk from surface water flooding.

Many respondents did not support, or necessarily understand, how the policy requirement for sustainable urban drainage (SUDS) would help mitigate flood risk when a large part of the site would be built on, therefore, increasing the amount of surface water run-off.

Some respondents questioned why implementing SUDS was less likely to cause surface water run-off than the existing fields.

One respondent suggested further clarity is required about what type of SUDS is intended, i.e. green roofs that are unpopular with developers and most buyers do not like them and therefore this is an unrealistic policy aspiration.

Given the propensity for flooding one respondent asked what the plan was for the natural streams that run within Sidebottom Fold in the proposed development.

Several respondents objected to the conclusion in the Flood Risk and Water Management Evidence Paper which stated that there are no flood risk considerations for this site.

Furthermore a number of respondents noted that evidence paper is based on modelled data and that is therefore indicative rather than specific. Therefore the respondent stated that there was a clear need for specific detailed research based on actual events. Also one respondent correlated this with various GMSF policy statements (GM10 (1), GM18 and GM25 (6)) regarding the mitigation of flood risk and prevention of surface runoff and that if the site was developed it would not comply with these policy requirements.

Calculations and evidence included by one respondent proposed that the site is vital in preventing higher levels of flood risk on the lower lying areas of Stalybridge. Furthermore several respondents highlighted that the NPPF at paragraph 103 states that planning authorities should ensure flood risk is not increased elsewhere.

One respondent proposed that to mitigate against flood risk sufficient resilient infrastructure should be built and maintained by the council and that a percentage of the additional council tax raised from the development should be ring fenced for maintenance of these systems.

Several respondents objected to the potential for additional polluted water discharge into the River Tame as this is classified as eutrophic.

One respondent stated that houses built in the last ten years on Mottram Old Road have suffered from flood damage.

One respondent highlighted the work of Dr Paul O'Hare, a lecturer in urban geography and development at Manchester Metropolitan University, in that we are now suffering the consequences of years of not paying enough attention to flood risk management.

United Utilities noted that consideration must be given to the disposal of surface water in the most sustainable way.

[Health](#)

Many respondents objected to the loss of the site because they claimed it was very important to retain such areas for health, well-being and recreation.

One respondent pointed out that Tameside has some of the highest levels of heart disease, vascular dementia and other long term health conditions nationally and that the aims of the Public Health 'Care Together' programme, to increase the life expectancy of Tameside residents would not be achieved with the further strain on the local health facilities. The local GPs and the hospital that has only just recently come out of special measures will not cope.

The above point was also linked by many respondents to the evidence that links green spaces to health and well-being. A number of respondents commented that the health statistics for Tameside (relating to poor levels of health and obesity) are a specific problem and linked this to the fact that if green space is removed then there are less opportunities for promoting wellbeing in physical and mental health.

One respondent noted that the proposal scored negatively in the Integrated Assessment (IA) for the impact on resident's health.

[Pollution and Air Quality](#)

Many respondents objected because traffic generated by the proposed site would cause additional air quality problems due to increased vehicle emissions.

A number of respondents pointed out there was an existing issue of poor air quality, with some areas identified as AQMAs, and there would be a potential negative impact caused by additional traffic from the development. This conflicts with the NPPF and the extensive evidence on air quality related illness from PHE.

The increase in traffic conflicts with the GMCA Air Quality Action Plan. Based on PHE evidence there will be a further impact from traffic congestion on air quality will compound this health issue.

One respondent cited PHE evidence that poor air quality contributes to 127 deaths in Tameside.

Furthermore, one respondent observed that the cumulative impact of GMSF development across the conurbation will be a further worsening of air quality.

One respondent suggested that the proposal would weaken the natural mechanism that mitigates damage caused by carbon emissions from increased levels of traffic whilst another suggested that the land had a vital role to play in carbon storage.

Additionally a number of residents pointed out that the site would generate excessive levels of noise both during and after the construction phase. One respondent expanded on this theme stating that in the construction phase the number of heavy vehicles that will use the neighbouring residential streets will cause health problems in addition to the potential for structural damage to existing properties was not acceptable.

One respondent made the specific point in relation to topography and air pollution created by traffic – that the valley keeps the pollution more contained and that this is worse for the local population and area.

Some respondents asked how increased light, sound, waste and traffic pollution to the surrounding residential areas would be considered.

One respondent noted that the HSE listed COMAH site in Stalybridge that is 1,500 metres from the site.

[Green Infrastructure, Biodiversity and Landscape](#)

Many respondents objected to the impact of the proposed development on an area they considered to be of outstanding natural beauty.

Many respondents questioned why would developing the area present an opportunity to increase Green Infrastructure capacity, as stated in the policy, this was generally supported by the observation that the proposal was to build on green field land and therefore in all likelihood the Green Infrastructure would be worse after the development.

Furthermore, several respondents suggested that the document be revised to show how this enhancement to create Green Infrastructure gains would be achieved or make it clear that it will be worse.

The majority of respondents objected to the proposal because it would result in the loss of habitat and wildlife, including mature oaks and hawthorn and wide variety of fauna, including: deer, bats, owls, birds of prey, badgers, foxes, rabbits, shrews, and hares.

One respondent pointed out the existence of veteran trees which contribute to the character of the area which should be protected. They further emphasised that mature oaks already in situ provide natural water control as each tree takes a minimum of 50 gallons of water a day.

Many respondents commented that the policy does not set out how habitat and wildlife would be protected or preserved.

Many respondents commented that the proposed new housing estate would have a detrimental impact on the character of the area.

A number of respondents stated that the proposal would lead to the unacceptable urbanisation of a rural site which would create an urban mass that is next to the Peak District National Park and the Pennine Way. In addition a number of respondents felt that by developing this site the area would no longer be the foothill of the Pennines. One respondent made an additional point that it is the distinctive boundaries to the North and East of Stalybridge that give it identity.

One respondent stated that the elevation of the planned site means any construction will be visible for miles around and will change the landscape forever. Whilst another respondent stated that the proposed development would be over-bearing, out of scale and out of character with existing houses and another that it would be impossible to achieve development sympathetic to the landscape because of the prominent position in the foothills of the Pennines.

Many respondents suggested that the site was an important buffer between the urban area and the moorlands.

One respondent stated that views of the site are important in most of the villages in this area of Tameside, and they define and protect the setting of the industrial Victorian villages.

City of Trees, in commenting on the relevant tree and green infrastructure aspects of the policy, welcomed the proposed green infrastructure requirements but recommended that under point eight that 'high quality' needed inserting before the word green.

Heritage

One respondent stated that the hillside above Stalybridge is a historic gem with medieval track ways, 16/17th century farms and field patterns with estates with ditched boundaries.

Only part of the cross valley track passing the 16th century Staley Hall still remains. Therefore an archaeological survey would be needed.

Historic England noted that the site was adjacent to a Grade II listed heritage asset and pointed out that the NPPF considers that any substantial harm to the significance or loss of a Grade II asset (including setting) should be exceptional.

Historic England also noted that no assessment of effects upon the historic environment of the proposal had been prepared as set out the NPPF. Therefore the proposal could not demonstrate that the principle and quantum of development could be achieved without harm to the historic environment. Therefore Historic England concluded that the allocation was potentially unsustainable and therefore unsound.

Housing

Many respondents specifically objected to the inclusion of executive homes on the site and suggested that the appropriate housing required in the area was one and two bedroom, i.e. smaller, cheaper, social housing – driven by the bedroom tax, single persons living alone, couples downsizing and young couples starting out.

Furthermore a number of respondents stated that the proposed housing types were misconceived as the housing crisis is caused by a lack of affordable housing to rent or buy.

In relation to this point one respondent suggested that many smaller units could be built on the site rather than the proposed executive housing type and that this would better suit the local demographic and that this type of resident is more likely to shop locally rather than the typical resident of the proposed executive homes.

Many respondents suggested that there was little evidence to support the proposal for higher value executive homes and many respondents also stated that there are a large number of unsold aspirational homes in Tameside, thus giving a clear indication that this type of housing is not required.

A large number of respondents suggested that the use of brownfield sites must be a priority and that the centre of Stalybridge provided many opportunities that would encourage people back into the town centre and to utilise the available public transport. Furthermore this approach could offer more affordable housing and respond to the forecast need for single and older persons housing.

One respondent accepted the need for additional housing but suggested that it must encompass a more diverse offer including affordable, bungalows, sheltered accommodation, aspirational and dementia friendly.

One respondent suggested that clarity was required on why the housing mix needs to be diversified.

One respondent agreed that higher quality family housing is required, particularly in Ashton-under-Lyne and they observed that there are far too many single bed properties and HMOs in Tameside and that working families and community cohesion need to be put first.

Many respondents understood the great necessity to build additional homes for the growing population but that the location and types of property were vital to ensure future community cohesion.

Jonathan Reynolds MP stated that he would only support the allocation if it included a substantial number of affordable homes.

[Housing Numbers](#)

Many respondents felt that the housing requirement across GM had been grossly overestimated and was in need of re-examination. Furthermore, a number of respondents felt the proposed 680 dwellings per annum target was too high. Many pointed out that Tameside had at no point built more than 500 dwellings per annum; therefore it seemed unlikely that the site could be developed out within the GMSF plan period as stated.

