

# **Greater Manchester's Plan for Homes, Jobs and the Environment (Publication Draft GMSF) 2020**

**Statement of Consultation (October 2020)**

**GMCA** GREATER  
MANCHESTER  
COMBINED  
AUTHORITY

# Contents

<b>Contents .....</b>	<b>1</b>
<b>1. Introduction .....</b>	<b>2</b>
<b>2. PART A – Summary of Consultations .....</b>	<b>3</b>
2.1. Statement of Community Involvement Compliance .....	3
2.2. Greater Manchester Spatial Framework Scoping survey 2014 .....	3
2.3. Draft Greater Manchester Spatial Framework Vision, Objectives and Options, Winter 2015/16 .....	3
2.4. Draft Greater Manchester Spatial Framework, Winter 2016/2017.....	8
2.5. The Plan for Jobs, Homes and the Environment (GMSF) January to March 2019 .....	11
<b>3. PART B - The Plan for Jobs, Homes and Environment (Revised Draft GMSF) (2019) Consultation Report.....</b>	<b>13</b>
3.1. Thematic Policies .....	15
3.1.1. Context of GMSF .....	15
3.1.2. Our Vision.....	18
3.1.3. Our Strategy .....	23
3.1.4. A Sustainable and Resilient Greater Manchester.....	63
3.1.5. A Prosperous Greater Manchester.....	70
3.1.6. Homes for Greater Manchester.....	75
3.1.7. A Greener Greater Manchester.....	86
3.1.8. A Greater Manchester for Everyone.....	92
3.1.9. A Connected Greater Manchester.....	97
3.2. Strategic Allocations.....	105
3.2.1. Cross-Boundary Strategic Allocations.....	106
3.2.2. Strategic Allocations in Bolton.....	136
3.2.3. Strategic Allocations in Bury .....	151
3.2.4. Strategic Allocations in Manchester .....	168
3.2.5. Strategic Allocations in Oldham .....	178
3.2.6. Strategic Allocations in Rochdale.....	262
3.2.7. Strategic Allocations in Salford .....	290
3.2.9. Strategic Allocations in Stockport.....	322
3.2.10. Strategic Allocations in Tameside .....	350
3.2.11. Strategic Allocations in Trafford .....	384
3.2.13. Strategic Allocations in Wigan.....	392
3.3. Further comments .....	423
3.4. Delivering the Plan .....	426
<b>4. Appendix A: Statement of Community Involvement Compliance Summary.....</b>	<b>429</b>
<b>5. Appendix B: New Sites Submitted in 2019 .....</b>	<b>432</b>

## 1. Introduction

- 1.1 Following a recommendation from AGMA Executive Board in November 2014, the 10 Local Planning Authorities in Greater Manchester (Bolton, Bury, Manchester, Oldham, Rochdale, Salford, Stockport, Tameside, Trafford and Wigan) agreed to prepare a joint Development Plan Document to set out the approach to housing and employment land across Greater Manchester for the next 20 years. In November 2014 the first devolution agreement provided for an elected Greater Manchester Mayor with responsibility to produce a Spatial Strategy.
- 1.2 Following a scoping consultation in 2014 and a consultation on the vision, objectives and options in 2015/16, the first full draft of the GMSF Development Plan Document (DPD) was published for consultation between 31st October 2016 and 16th January 2017.
- 1.3 The first Greater Manchester Mayor, Andy Burnham, was elected in May 2017. The Mayor promised a 'radical re-write' of the first GMSF and it was intended that the next draft plan would be prepared as a Mayoral plan (a Spatial Development Strategy, SDS), the first prepared outside of London. The Spatial Development Strategy regulations were not fully in place to allow for the preparation of the type of Spatial Development Strategy required, so the GMSF continued as a Development Plan Document and the consultation in January 2019 as with the earlier consultations was undertaken under regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012
- 1.4 In part A, this report sets out a summary of the following consultations:-
  - Greater Manchester Spatial Framework Scoping survey 2014
  - Draft Greater Manchester Spatial Framework Vision, Objectives and Options, Winter 2015/16
  - Draft Greater Manchester Spatial Framework, Winter 2016/2017
  - The Draft Plan for Jobs, Homes and the Environment (GMSF Revised Draft) January to March 2019
- 1.5 In part B, the report provides a summary of the representations received to the consultation to The Plan for Jobs, Homes and the Environment (GMSF) 2019 and the GMSF/District responses.