Many respondents, including the Stalybridge Conservative Councillors, contended that if population growth and the impact of Brexit was taken into consideration, along with historic data on housing demand in the last 5-10 years in the Tameside area, then the current perceived requirement of houses by the GMSF is wrong and overstated. A number of alternative housing requirements were calculated by respondents and these gave much lower figures than the amount proposed for Tameside in the GMSF.

One respondent felt that there was conflicting information about how much the population will rise – the population of Tameside has only fluctuated by a few thousand over the past 40 years and there is no evidence to suggest that there will be a sharp rise that necessitates the number of houses proposed.

Stalybridge North and Dukinfield/Stalybridge Cllrs objected to the stated levels of growth underpinning the GMSF as these are based on an inflated set of assumptions (HS2, Northern Powerhouse etc.) as opposed to the impacts on the economy of leaving the EU. Therefore, the extrapolations of growth are largely speculative and it is not logical to conclude that the level of growth will naturally exceed that of the UK or baseline predictions for GM. Therefore it would be safer to rely on lower historic trends in house building. Furthermore, they stated that the predicted build rates in the draft GMSF are up to 50% above those of recent years in Tameside and therefore are not realistic.

Many respondents suggested that there should be a pause until accurate population forecasts were available that reflected the impact of the Brexit vote.

A number of respondents stated that it is likely that the type of housing proposed would be above the average earnings of most Tameside residents, it would not help them onto the

property ladder and would mean an influx of dormitory residents who will not work in the borough and be of little benefit to the existing community.

One respondent stated that the timing/phasing of when and where the additional homes are required should also be clearly articulated to support the housing requirement which is being addressed.

Some respondents felt that the amount of housing proposed for Tameside is out of proportion to the rest of GM and therefore the development is not needed.

[**Integrated Assessment**](#)

One respondent specifically challenged the assessments in the Integrated Assessment for Sidebottom Fold suggesting that some of the positive IA scoring is questionable and based on subjective reasoning as follows:

- IA states affordable dwellings but draft GMSF details mainly executive housing;
- The need to add higher value C Tax banded properties does not meet the local housing need;
- Scoring the site positively for having a small local centre seems to exaggerate its importance;
- Scoring the site positively for transport infrastructure appears disingenuous given the existing traffic congestion in the area, specifically in relation to accessing the railway station;
- Scoring positively for health outcomes and reducing health inequalities is unlikely given the loss of green space and likely increase in road traffic locally;
- No detail is included on how education facilities will be provided. Also given the car orientated nature of the proposal then if the school situation is unresolved then there would be even higher car use;
- Objects to positive scoring on Green Infrastructure outcomes based on the fact that the site would result in net loss of Green Infrastructure;
- Site is correctly not identified in a flood zone but it does function as part of the local catchment and there are surface water flooding issues to the north of the site; and
- Suggests that removing land from the Green Belt, whilst although retaining trees and hedgerows does not warrant a + score.

Based on the proposed housing growth the population would increase by 35,000 over the plan period but there are almost no proposed increased employment opportunities locally.

Even the brownfield land supply to a large extent relies on former employment sites therefore indicating that people will have to travel further for work. Even with increased PT capacity the overall effect will be increased road traffic.

In conclusion the OA24 IA outcome is scored excessively highly to give an unrealistic view of the impact of the site.

Other Comments

Many respondents, including the Stalybridge North and Dukinfield/Stalybridge Cllrs, highlighted the conflict between the proposal and the policies and statements within the GMSF. For example that “all residents will benefit” and that no development would take place within the identified site because of conflicts with Policies GM7, 9,10,11,12, 13 and 14.

Most respondents agreed that the regeneration of Stalybridge town centre was vital, but most did not agree, or questioned the validity that the proposed site would contribute towards this aim. Many respondents suggested that Stalybridge town centre needed more investment to support regeneration. Furthermore, the Stalybridge North and Dukinfield/Stalybridge Cllrs suggested that the new development will not support town centre regeneration because the experience for Stalybridge has been that new households with higher incomes tend not to spend money in towns that have few facilities, shops and services. However, they went on to suggest that residential investment in the right town centre locations can provide inward investment and create local demand for goods and services.

One respondent emphasised that the brownfield sites in Stalybridge town centre would be more appropriate and supply housing that would be ideal for younger professionals commuting into the city as there would be less need for a car and the land is flat. In addition this would bring life to the town centre.

One respondent was specifically disappointed by the lack of reference within the GMSF on the regeneration of smaller towns. They were concerned that the GMSF appeared to be a plan for a few main town centres and not for the likes of Stalybridge and Hyde. The respondent suggested that these towns have specific issues that require a number of policy interventions and public sector funding to stimulate investment.

One respondent suggested that the proposal to support the town centre regeneration of Stalybridge through this form of gentrification was without evidence. However, many respondent felt that the influx of families would provide an economic stimulus to the town centre. However, they also generally indicated that there were many serious constraints that needed addressing before any proposal could be considered.

A small number of respondents suggested demolishing the centre of Stalybridge and redeveloping it for housing and developing the riverside, canal and town with a mixture of new housing and business opportunities.

Many respondents commented that Stalybridge should have more of culture and feel like that of Uppermill if the council focused its attention and priorities.

One respondent observed that Stalybridge is at risk of becoming a ‘doughnut’ with an underfunded, underused town centre.

A number of respondents highlighted that there was little, if no, consideration given to the need to increase local employment opportunities and that this should be linked to the need to invest in the town centre.

One respondent observed that the proposal suggests that local manufacturing would benefit from the increase in the labour force thereby reducing the traffic in the Manchester direction, but commented that there is little or no help from Local Government for manufacturing expansion. They gave an example of a local engineering company that now sublets orders to other parts of the Country since it finding it almost impossible to expand in this area.

One respondent suggested that the GMSF was too housing focused and did not take into account the creation of local employment opportunities.

A number of respondents also supported the aim of increasing the value of the area, driving growth and new businesses but they generally also felt that the plan needed to consider services more widely.

One respondent suggested that there should be emphasis and incentives which drives shops to remain open later in the evenings and early mornings that people who actually work till 6-7pm.

Many respondents were concerned that rock blasting maybe required in order to achieve correct gradients and floor levels on the site and therefore vibration to foundations of existing properties is a major concern.

Many respondents stated that there appeared to have been very little consideration for the existing population and specifically those who lived in close proximity to the site who would be directly impacted on by the proposal.

Many respondents asked whether they would be compensated for any loss of value of their property incurred due to the proposed development taking place.

One respondent pointed out that there had been no formal contact with any recognised authority regarding mines in the area or the environment.

One respondent pointed out that development of this site would meant the loss of farmland which is used by a local farmer to breed cattle. This proposal would also mean the loss of the farmer's family home.

[**Alternative Proposals**](#)

Stalybridge North and Dukinfield/Stalybridge Cllrs proposed a preferred option for a more sustainable housing solution for Stalybridge that involved increased development densities and the delivery of over 1500 residential units on brownfield sites in and around the town centre. This offers the opportunity to create a new community with supporting services and

an improved retail and leisure offer. Furthermore, this approach is supported by GMSF policies GM1, GM5, GM6, GM15, GM19 and GM20.

Stalybridge North and Dukinfield/Stalybridge Cllrs recommended that the OA24 proposal be removed from the GMSF on grounds that it is completely unsustainable and detrimental to the long term aspirations for the regeneration of Stalybridge. A further recommendation was to include an allocation that supports housing as part of the regeneration of Stalybridge.

A number of respondents commented that before any support for this proposed allocation can be given, a holistic plan is essential to demonstrate how any additional residential capacity can be safely and beneficially incorporated into the existing environment.

One respondent proposed that a cohesive development plan which is for the greater good of people of Greater Manchester was required.

One respondent suggested that a policy of restraint should continue with no changes to the Green Belt boundary.

Many respondents suggested the development of local infrastructure as well as jobs and employment should precede the development of any sites near Stalybridge in order to reduce the levels of commuting to Manchester or beyond.

OA25 South Tameside

Who Responded

There were 193 submissions to this section. These were from 163 individuals, eight couples or other family groups, no unknown people (name not supplied/illegible), Cllr Andrew Kinsey and ward Councillors for Hyde Werneth.

There were four submissions from developers/landowners:

- Barratt Homes Manchester
- Mr J Bagshaw & Miss C Bagshaw
- Taylor Wimpey Limited
- Wainhomes NW Ltd.

There were five submissions from other organisations:

- Dane Bank Green Space
- Environment Agency
- Friends of the Earth
- Historic England
- The Campaign to Protect Rural England, Friends of the Peak District & the NW Transport Roundtable (single submission).

Summary of Issue(s) Raised

Vision

A more holistic approach should be taken.

The building of new houses on precious green belt is not forward thinking.

It would take away the appeal of the area.

Excessive site size; construction on both sides of the A560 is too much.

This is part of the Tame River Valley, which remains important and treasured recreational land. Not only does the valley act as an important green buffer between Tameside and Stockport, which is now at [risk of?] being eroded, but the valley also provides residents with recreational and leisure amenities. Any such development would be visually intrusive into the valley, its users, its local community and wildlife, especially that which currently exists [at?] Reddish Vale Country Park.

The combination of this allocation and other nearby allocations would have 'negative synergy' with unacceptable cumulative impacts.

Opposition to loss of greenbelt land separating the towns of Woodley and Gee Cross, to prevent urban sprawl. It would also blur the borough boundary between Stockport and Tameside.

Increases average council rate band across the borough

Impact on the character of Gee Cross:

- Completely out of character to propose building on this scale for a small village area
- Gee Cross is a small village and cannot survive such an aggressive amount of houses being built within a small area.
- Gee Cross is not a town, it is a semi-rural village and as such does not have the infrastructure to support an additional 600 homes and its residents and this can't be put in place without changing the dynamic of the village to such an extent, it simply loses its historic identity.

230 homes at a density of 30 houses/hectare would be totally out of character with the semi-rural nature of Apethorne lane

It has taken years to make this land (Tame Valley) an area for Tameside residents to enjoy some green space and a lot of funding from the council as well.

"Is it not better to utilise one large site as this would have minimal impact on local residents but allow the provision of new services and infrastructure to be developed alongside any proposed new residential homes. Selecting many smaller sites without improving services and infrastructure is bad planning and will overload the current provisions."

"How can there be plans to build 4000 new homes around the Hyde area. ... This town is already vastly over populated."

"Support for the development of land on Apethorn Lane and Bowlacre Road, Gee Cross. There is a severe shortage of properties including social housing that would be included on a new home site. Furthermore the restoration of the grade 2 star Apethorn Farm being of local interest would be an asset to the area."

[Brownfield First & Urban Regeneration](#)

Use brownfield sites before green belt; there are numerous brownfield sites in Tameside that could be redeveloped.

Regeneration of town centres and industrial wastelands should be prioritised over loss of green spaces/fields.

Building should be focused on areas that are near to employment, transport and services; i.e. not here.

This location makes a good contribution to the purposes of green belt as set out in NPPF and should therefore be retained.

There are many empty properties in Gee Cross that could be developed instead.

[Green Belt](#)

Development of the land south west of Apethorn Lane (230 houses) and land east of the A560 at Bowlacre farm (380 houses) would add to urban sprawl as there would no longer be a clear boundary between Gee cross and Woodley.

In recent years large swathes of the Denton and Tameside green belt areas have been lost. The area is in danger of becoming a ‘concrete jungle’.

Development here would link up with Hattersley and Woodley.

This area is a beautiful area of greenbelt which is fast diminishing in all inner conurbations.

[Housing Type](#)

Opposition to higher value housing, and suspicion that the policy is motivated by developers' profits; affordable housing should be prioritised to help solve housing needs.

Particular opposition to the proposal for ‘executive’ homes (not specifically mentioned in the policy, although it does propose ‘a considerable proportion of higher value development’. But not everyone agrees; “. If homes are to be built in South Tameside an effort should be made to improve the levels of executive housing stock which the borough currently lacks.”

[Infrastructure](#)

Infrastructure is inadequate and not adequately included in the plans; including GPs, schools, roads. Some respondents argued greater provision should be proposed in the policy; others argued the quantity of development should be reduced.

New infrastructure should be in place before new homes are occupied, but there is scepticism that this would be the case.

Concerns over adequate provision or ability of existing provision to cope:

- Health services
 - GPs
 - “There are limited GP places in the area.”
 - Dentists
 - hospitals
- Schools
 - “The High School is already over-subscribed. The plan only proposes an additional primary school.”

- “School provision in the area is already at breaking point with not enough school places already.”
- Roads:
 - Nearby main roads severely congested and are bottlenecks. Concern about increased pollution and road traffic accidents.
 - M67
 - there is now a permanent queue of stationary traffic at the end of the M67 in Hattersley
 - A560
 - Include some alteration of the A560 to assist traffic flow towards Stockport
 - A560-A627 junction overloaded at peak times
 - M60
 - Local roads block up if there are any issues with the M60
 - Access to M60; “The traffic on the main road leading to the M60 in both directions is already almost at a standstill most mornings and evenings”.
 - Local roads
 - “Tameside has already heavily invested in infrastructure in the immediate vicinity; Lord Sheldon Way, Tram, traffic easing measures on Park Parade and Albion Way ... Modern commercial, retail and leisure facilities are already in place”
 - The access to the Hyde Hall Farm Proposed Site is not suitable and any increase in traffic will gridlock the local roads
 - Town Lane is narrow and difficult to get down when busy
 - ‘Stockport Road is heavily congested at peak times’
 - Risk of through traffic travelling through the residential area of Lord Derby road
 - many roads are constantly used as rat runs by motorists from other areas of Denton, wanting to bypass the Denton Rock roundabout, which constantly gets gridlocked
 - Congestion
 - “The area is already congested with traffic and parked cars.”
 - “Hattersley roundabout traffic is horrendous as is Denton roundabout and the route to Stockport.”
 - There is already a very high congestion on traffic at rush hour morning and night on the road leading to Ross Lave Lane. (Town Lane).
 - Mismatch between the higher value houses proposed and lack of highly paid jobs in the local area, meaning increased commuting to other areas for work
 - Don’t destroy the ‘Cown Edgeway’ public right of way
 - Road safety, particularly for children on busy narrow roads – including the two schools on/off Town Lane
 - Air pollution
 - Development here would be contrary to aims to reduce the need to travel and associated problems including traffic noise and air pollution.

- “Roads currently flood on a regular basis surrounding the areas where these developments are proposed. This is the result of the local authority abandoning the routine clearing of road surface drainage systems. If a local authority cannot cope with existing drainage issues what hope is there when they have additional responsibilities?”
- Access to this site for building - the local roads will be overloaded with the site traffic and earth moving equipment on small country lanes.
- Police
 - “There is not enough policing in the area for amount of crimes that are committed and there is a lack of police presence in the area now, we very much think having more houses is going to make crime in the area worse and we don't think they will employ more police to monitor the area.”
- Fire services
- Public transport

Green Space

Loss of recreational open space

- Land used by dog walkers, ramblers, horse riders, and mountain bikers, runners, and for ‘outdoor pursuits’.
- “Green spaces are in short supply in Hyde.”
- Loss of ‘scenery’

Loss of natural beauty

Loss of agricultural land

Greenbelt land should be kept for future generations to enjoy

Access to Werneth Low country park and beyond for walkers and cycling

Developing ‘land South West of Apethorn Lane, Gee Cross’ would harm views from the country park.

The Trans Pennine Trail walking, cycling and equestrian route adjacent is used by local people and visitors from elsewhere in the UK, Europe or worldwide. It forms part of the European footpath route from Ireland to Turkey.

Biodiversity

“Developing the Apethorn Lane and Bowlacre Farm areas would have a catastrophic effect on the ecosystem. This area is a wildlife corridor which would be decimated if 610 properties were built on this area. We regularly see/hear tawny owls, bats, badgers, sparrow hawks, buzzards, herons, together with general garden birds some of which are now on the RSPBs RED (endangered) list. In winter, flocks of fieldfares and redwings return to this area. In spring hundreds of frogs and toads move from the Pear Tree farmland to spawn in Pole Bank pond and the froglets and toadlets move back to the farmland. We have already seen the effects development can have on nature as years ago hundreds of lapwings used to nest in the Werneth Low area and with development in this area these birds are now not seen.”

The wildlife in the area must also be considered, we have bats, many bird species including owls, badgers, foxes, deer, otters all these need a home too.

Loss of habitats for wildlife

"The green belt pasture that adjoins the SBI at Pole Bank and is included within the allocation forms an intrinsic part of the ecosystem linking with the Tame Valley Nature Reserve and forms a continuous green wildlife corridor with Werneth Low Country Park. The result of overbuilding this site would have a massive negative effect on the local wildlife."

Great crested newts, bats, TPOs.

Land South West of Apethorn Lane, Gee Cross' hosts resident and overwintering birds

On Bowlacre Road, we have Owls, Woodpeckers and Bats

The green belt pasture that adjoins the SBI at Pole Bank and is include within the allocation forms an intrinsic part of the ecosystem linking with the Tame Valley Nature Reserve and forms a continuous green wildlife corridor with Werneth Low Country Park.

Wildlife includes:

- Mammals
 - Foxes
 - Bats
 - Squirrels
 - Badgers
 - Otters
 - Deer
- Birds
 - Tawny/other owls
 - Kestrels
 - Herons
 - Woodpeckers
 - Sparrow hawks
 - Buzzards
 - Garden birds
 - Fieldfares
 - Redwings
- Amphibians
 - Great crested newts
 - Frogs
 - Toads

Heritage

Unnecessary urbanisation destroying the semi-rural setting of the historic asset (the hall).

"A housing development of this scale (230 homes at a density of 30 houses/hectare) would be totally out of character with the semi-rural nature of the lane and would not conserve and enhance the historic environment and heritage assets".

Planning history: two previous applications being refused, (dismissed in 2000 and 2006) because the special circumstances, which would have enabled the development of the Hall, did not outweigh the recreational and environmental importance of the green belt land; this new proposal is far larger than the previous two refused applications. Indeed refusal was upheld by the planning inspector and the Secretary of State. The Secretary of State concluded on 30/06/2006: "The Secretary of State agrees with the Inspector (IR122) that the main issue in these appeals is whether the proposals would secure the future of the listed buildings and whether the benefit of this would outweigh any harm which the development would cause to the Green belt and any other harm. In reaching her decision the Secretary of State has therefore given particular consideration to the following. 1) Importance of the listed buildings and the need for enabling development; 2) Compatibility with national housing policy; 3) Whether the appeal proposal complies with Green Belt policy. The Inspector recommended that the appeals be dismissed and planning permission and listed building consent refused. [For the reasons given above] the Secretary of State agrees with the inspector's conclusions."