## **2. PART A – Summary of Consultations**

### **2.1. Statement of Community Involvement Compliance**

2.1.1 Each Greater Manchester District has adopted their own Statement of Community Involvement (SCI). A SCI sets out who, on what and how each district will consult key stakeholders and members of the public on the preparation of the Local Plans and planning proposals. All consultations to date on the GMSF have been in conformity with each district's SCI. Appendix 1 comprises a table summarising the methods used by each district during the consultation on the Plan for Jobs, Homes and Environment (Revised Draft GMSF) (2019) to meet the requirements of their SCI.

### **2.2. Greater Manchester Spatial Framework Scoping survey 2014**

2.2.1 A detailed survey was prepared to be read in conjunction with an evidence report and supporting documents. Responses were collected through an online survey, email and post. To promote the consultation the Greater Manchester Integrated Support Team (GMIST) sent out emails to contacts that had been consulted on the Greater Manchester Strategy (GMS). Social media (Twitter) was also used.

2.2.2 The survey closed on 7 November 2014 and a total of 94 representations were received, 45 through Survey Monkey and 49 were submitted by email or post to GMIST. The consultation response helped to shape the next stage in developing the Spatial Framework and its Vision, Objectives and Options.

### **2.3. Draft Greater Manchester Spatial Framework Vision, Objectives and Options, Winter 2015/16**

2.3.1 A consultation on the draft vision, strategic objectives for the GMSF, three potential growth options and five background papers was published for public consultation between the 9 November 2015 and 11 January 2016. A "call for sites" exercise was also undertaken alongside the consultation exercise and local residents, businesses, land owners and developers were invited to identify sites that could be suitable for housing or employment development. Whilst an initial deadline of 11 January was set for the call for sites exercise the map remains available to anyone wishing to submit a site. Briefings were offered to MPs in Manchester or London but this offer was not taken up.

2.3.2 Representations were submitted by a wide range of respondents including other Local Authorities (including adjoining districts), service providers, housebuilders, planning consultants and land and property developers. There were a number of environmental groups represented as well as a number of individual responses and others from interest groups

2.3.3 Over 180 responses to the consultation were received (just over 140 to the options paper 40 to the background papers). Just under 25% of responses were made online (i.e. through the Objective system) and the majority of the rest by email.

2.3.4 The Options consultation consisted of six documents - one options document and five background papers. The background papers include: Area of Assessment; Economic Development Needs Assessment; Objectively Assessed Housing Need; Infrastructure and Environment and Integrated Assessment.

- Area of Assessment - identifying the overall area of assessment, and the implications for translating need and demand into individual district requirements;
- Economic Development Needs Assessment - identifying the evidence that informs employment floor space requirements;
- Objectively Assessed Housing Need - identifies the evidence available to inform the objectively assessed housing need for GM;
- Infrastructure and Environment – this paper begins to identify and draw out key strategic issues for GM; and
- Integrated Assessment – an independent report, produced by Arup, which provides a Sustainability Appraisal (SA), Strategic Environment Assessment (SEA), Equality Impact Assessment (EIA) and Health Impact Assessment (HIA).