Flooding

"A development on this area would also increase the water flowing into the natural water courses as it is currently a naturally very wet area which could have implications to flood controls in other areas!"

The land presents many "issues" water outlets which along with excessive run off water would present a significant risk to lower lying properties in Hyde

Land provides drainage of the higher grounds above, which helps reduce flooding in the centre of town.

I am also concerned about the impact upon my house and garden of any housing built on the field directly behind my home. The field is higher than my house and that of many of my neighbours. My garden is staggered and has drainage built in to ensure my house is not flooded from water from the field. In building on the farm land, which acts as a natural absorption for the water, I am concerned that this would ultimately flow onto my property and cause excess flooding.

Constraints

"Flanked either side by brooks, and unspecified landfill"

"I am also concerned that any building directly behind my home would block any natural light as we are already below the field level so any house would be significantly higher than my home and my house would be in almost complete darkness. I feel that this is unacceptable."

Air Quality

The fields act as a buffer for the amount of pollution we get from the M60, the industrial estate at Bredbury, the industrial estates on Windmill Lane and the huge amount of traffic which comes through crown point in Denton to get to the M60 and Crown point shopping areas.

OA26 Mottram M67 North and South

Who Responded

There were 386 submissions to this section. These were from 342 individuals, 22 couples or other family groups, no unknown people (name not supplied/illegible), Councillor Gillian Peet,

High Peak Borough Council, no developers/landowners, and three submissions from other organisations: Friends of the Earth, Longdendale Community Group, and a joint submission from the Campaign to Protect Rural England, Friends of the Peak District & The NW Transport Roundtable.

Summary of Issue(s) Raised

Green Belt

The majority of respondents objected to the loss of Green Belt based on a wide range of reasons:

- Neither exceptional nor very special circumstances for the alteration of the Green Belt boundary and allocation of the site for development have been demonstrated for this inappropriate development;
- The proposal conflicts with the purposes of Green Belt set out in the NPPF;
- The use of Green Belt would permanently erode remaining green spaces;
- It is needed to keep the separate identities of Longdendale and Hyde; and
- That brownfield sites should be utilised before any Green Belt was released.

A number of respondents questioned how the proposed development would safeguard the countryside from encroachment and how it would preserve the character of rural areas.

Many respondents appeared to be under the impression that the policy was to trying to allow for Green Belt development in advance of the redevelopment of brownfield sites and that ‘no brownfield sites had been identified in the GMSF in relation to the Mottram and Godley Green plans’.

Many respondents felt that the plan represented part of the continual erosion of Green Belt by housing development and that ultimately Greater Manchester would be left with no green spaces.

Furthermore many residents felt that the Green Belt should be saved for future generations.

Many respondents were confused by the policy statement in GM13 because the strategic sites propose a loss of Green Belt whilst the policy text states that the Green Belt will be retained and afforded strong protection.

Site Selection

The majority of respondents supported a brownfield first approach to development with a focus specifically on revitalising accessible town centre locations, such as Ashton-under-Lyne, Hyde and Stalybridge.

Furthermore many respondents felt that the proposal ignored the GMSF policy of securing the reuse of brownfield land as it focused on developing on Green Belt. This point was reinforced by the Longdendale Community Group who felt that re-classifying Green Belt

land would lead to the cherry picking of green field sites at the expense of brownfield sites. It was suggested that safeguards should be built into the GMSF to prevent development of the Green Belt sites before brownfield alternatives had been redeveloped. To this end a review at 10 years was proposed to reassess the need to release Green Belt.

Many respondents specifically objected to the selection of the site to the north of the M67/A57 for industrial development as they felt this was totally inappropriate for the area. Many respondents, including the Longdendale Community Group, clearly stated that these land uses should be zoned separately especially where there was potential for dangerous industrial processes to be in operation.

Several respondents, including Longdendale Community Group, objected to the evidence used to support the potential industrial allocation and that this did not take into account the requirements of community engagement or of the duty-to-cooperate required by the Localism Act. As a result the proposal overlooked the availability of existing industrial sites in the neighbouring High Peak area.

Some respondents suggested that Tameside could identify sufficient land to cope with any unforeseen economic growth leading to a requirement for additional premises and jobs without using Green Belt land.

Furthermore many respondents referred to the apparent lack of consultation with neighbouring districts as required by the duty-to-cooperate.

Several respondents objected to the industrial allocation because of the potential to store or use hazardous materials such as flammable solvents and gas cylinders.

Furthermore, the respondent suggested that the selection of the site was not a sustainable option due to infrastructure costs and the embedded energy per square metre to develop. An additional observation was that the GMSF site prioritisation identified a significant surplus of potential floor space and therefore this less sustainable option should be removed from the supply to reduce the surplus.

Several respondents objected to the proposed industrial development because of the negative impact on visual amenity, wildlife and adjacent conservation area.

As an alternative to the proposal many respondents highlighted that there were numerous empty industrial units within the locality that would be prime for redevelopment rather than developing Green Belt.

One respondent pointed out that there was no evidence to suggest that previous transport impact studies have been taken into account including the Tameside Transport Impacts of the Tameside LDF by MVA Consultancy (Dec 2009).

One respondent felt that there should be a greater focus on trying to find innovative, sustainable, eco-friendly housing solutions to housing need rather than focusing on Green Belt release.

Some respondents stated that they were not averse to smaller organic growth within Mottram if it provided affordable housing that enabled people to continue living in their local area.

The majority of respondents believed that there was sufficient brownfield land/vacant buildings available to achieve the growth required and a further high number suggested that the housing requirement should only be reassessed when this source of land had run out. A range of brownfield sites were suggested as suitable for housing development (including for affordable):

- Numerous cleared sites in Hattersley, including the land adjacent Tesco;
- Ashton Brothers (Christie Towels), Hyde;
- Caroline Street, Stalybridge;
- Surplus Tameside Council owned sites;
- Empty industrial units in Mottram;

In addition to specific sites a number of respondents identified empty properties, old mills, empty public houses as new opportunities for providing dwellings and contributing to regeneration.

Indigo Planning proposed allocation of an alternative site at Matley Lane for 270 dwellings, including affordable. This site was deemed to be available, suitable and achievable.

Many respondents objected to the development of the southern site because it would lead to the further loss of recreation space and sports facilities and a number of respondents commented that this site had recently been upgraded and reopened

Several respondents reiterated previous consultation comments made by Sport England on the Tameside Core Strategy – this principally covered the loss of sports facilities on the southern site and that there was a failure to realise that replacement facilities would be required. It was also noted that the SA was silent in relation to the loss of sports facilities and that, additionally, para 74 of the NPPF protects such sites.

A number of respondents highlighted the 2016 Tameside Playing Pitch Strategy and it was observed that the pitches included in the southern M67 allocation had been omitted. It was further highlighted that this situation left Longdendale with no senior football pitches.

Infrastructure

The majority of respondents commented that the traffic congestion in the area was already a major issue both during and outside of commuting hours and that any additional development would contribute to a worsening of the situation. Reference was made to congestion in and around Mottram, Hollingworth, Tintwistle and Glossop and specifically on the A57, A625

and M67 (at both ends). Rat-running was highlighted as an issue on: John Kennedy Road; Ashworth Lane, Hyde Road; A560 Stockport Road; and Mottram Old Road through to Bredbury.

The majority of respondents were concerned about the lack of progress with the proposed Mottram Bypass over the decades. Many people, including Longdendale Community Group, were sceptical about the benefits of the current proposed bypass route options and whether this would deliver any real benefit or as many suggested that it would only move the congestion problem to a different location and potentially attract higher levels of HGV traffic and commuters.

Additionally, some respondents questioned whether the proposal would alleviate any of the local traffic access issues or whether the capacity created would simply be absorbed and overwhelmed by the traffic generated by new developments in Tameside and those proposed in Glossopdale (High Peak). This would lead to additional congestion at the M67 roundabout and increased traffic and congestion on the trans-Pennine routes.

Some respondents felt that because of the site proposal there would be no bypass development as the land would be taken up by the new development.

In relation to the southern site one respondent commented that access and egress to the site will put even more strain on the already congested M67 roundabout.

Many respondents in Hollingworth and Tintwistle highlighted the need for the proposed bypass to be extended around both villages to remove the traffic and reduce air pollution levels. Whilst a number of other respondents thought that a weight limit for vehicles should be introduced on the A57 and A628 Trans-Pennine routes.

Derbyshire County Council and High Peak Borough Council observed that the policy recognises that significant infrastructure improvements will be necessary and that a key project is identified as the provision of improvement works for the A57/A628 near Mottram and the construction of the Mottram-Tintwistle by-pass. Furthermore the response stated that County Council is likely to support the later proposal but that it should be noted that the proposal extends beyond the remit of the GMSF and would entail construction in the Peak District National Park and that this could raise local sensitivities. However, improvements to transport connectivity in this area are a particular priority due to the impact that congestion has on both the economy and environment and the council's welcome the opportunity to form part of the ongoing discussions on these matters.

CPRE objected to the proposal because it would require significant transport improvements which are included in GMCA's policy support (Policy SL7 Eastern Gateway; Policy GM6 Accessibility). CPRE specifically object to the inclusion of the Mottram Tintwistle Bypass and the Trans-Pennine Tunnel, due to additional road capacity increasing the number of car trips. CPRE further observed that rather than focusing on road building, GMCA should follow the conclusion of TfGM in its draft 2040 Vision for Transport para 315 that 'There is a need to work with neighbouring authorities to provide high quality, high capacity

sustainable transport alternatives in order to relieve pressure on the highway network'. CPRE suggested that GMCA should reconsider how these road schemes fit with its spatial framework and remove support for both schemes.

The Peak District National Park Authority (PDNPA) endorsed the response made by the Friends of the Peak District other than in respect of the comment made about the tunnelling of the A628, an engineering option about which they retained an open mind.

The Peak District National Park Authority was concerned about the selected of the subject site because of the severe additional pressure on the A57/A628/A616 corridor, both with or without any planned improvements. The PDNPA did not see the strategy as a sustainable option because of the knock on impacts of development on the surrounding road network, particularly in the National Park, where the aim should be to relieve traffic pressure, improve air quality and reduce carbon emissions.

Jonathan Reynolds MP stated that he would not support such a proposal, due to the existing traffic congestion in the area, until the full Mottram – Hollingworth – Tintwistle bypass is built.

Longdendale Community Group highlighted that the link between the proposed housing and industrial sites and the provision of transport infrastructure was vital and that no specific plans had been tabled regarding this. An additional point was made that the cumulative impact of previous developments had contributed to increased congestion on road and rail and that major infrastructure enhancements were required to deal with this legacy in addition to the impact from the development proposed sites. Therefore rather than producing a transport vision up to 2040 specific proposals are needed to address the requirements of each site.

Many respondents questioned whether any infrastructure improvements, such as the proposed bypass, would take place before any of the proposed development.

One respondent asked whether the issue of car parking for the additional dwellings had been considered. In addition a number of respondents highlighted the existing problem of 'pavement parking' by HGVs and cars in the area and that this would become worse because of the increased traffic levels generated by the proposed development.

Many respondents were unconvinced that improvements to cycling and walking infrastructure would help with mitigating against the impacts of additional traffic. Numerous reasons were stated for this including: air quality, dangerous roads/road safety, bad weather and poor route maintenance. Longdendale Community Group highlighted that there was currently no provision or proposal for safe cycle-ways relating to the proposed sites. Indeed they went on to say that the sites were ideally suited for car use because of their location on the motorway/trunk road location.

Many respondents suggested that major investment in road infrastructure, public transport, social infrastructure and other shops and services was needed before any development could take place.

Many respondents observed that rail capacity was an existing issue with trains from Broadbottom, Hattersley and Stalybridge already overcrowded during peak hours. The lack of free car parking at Stalybridge station was also highlighted as a problem.

One respondent additionally pointed out that the train stations at Hattersley and Godley were both dark, unmanned and unsafe.

One respondent observed that usage of the railway station at Hattersley had increased since the recent improvements and that this was a clear indication that investment in public transport improvements worked.

One respondent commented that they currently use the train and it is already significantly overcrowded with insufficient capacity for existing need let alone that generated by the proposed development. If this issue is not addressed then the planned housing growth could exacerbate the traffic problems further.

Many respondents commented that the bus service was poor or non-existent from the different parts of the Longdendale area in to Hyde.

Longdendale Community Group suggested that the existing canal network should be utilised for freight transport due to its energy conservative, fuel efficient nature.

United Utilities commented that several large pressurised water mains and sewers cut through the sites (mainly on the northern M67 parcel). Also there are existing UU easements which will need to be considered.

United Utilities also highlighted that consideration must be given to disposal of surface water in the most sustainable way.

Many respondents stated that there was a lack of infrastructure - schools, hospitals, dentists, GPs - all of which are massively oversubscribed and most respondents felt that additional people would compound these issues.

In addition several respondents questioned what incentives for using public transport would be put in place and what an efficient, reliable public transport service would look like.

Many respondents commented that the local health, education services and other services, such as policing, were already under strain and could not cope with any additional development.

Several respondents specifically commented that they thought educational standards would decline if class sizes grew too much as a result of children from additional housing being accommodated without sufficient new pupil place provision.

Several respondents felt that no thought had been given the infrastructure requirements of the area and that this was essential before any additional housing was delivered.

Furthermore, many respondents were not convinced that additional council tax revenue would pay for increased public services including policing, fire and rescue and ambulance.

[*Flooding, Water and Drainage*](#)

Many respondents expressed concern over the potential for increased flood risk from developing the green field site and highlighted the recent extreme weather events that caused flooding in Stalybridge in November 2016.

Respondents from the Four Lanes estate in Mottram specifically highlighted existing issues with drainage and potential flooding from further development in the area. Some respondents described the area to the north of the M67 as a 'semi-wetland' that was unsuitable even for grazing animals for much of the year.

One respondent highlighted that since the construction of the Lowry Gardens development the land is now waterlogged for most of the year and therefore serious consideration needs to be given to drainage. In addition a number of respondents highlighted the waterlogged nature of the fields around Mottram in January 2017 stating that this was clear evidence of the need to retain the Green Belt areas to manage rainfall and prevent flooding.

One respondent highlighted that in relation to the southern site that drainage would be a serious consideration and that development would put considerable strain on Hurst Clough Brook both on-site and downstream.

Many respondents highlighted that developing green space areas, such as the M67 North site, would lead to increased likelihood of flood risk. This was highlighted by the floods in Stalybridge in November 2016.

Some respondents suggested that there would also be a risk of contamination to water from pollution emanating from the proposed industrial development on the M67 North site.

The function of SUDS as a mechanism for attenuating surface water was questioned by one respondent who highlighted that *mappinggm* showed that land near the site was already at flood risk and that Stalybridge Road through Mottram regularly flooded.

One respondent made it very clear that the current policy text underestimated drainage problems as the site is saturated, often with standing water for eight months of the year. The respondent specifically highlighted that the situation had deteriorated after a drain was installed across the site when the Rushy Croft area houses were constructed. The water table

rose and some homes, higher numbers of Hyde Road, now suffer water draining from the field into their gardens. The respondent suggested that auxiliary drainage must be installed along the boundary between the site and adjacent homes as a safeguard against inundation in consequence of changes in ground level or inadequacy of the sustainable urban drainage provision.

Health

One respondent stated that the health target of 'improving the health of the population by 50%' was not specific enough as it did not identify any metrics that would enable measurement of success.

Many respondents highlighted recent research that identified a link between traffic pollution and Alzheimer's and were concerned about the potential worsening of congestion and pollution due to traffic generated by the proposed development. Many respondents highlighted that children walking to school were exposed to high levels of vehicle pollution.

Several respondents linked the current obesity problem, especially in children, to the continued loss of free sports and play areas, such as the recreation space to the south of the M67 and the wider green space of accessible countryside which is currently Green Belt.

The role of open space and Green Belt was highlighted as important to the mental health of residents.

Pollution and Air Quality

Many respondents, including Longdendale Community Group, commented that pollution levels were already very high and any further development would contribute to the worsening of the areas AQMAs because of emissions from additional traffic, and domestic and industrial development. The prevalence of health issues associated with poor air quality, such as adverse lung development and asthma in children and dementia, was highlighted by many respondents.

One respondent highlighted that Carbon dioxide, diesel particulates and other engine emissions increase exponentially as traffic slows below 10 mph (Based on Highways England technical publications). They went on to point out due to the congested and over-used nature of the road that in 2007 the average nitrogen dioxide reading along Mottram Moor was more than twice the recommended level and that the level of particulates was even worse.

One respondent questioned whether international and national plans to reduce greenhouse gases had been ignored during the preparation of the plan.

Industrial development in the proposed location is likely to cause noise, air and light pollution to neighbouring residential areas.

[Green Infrastructure, Biodiversity, Landscape and Access to the Countryside](#)

Many respondents observed that the fields to the north of the M67 are a natural habitat and home to a variety of flora and fauna (including badgers, foxes, deer, bats, amphibians, lapwings, and curlews) and should therefore be preserved.

In addition to identifying that the area to the north of the M67 is rich in wildlife many respondents highlighted that the area is also popular with walkers and birdwatchers.

Many respondents stated that the Green Belt land to the north provided an important wildlife refuge and acted as a wildlife corridor.

Cheshire Wildlife Trust highlighted that the site incorporated an area of Priority Woodland Habitat. In accordance with the mitigation hierarchy set out in the NPPF this area must be protected from development (i.e. avoidance measures). They suggest that a minimum 15 metre buffer is required to protect important habitat.

Cheshire Wildlife Trust also highlighted that consideration must be given to how development of this site would affect the Ecological Network for Greater Manchester. Furthermore they commented that a final decision should only be taken once this piece of work is complete and the wider implications for biodiversity are clear.

City of Trees commented that under bullet point 4 the green infrastructure should be described as extensive and high quality. Furthermore they proposed that extensive woodland buffers should be planted adjacent to major roads.

National Trans Pennine Trail Office commented that the inclusion of the Trans Pennine Trail in the policy indicated the importance of this strategic green transport route and that every opportunity should be taken to upgrade the surface for all legitimate users of all abilities, without discrimination.

The Longdendale Community Group objected to the proposed development because it would result in the loss of existing green infrastructure which would negatively impact on the connections between habitats.

Several respondents commented that green space was essential because of the multiple functions it played – protecting natural and semi-natural environments, improving air quality, preventing rural areas becoming absorbed into suburban expansion and providing accessible countryside areas that are available for walking, cycling and horse riding.