2.3.5 Representations were submitted by a wide range of respondents including other Local Authorities (including adjoining districts), service providers, housebuilders, planning consultants and land and property developers. There were a number of environmental groups represented as well as a number of individual responses and others from interest groups. The key issues raised across the various topics covered in the draft plan are set out below. Full information on the consultation responses can be found in the “GMSF Winter 2015/16 Consultation - Summary of Responses Received (October 2016).”<sup>1</sup>

#### **Key Messages - General Consultation**

- Respondents wanted to ensure that the Duty to Co-operate is fully met, with GM engaging with adjoining authorities and private sector, such as the house building industry, effectively;
- The objectives should reflect the differences between the ten GM authorities;
- GMSF must set out the scale and distribution of housing and employment for the 20 years following its adoption, not the next 20 years;
- The GMSF should clearly set out what it will and will not be dealing with;
- The GMSF should clearly set out what the role of Local Plans will be;

#### **Key Messages - Area of Assessment**

- Ensure existing communities benefit not suffer from planned new development;
- Embrace Natural Capital rather than seeing it as a constraint;
- Look at the potential of meeting some of GMs OAN in areas outside of GM.
- Make reference to the retention of local services and community facilities;
- Without a SHMA or a SHELAA there cannot be a clear understanding as to the scale and mix of housing and the range of tenures that the local population is likely to need over the plan period

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<sup>1</sup>An electronic version of the document is available at <https://www.greatermanchester-ca.gov.uk/what-we-do/housing/greater-manchester-spatial-framework/gmsf-2016-draft-archive/>

### **Key Messages - Economy**

The following key messages and requests were provided by respondents:

- Recognise the substantial growth in emerging sectors – such as innovation and technology, creative and digital industries, and life sciences – and how this will affect demand for modern workspaces;
- Recognise the ambitions of the Northern Powerhouse;
- Make more reference to the city centre and regional centre as key drivers of the regional economy;
- Highlight the explicit link between house building and economic growth;
- Emphasise the economic impacts of significant infrastructure projects such as High Speed 2;
- A more thorough assessment of the quality and viability of employment land this supply is required;
- Need to ensure that the GMSF employment land requirements have been prepared on a proportionate evidence base which complies with the guidance in paragraphs 160 – 161 of the NPPF

### **Key Messages - Environment**

- It is considered that the strategy is overly dominated by an economic agenda, with environmental and social factors not being given equal consideration;
- GMSF should make specific reference to synergies between with climate change mitigation / adaptation;
- GMSF needs to strengthen its approach to waste management and the role of energy from waste;
- GMSF needs to acknowledge an increased surface water flood risk through new development;
- Green and blue Infrastructure assets – both individually and as a strategic network – are important, as are their role in people’s physical and mental wellbeing.. ;
- Inadequate reference is made to poor air quality. and that the credibility of the GMSF is reduced through contradictory statements, where it suggests addressing air quality issues is a priority and yet discusses is reduced by contradictory statements relating to increased air travel and more road building;
- It should be recognised that heritage assets are an important element of green infrastructure as they generally preserve both cultural and historically significant assets;

### **Key Messages - Housing**

- A shortage of housing is the key constraint to quality of life across GM;
- There is an over-reliance on middle- to high density development in the inner core;
- GMSF is too focussed on the number of new homes needed and no consideration is given to size, type, and tenure of this requirement;

- The type and location of new housing is critical to securing economic growth and tackling constrained labour mobility;
- The document does not make enough reference to the relationship between transport infrastructure and development;
- GMSF overlooks the health problems associated with a lack of appropriate housing provision;
- There is a clear role for GMSF in design and housing standards;
- It is not just about new homes, it is also about the repair, renewal and replacement of existing homes;
- Urban extensions should be considered;
- There is concern with delivery that the current supply is not viable and needs a comprehensive review.