Many respondents objected to the loss of wildlife because it is an educational resource for adults and children.

One respondent commented that although the reasoned justification stated that there would be access for new residents to green space but it did not explain what would be done to maintain access to green space for existing residents.

Many people stated that one of the main reasons that they had moved to the area was because of the proximity to green space and open countryside and that this would be lost because of the proposed development.

Several respondents commented that the proposed development would negatively impact both physically and visually on the public footpaths. One respondent further highlighted that public footpaths linked through the area as part of a network connecting the open countryside connecting from Werneth Low in the south to Hobson Moor and on to the Peak District in the north and east. In addition the proposal to the north of the M67/A57 could lead to the elimination of existing public footpaths.

Many respondents objected to the loss of the recreation area to the south of the M67.

[*Heritage*](#)

Some respondents felt that the development of the northern site for industrial premises would adversely impact on the character of the historic villages conservation area, in particular the views across the site towards the south east are part of the setting. In addition the proposed industrial development would be highly visible from many parts of the conservation area and would adversely affect its character.

[*Housing*](#)

Many respondents highlighted that there was no demand for executive housing in the area and that affordable housing was required. Furthermore, many respondents commented that if executive homes were built on the site that they would mean a higher level of additional cars on the road due to the higher levels of ownership associated with them.

Jonathan Reynolds MP specifically disagreed that the southern part of the site could be delivered early in the plan period. Additionally he wanted to see a buffer zone incorporated into any plans in order to protect the gardens of existing properties, particularly on Hyde Road. Such a buffer zone was included in the old Longdendale district plan.

[*Housing Numbers*](#)

A number of respondents felt that the housing projections were too high, speculative and that the density/occupancy calculations were too low. Many respondents questioned the validity of the population estimates used and some specifically highlighted the use of out-of-date statistics and pre-Brexit assumptions.

Many respondents highlighted that the predicted population growth was too low to derive the proposed housing requirement from. This was highlighted by various assessments of the occupancy level as being too low and significantly below the current average household size. Furthermore some respondents linked the proposed housing growth to the likelihood of increasing both inward migration and out commuting, with the later adding to the existing congestion from natural population growth.

Some respondents questioned how the GMCA arrived at the increased population over the next 20 years.

One respondent stated that Tameside's GMSF requirement for 13,400 homes was based on a much lower house occupancy level which they believed to be incorrect.

One respondent suggested that accurate figures showed that half the numbers of houses were required.

One respondent did not agree that the population was rising fast as this did not quantify the extent of the requirement. They concluded that Tameside's population had plateaued.

[Peak District National Park](#)

CPRE objects to the two allocations due to impact upon the Peak District National Park, Green Belt (in the case of the north part of the site) and due to unsustainable traffic impacts of both parts of the site.

CPRE further stated that in National Parks environmental quality should be the primary criterion in the planning of road and traffic management. Any investment in trunk roads should be directed to developing routes for long distance traffic which avoid the Parks.

[Integrated Assessment](#)

One respondent pointed out that due to the potential for additional pollution from the development to contribute to the AQMA that the proposal scores negatively on the sustainability appraisal objectives for resident's health.

[Other Comments](#)

Many respondents felt that the proposal conflicted with the objectives and policies set out in the GMSF including: GM1; GM6; GM13; GM17; GM19; GM23

Some respondents highlighted specific conflicts with policy phrasing in the draft GMSF, such as: Green Belt in Greater Manchester will be retained; or major improvements will be secured in air quality for example.

Some respondents stated that they did not want Mottram to become over-developed and lose its 'village feel' and that any further development would lead to overcrowding.

A number of respondents commented that the proposal would result in the loss of land suitable for agriculture, specifically grazing.

Many people were concerned about a potential decrease in their property value because of the proposed industrial and housing development.

Some people commented that any additional traffic in the area would further impact on emergency vehicle response times.

One respondent commented that if the site was to be developed to the north of the M67 then a sensitive relationship with existing gardens should be implemented through design.

Many respondents stated that they had bought their properties because of the Green Belt countryside views to the rear and as a result they objected to the potential loss of this view to development.

One respondent suggested that it may not be valid to write into a proposed SPD that development of the proposed site would not be permitted until the Mottram by-pass had been built. It was suggested that legal advice should be sought on this matter because it may be held as unreasonable in an appeal against refusal of planning consent because no date has been given for completion of a bypass. A developer could argue successfully that they are being treated unreasonably by having consent withheld on the grounds that they have to wait for a bypass with no completion or start date.

A very large number of respondents, including Longdendale Community Group, highlighted the previous objections (including those from local residents, the Coal Board, Sport England, CPRE and United Utilities) made on the proposed site during the Core Strategy Preferred Options consultation and questioned why these had not been taken into account as part of the GMSF process.

Many respondents reiterated earlier comments submitted by CPRE, on Tameside's Draft Core Strategy, which highlighted a wide range of issues: increased traffic levels due to the lack of alternative modes; the encouraging of long distance commuting and undermining employment opportunities for local people; a high negative score in the SA in relation to objectives around the population's health; environmental quality; and use of the site would contravene saved UDP policies OL1 and OL4 because none of the permitted exceptions would be met.

Longdendale Community Group specifically highlighted that they felt that the community had not been involved in the plan making process and that the proposals were being developer rather than community driven.

Several respondents suggested that the proposal contradicted the proposed Core Strategy policy from 2013, where the Mottram M67 was safeguarded for future development after 2029 because the infrastructure problems needed to be resolved prior to any development.

[*Alternative Proposals and Suggestions*](#)

One respondent, although objecting to the proposal, stated it would be acceptable if a number of key issues were addressed. These included: prioritisation of brownfield development; easing local roadway congestion; ensuring the new development does not draw traffic from the A57; limiting the impact of development on neighbouring homes and gardens;

implementing auxiliary drainage to reduce groundwater transfer to homes adjacent to the site; recognise the value of existing PROW; and set out details of how each of the ten GMSF objectives on p234-235 will be met.

There should be greater community engagement, both through individuals and community groups, from the outset of the plan making process. This issue was highlighted both by individuals and community groups who felt that the level of publicity and engagement was minimal. Additionally many respondents commented that they found the consultation material complex and difficult to access.

Longdendale Community Group made a number of suggestions:

- More accurate predictions of housing requirement were needed based on the national level of housing occupancy;
- The plan should cover a more modest timescale, i.e. 10 years - one that is less speculative;
- An infrastructure plan should accompany the proposals setting out how the proposals would be catered for specifically in terms of transport.
- Better maps;
- Plain English – i.e. omitting planning speak;
- The plan should be free from policy contradiction;
- On the basis of corrected housing targets and surplus areas of Green Belt or other green space should be removed from the plan; and
- Consultation on the plan should have a much more pervasive dissemination – the document could be distributed with council tax bills.

OA27 North Ashton-under-Lyne Area

Who Responded

There were 479 submissions to this section. These were from 413 individuals, 29 couples or other family groups, no unknown people (name not supplied/illegible), Angela Rayner MP, Cllr Paul Buckley, and Tameside Green Party.

There were two submissions from developers/landowners:

- Richborough Estates Ltd & 'Trustees of the Stamford Estate'
- Wainhomes NW Ltd

There were three submissions from other organisations:

- Environment Agency
- Longdendale Community Group
- Natural England

Summary of Issue(s) Raised

Green Belt

The majority of respondents objected to the loss of the Green Belt based on a wide range of reasons: it prevents urban sprawl and the joining of settlements, particularly Ashton and Oldham, development would have an impact on openness, and would result in a loss of a recreational area for local residents, loss of public rights of way, impact on quality of life, loss of habitat, land which is an educational resource and an area that acts a store for rainfall and reduces the risks of flooding elsewhere.

Any newly established boundary at the parcel east of Lees Road was highlighted as one which would not follow clearly defined features such as the road itself and by many, one which would encroach on heritage assets such as Hartshead Pike and the Tithe Stone and have a detrimental landscape impact.

Many respondents highlighted that the Green Belt should not be used simply because land supply requirements could not be met elsewhere and because the Green Belt sites are convenient and easier to deliver. It was also observed that Green Belt provided the impetus to drive the regeneration of brownfield sites within Ashton town centre and that the release of the Green Belt was unwarranted.

Along with landscape impacts, many respondents were concerned about the impact which proposals would have on the rural feeling of this part of Ashton, the farming community, agriculture, farming as a local way of life and the change in dynamic that this would have on local communities.

Many respondents felt that regardless of any shortfall of land for housing that the Green Belt should just simply not be used.

Site Selection

Several respondents commented that it was not clear as to why sites had been selected and requested greater transparency as to the site selection process and why selected sites were selected. There was a general concern that sites were selected simply based on those promoted by the development industry as opposed to the most suitable locations and that this resulted in locations which were the easiest to bring forward being included rather than those which are most sustainable.

The majority of respondents supported a brownfield first approach to development with a focus on town centre and urban regeneration sites in locations which benefit from being better connected in terms of their sustainable transport infrastructure and having a wider range of supportive social infrastructure. Others identified former school sites and empty properties including shops which should be looked at first. It was suggested that information on the level of brownfield land which is within the baseline supply should be more readily accessible and transparent and several respondents were concerned that the sites risked detracting from the brownfield regeneration occurring within Ashton.

Other respondents suggested that a greater degree of focus should be placed on bringing forward brownfield sites on the edge of Manchester City Centre as opposed to using Green Belt land on the edge of the Greater Manchester conurbation. It was additionally suggested that to support the bringing forward of brownfield sites that a fund should be set up to assist with remediation costs and ensure sites are delivered.

Many felt that north Ashton was not the correct location for new development principally because already committed to development and recent housing schemes would lead to an inappropriately high density of development within the area when considered in conjunction with the strategic sites identified.

Several respondents suggested that the plan should be more flexible in its approach to selecting sites, to allow for the inclusion of windfall sites as the plan progresses and sites present themselves to only then make use of the Green Belt toward the end of the plan period if there is a shortfall at that time.

Many respondents believed that there was sufficient brownfield land to achieve the growth required.

Savills supported the eastern element of allocation OA27, either side of Lees Road, on behalf of Richborough Estates Limited and the Trustees of the Stamford Estate. Providing an overview of the sites suitability and deliverability and setting out that it could be delivered early in the plan period, the response assesses the contribution which the site makes against the five purposes of including land within the Green Belt, concluding that only very limited harm would arise should the site be developed. Indicative masterplanning of the site is provided showing it split into three clear parcels, two of which take access from Lees Road and the other from Whalley Grove.

Savills and Richborough Estates indicate concerns in relation policy requirements to establish a masterplan or SPD for the site principally due to its scale not meriting such an approach and the wider OA27 allocation also including land at Limehurst, as it is contested that the two elements of OA27 could be delivered independently of each other.

Between 375 and 450 units are indicated by Richborough as deliverable across the parcels at Lees Road which are indicatively shown to include public open space, play provision and incorporate areas of ecology and woodland. Richborough set out that compatible uses surround the site, including residential and the adjacent school. The site is stated to have good access to shops, public transport and local amenities, is available immediately and has no ownership barriers to bringing it forward. Richborough also envisage healthy demand from housebuilders and due to multiple frontages suggest multiple house building outlets could operate at once, speeding up delivery rates.

Emery Planning also support allocation OA27 on behalf of their client Wainhomes Developments Ltd, in particular the portion of the allocation located at Limehurst. Providing consideration of Green Belt, landscape, ecology, arboricultural, highways and deliverability matters, Emery Planning suggest the site is capable of delivering in the region of 100 dwellings. This is supported by indicative masterplanning of the site. Emery Planning similarly to Richborough request that clarity is given within the policy wording to enable the parcel to Limehurst to be brought forward independently to those at Lees Road.

The site is described by Emery Planning as a logical small scale urban extension that would relate well to the existing built up area of Ashton-under-Lyne. Informed by analysis undertaken by consultants Tyler Grange the resultant Green Belt boundary is described as being delineated by defensible, permanent and readily recognisable features. In support of the allocation, its set out that the site is highly locationally sustainable with access to a wide range of local services and public transport options, can accommodate development in ecological and highway terms, is within single ownership, has no legal constraints, would not place undue pressure on local infrastructure and services and could make a significant contribution to the 5 year land supply within the short term.

Infrastructure

The majority of respondents were concerned about the impact of the proposed development, alongside that which is already committed to, on existing transport infrastructure including the immediate and local highway network of north Ashton. Many pointed out that traffic had become worse in the area due to recent housing developments and that infrastructure improvements to alleviate existing problems were needed before any addition development.

Several also highlighted the lack of public transport provision within the area at Lees Road and were concerned that little detail was available on any measures that would be introduced to tackle these matters. Several cited that there was a need to improve public transport provision in the area as there are limited sustainable transport options such as tram, rail or frequent bus service.

Congestion in and around Hartshead Estate and Lees road in particular was a concern of many respondents with specific issues highlighted at St Albans Avenue, Hurst Cross junction, local secondary and primary schools. Concerns were also highlighted at Ashton Road/Oldham Road as a corridor and at other junctions further afield from the sites, such as at Kings Road, Queens Road and Lilly Lanes.

Many respondents were concerned about increases in rat running which would occur via St Albans Avenue itself as a result of the development and others cited the same issue with Alt Hill lane being used as a cut through route and this being harmful to the designation of the lane as a quite lane. In addition to the volume of traffic, many respondents were also concerned about its speed in using the two aforementioned routes.

Peak time traffic flows were cited by many as a particular issue which would be added to negatively, specifically identified locations were around Holden Clough Primary School and St Damien's High School where busses and refuse collection vehicles are cited as often struggling to gain access to local streets due to congestion. Associated with this, respondents were concerned about the impact on air quality locally from standing traffic at junctions and around local schools. Additional issues of air quality are stated, particularly around schools, but also for local residents during construction phases from dust and also disruption to children's learning environment during construction.

Many respondents had specific concerns about gaining access to the parcels of land, with several citing Whalley Grove as inappropriate due to its current nature as a quiet cul-de-sac which would be impacted upon negatively and the width of the highway being too narrow. Additionally the proximity of access routes to Holden Clough Primary School were identified as a concern due to the safety of

pupils and parents crossing the road and blind bends, existing issues which development would exacerbate.

Many respondents also had concerns, should the sites progress, about construction traffic on the local highway network.

The majority of respondents raised the impact on health care provision and education places as a major concern. The difficulty in obtaining medical or dental appointments, capacity at Tameside General Hospital and lack of school places were all highlighted as existing issues to support this argument.

Several respondents commented that the local Holden Clough Primary School is oversubscribed, obtaining a place was challenging and this was despite recent extensions to the School. Another respondent highlighted the challenges in access St Damien's High School as a faith school and the next nearest faith school was some distance away.

One respondent suggested growth could be positive, as a way to address some of the key social infrastructure challenges regarding health and access to the environment.

Many other respondents commented on the lack of other supportive social infrastructure, particularly to the Lees Road sites such as a lack of any formal play provision locally and other facilities for sport and play. Further to this a general lack of shops available for top up retailing were identified as an issue along with other facilities which have closed in the area recently such as Hurst Cross Library.

Several respondents highlighted the need to be clear and specific about what social infrastructure improvements would be required and provided by any new development. Many suggested that any financial contribution toward social infrastructure would not result in the change or level of mitigation required, while one response stated that any contribution was in effect a bribe to the Council and was at risk of disappearing into general Council funding.

[Flooding, Water](#)

Several respondents identified existing flooding which affects Alt Hill Lane and Lees Road. Fields to the east of Lees Road in particular are identified as regularly being waterlogged with water overtopping boundary treatments and flowing across Lees Road. The fields here are identified by one respondent to contain a series of ditches and channels vital to the management of water in the local area alongside a number of springs and water courses.

Many respondents commented on the flood water storage capacity of the land which would be impacted on negatively through development and increase the risk of flooding elsewhere locally through the loss of this storage capacity.

Foul and surface water drainage systems are commented upon by many respondents as being at capacity within the Lees Road area and development would place an unacceptable level of additional burden on these.

[Green Infrastructure](#)

Many respondents objected to the impact which proposed development would have on the accessibility and overall quantum of an area use for walking, cycling and horse riding along with other outdoor pursuits and which is an asset for public use. Routes to and from Park Bridge and Daisy Nook Country Park in particular were cited as needing to be protected and one respondent suggested that rather than just protection and retention of these assets, they should see improvement and enhancement.

Several respondents commented that the routes through the areas of Green Belt have rural characteristics and that they should not be sanitised as this is what contributes toward their quality. Many respondents cited the rural qualities of the sites as important for recreational, mental health and educational benefit and purposes. Many state that they are green lungs and provide areas of dark sky for ecological benefit.

One respondent commented that development would have a negative impact on the Park Bridge Heritage Centre as a tourist attraction as land around this will be lost for development.

Many respondents voiced concern about the impact of proposals on the ecology of the area, particularly areas designated for the ecological qualities including those identified as Sites of Biological Importance. One respondent cited that development should not directly adjoin these areas and that an appropriate buffer should be applied to avoid their degradation. Some respondents were concerned that the Cloughs would be filled in to facilitate development. Another respondent stated that no deterioration of the SBI should be explicitly mentioned in the policy.

Many respondents identified specific animals and species which they had seen present locally to evidence the value which the habitats provided. Those cited most often were foxes, bats, badgers, deer, rabbits, pheasant, hare, skylark, owl, jays, lapwing and hawk.

Several respondents identified the function that the sites play in supporting an ecological corridor from Daisy Nook to Harsthwaite Pike for the migration of wildlife and that this should not become fragmented. The negative impact upon ecology during and post development from noise and light pollution, is cited by one respondent to be of a concern.

One respondent commented that more detail ecological work needs to be undertaken to fully understand the impacts and what mitigation measures are needed.

Many respondents stated that development would have an unacceptable impact on areas of woodland, ancient woodland and specific trees identified as being of value. Many also objected to the loss of hedges which support wildlife and contribute to the rural characteristics of the area. One respondent identified that trees which are not currently protected are likely to merit such status if included within development schemes. Another respondent stated that the Cloughs are currently not appropriately managed.

[Heritage](#)

One respondent identified the potential for archaeology to exist within the sites at Lees Road with a former Roman Road cited as the basis for this opinion. Many respondents specifically identified the

impact on the landscape, Listed Buildings within it and specific local landmarks at Harsthead Pike, the Tithe Stone and communities at Twirl Hill as unacceptable.

One respondent identified that the architecture of any development should relate to the rural and agricultural references which are present in the landscape, including dry stone walling and that new homes should be designed in a way which ensures integration into the Green belt and not detract from its openness.

[Housing](#)

Responses on the type and tenure of the homes for the sites were mixed. Some respondents cited that affordable housing was inconsistent with the tenure of existing estates and that any new housing should ensure it attracted residents who would contribute positively to the local economy. While other respondents stated that the housing provided should include a mix of social and affordable products.

Several respondents stated that development should not be of a high density as this would be inconsistent with existing development.

Many respondents requested that the dwelling total across the site be split down as a number on a site by site basis and also some indicative timescales be given around likely delivery.

Some respondents objected to development of the sites due to the likely impact on property values and that compensation should be paid if this negative.

Several respondents were concerned about the level of growth being planned for and considered it unrealistic and that it should be re-assessed in light of Brexit as this may result in less land needing to be released from the Green Belt.

[Other Comments](#)

One respondent suggested that the Council should not be involved in the GMSF at all and should instead write its own Local Plan. Another suggested that to address the housing crisis consideration should be given to population control in relation to birth rates and immigration.

Many respondents were concerned with what they considered to be a lack of meaningful engagement with the local community. Many respondents stated that there should be direct contact of neighbours adjacent to sites selected. Many other respondents stated that the timing of the consultation was too close to Christmas.

Several respondents were stated they were concerned that economic growth seemed to be being met, ahead of the other elements of sustainable development and such things as the well-being of residents, ecology, climate change and air quality. One respondent stated that there appeared to be a lack of supporting jobs being brought forward alongside the housing planned and that this would lead to lots of out commuting.

A number of respondents were concerned that land banking would occur in relation to the sites and that the plan should ensure these opportunities are restricted and build out rates are expedient.

Several respondents felt that inclusion of the sites was contradictory to many of the other policies contained within the GMSF itself.

Some respondents were concerned that the development would increase the risk of crime in the local area. Another commented that the site included an area of land which is a private garden.

[OA28 Liverpool Road, Hindley](#)

Who Responded

There were 44 submissions to this section. These were from 41 individuals, one couple, no unknown people (name not supplied/illegible), no politicians, no developers/landowners, and the Environment Agency.

Summary of Issue(s) Raised

[Housing and employment need and supply](#)

Housing and employment development should not be accommodated on the site.

Where has the need for 30 dwellings on the site come from?

[Loss of Green Belt](#)

The minimum amount of Green Belt should be lost to enable the new road from the A58 Liverpool Road into the South of Hindley site. The site forms part of a critical Green Belt gap between Platt Bridge and Hindley.

The South of Hindley Masterplan shows the site will be retained as woodland/green space.

Releasing the site from Green Belt is contrary to the Wigan Local Plan Core Strategy.

[Highways, traffic and access](#)

The road network in Hindley is already overcapacity.

The proposed link road will only resolve existing traffic congestion, not the additional traffic that the proposed South of Hindley development will generate.

More traffic will increase the risk of traffic accidents.

[Nature conservation](#)

The area is an important wetland habitat and forms a link between the Amberswood Common SBI and Low Hall Nature Reserve

The proposal to mitigate flood risk on the site could upset the hydrological links between Amberswood Common SBI and Low Hall Nature Reserve.

[Open space and recreation](#)

The site should be retained as green space, which is well used by walkers.

[Schools, doctors' surgeries and dentists](#)

Local schools, GP surgeries and dentists are at full capacity and will not be able to accommodate demand from the site.

[Flooding](#)

The site is at the confluence of Borsdane and Dog Pool Brooks and is within Flood Zone 3. New residential and/or commercial development would increase flood risk, and be prone to flooding themselves.

[Air Quality](#)

Vehicles crossing the site to the proposed South of Hindley Urban Village will increase air pollution.

[Ground conditions](#)

Asbestos is present on the South of Hindley site and should be investigated by the Council rather than developers who might lie.

[Health](#)

Impact on wellbeing from urban stresses – air pollution, high density development, less green and open spaces, traffic congestion, noise, crime, more people in an area.

[Developer and stakeholders](#)

The EA want the allocation policy to refer to SUDS, green infrastructure, enhancing Borsdane Brook and cross reference other GMSF policies - GM7 Green Infrastructure, GM8 Nature Conservation and GM12 River Valleys and Canals. They also query whether the site could contribute funds to a flood risk capital scheme that has been identified upstream of the allocation.

Natural England recommends screening of the site (and all other GMSF allocations) to identify air pollution, recreational and water pollution impacts.

Two developers object to the allocation because there is safeguarded land in Wigan Borough that should be built on.

[Other issues](#)

The site is too small to be included in the GMSF.

[OA29 North of New Springs](#)

Who Responded

There were 96 submissions to this section. These were from 75 individuals, 15 couples or other family groups, no unknown people (name not supplied/illegible), Haigh Parish Council, one developers/landowners (Barratt Homes), and two other organisations: the Environment Agency, and Natural England.

Summary of Issue(s) Raised

[Housing need and supply](#)

New homes are needed to resolve the housing shortage in the UK, but there are more suitable housing sites in the borough than this one.

The borough's housing need should be met on previously developed sites in urban areas, and by occupying vacant properties and homes for sale, instead of releasing land from the Green Belt.

New homes on the site will be unaffordable to the majority of local residents.

There are no details in the GMSF about the size and type of homes proposed on the site and what proportion will be affordable.

The GMSF does not propose any housing allocations in the wealthy areas of Greater Manchester.

[Loss of Green Belt](#)

Building on Green Belt is contrary to the Wigan Local Plan Core Strategy which states that the Green Belt will remain unchanged.

Releasing this site from the Green Belt will be at the expense of redeveloping previously developed land and will not assist urban regeneration.

Green Belt sites are being proposed for development over previously developed sites because they are cheaper to develop.

[Highways, traffic and access](#)

Wigan Road is the main route to the M61 from Wigan town centre and is already severely congested at peak times (it can take over 30 minutes to travel a 2 mile journey). It is unable to accommodate additional traffic that would be generated by the proposal and other

proposed developments in the area, including at Kirkless Industrial Estate, the former Hovis bakery (both housing) and the GMSF proposal at M61 Junction 6 (employment).

HGVs and traffic accidents add to the congestion, which affects surrounding roads.

There are no details in the policy about how road infrastructure will be improved or how the site would be accessed. It would be difficult to widen Wigan Road because it is narrow and bounded by properties.

A new road is required between Wigan and Bolton.

Construction vehicles will cause significant disruption on Wigan Road.

The sewer beneath Wigan Road is repaired regularly because of the weak road surface. The additional traffic will make the problem worse.

[Nature conservation](#)

The fields and ponds on the site are important wildlife habitats for a variety of birds and animals including barn owls, yellow hammer, willow tit, bullfinch, tree sparrow, partridge, grey partridge, kingfishers, water voles, foxes, deer, badgers, water voles, woodpeckers and great crested newts.

The site should be subject to an Environmental Impact Assessment.

[Open space, recreation and landscape](#)

The site is a valuable area of green space and includes a footpath which runs through the site to Haigh Hall which is well used. The recreational value of the site would be lost if the site was developed.

The landscape character in this area is one of the best in the borough, and this will be lost if the site is developed.

If the amount of housing was reduced to 250 dwellings, the impact on the area would be less, and key features could be retained.

Landscape buffers should be created between the new housing and the canal and Haigh Country Park to preserve their settings.

Development would have an impact on TPOs on the site.

The site was used for open cast mining in the 1980s. It has taken two decades for the site to be restored to nature, which would be lost if the site was developed.

Development of the site would harm the setting of Haigh Country Park.

[Schools, doctor surgeries and dentists](#)

Local schools, GP surgeries and dentists are at full capacity and will not be able to accommodate demand from the site. Aspull High School was demolished in the 1990s.

The policy does not state which facilities will be expanded or where new facilities will be created to accommodate increased demand generated by the development.

[Ground conditions](#)

Excavating the site could affect the stability of nearby residential properties.

The site was used for mining in the past, and is likely to be constrained by land stability, mine shafts and contamination.

[Flooding and drainage](#)

Developing the site will affect natural drainage and may increase the risk of flooding to nearby properties, the Leeds Liverpool Canal and around the dam at Coppull Lane.

[Retail and town centre facilities](#)

There are few shopping facilities close to the site.

[Poor engagement](#)

The consultation period was too short and there was not enough publicity about it.

A drop-in session should have been held in Aspull.

[Air Quality](#)

Air quality in the area is poor and will be made worse by the additional traffic created by development on the site.

[Developers and stakeholders](#)

Haigh Parish Council believe the site is too large.

The developer supports the allocation.

Natural England recommend that the site and all other GMSF allocations are screened to assess the impacts on air and water pollution and recreation.

Lisa Nandy, MP for Wigan objects to the development because of the impact on traffic congestion on local roads.

[Other issues](#)

The views across the fields will be lost forever.

The residential amenity and privacy of nearby residents will be detrimentally affected by overlooking, increased noise and increased activity.

The development will make the area a less desirable place to live.

New housing will increase the risk of crime in the area.

[Comments on Sites Other Than Proposed Allocations](#)

A number of comments were received which did not relate to either the themes or allocations listed above, but were instead about other sites. Some of these sites were discounted as they did not meet the required criteria for sites, or because they were already in the existing land supply. The comments are available online. All sites submitted to the 'Call for Sites' were fully considered for inclusion either in the baseline land supply or in the allocations above.