### **Key Messages - Place**

- Place-making issues are not given sufficient strength and importance in GMSF;
- There needs to be clarity around what sites are strategic and non-strategic;
- Establish a more detailed evidence -led network or hierarchy of centres;
- There should be more reference to the city centre as a key driver of regional economy ;
- There should be more reference to town centres as key drivers of their local economies and there was general support for the town centre first approach;
- Media City and Salford Quays should rank alongside the commercial core of the City Centre as an office location due to its location and accessibility;
- The existing and future provision of industrial and warehousing development is biased towards the west and south-west of GM. Provision should be made in the east and north-east of GM too;
- Respondents recognised that it was likely that not all development would be on brownfield land and argued that brownfield sites should be complemented with new settlements and sustainable urban extensions;
- Re-use existing buildings and previously developed land prior to greenfield land; and
- The release of green belt land which is otherwise unconstrained should be prioritised ahead of the development of non-green belt land which would result in significant environmental harm.

### **Key Messages - Transport**

- There should be a stronger linkage with the Transport Strategy 2040;
- Transport should have its own theme alongside economy, place and people;
- The Strategic Objectives should make reference to the Metrolink and proposed expansion;
- There should be more emphasis on reducing the need to travel and modal shift;
- GMSF needs strengthening in the area of sustainable transport;

- Opportunities should be capitalised on (e.g. Manchester Airport, Port Salford and HS2/3);
- There needs to be reflection on the scale of congestion and, the issues it causes and the measures and investment required to resolve them;
- GM should make a commitment within the GMSF to avoiding building- in car dependency in new developments;
- Recognise the role that aviation plays in creating carbon and other harmful emissions; and
- Identify a clear delivery strategy for the Manchester Ship Canal.

### **Key Messages - People**

- Add an ambition and vision to “improve the health and well-being of Greater Manchester”;
- Include indicators to show increases in health, well-being and quality of life;
- Include reference to mental health as a key goal of the strategy;
- Increase focus on social objectives and how they integrate with growth priorities;
- Detailed points about assumptions for migration; household formation; and the differing needs of different households.

### **Key Messages – Social Infrastructure**

- There is a need for a GM wide health strategy with the coordination of JSNAs through a GM wide assessment;
- There needs to be a specific reference to meeting an increasing older population who would not be in employment;
- Increase focus is recommended on social objectives and how they integrate with economic priorities;.
- Greater focus is required on the role that the historic and environmental assets play on social roles;
- The GMSF should show how the provision of community infrastructure such as sports facilities across GM will be influenced; and
- Include reference to the quality and quantity of education provision across GM.

### **Key Messages - Options**

- The vast majority of representations are against Option 1;
- As with Option 1, Option 2 has been discounted by a number of responders as not aligning growth with the vision of the GMSF to compete successfully on a global scale and constrains aspirations of the Northern Powerhouse, devolution agreement and the GM Growth Deal;
- Options 2 and 3 are argued, by some, to be completely unsustainable and unrealistic.;
- The Options presented are unsubstantiated in sustainable development terms, being based purely upon growth scenarios and not, for example, any proper assessment of the impacts of each upon environmental capacity. A balance is needed;.



- The Options need to be clearly linked to infrastructure provision including raw materials;
- A number of representations expressed concern that Option 3 was just dismissed as being too ambitious and not seriously assessed, when it is the only one that fits with the Vision;
- A compromise option put forward by a number of representations is one between 2 and 3.: An option based on 2 but with a managed ambition to pursue 3;.
- Other options include a more sustainable option, an enhanced critical mass such as at Carrington, or an option commending the idea of the Garden City.

## **2.4. Draft Greater Manchester Spatial Framework, Winter 2016/2017**

- 2.4.1 The consultation ran from 31 October 2016 to 16 January 2017, however, prior to consultation going live, an active Blog with articles covering GMSF themes was posted weekly. During the consultation, a range of methods were used to ensure the public and those interested in the GMSF were aware of the consultation. The local authorities and the GMCA held over 50 public consultation events throughout GM. The public events were well attended with many recording over 300 attendees. In addition, a number of districts held area committees, township and parish council meetings and six events were held at the GM level to engage organisations with a particular interest. These included elected Members, environment groups, industry and housebuilders and up to 70 organisations were represented at individual events.
- 2.4.2 The draft document on the GMCA web site received over 40,000 direct hits and a similar number of people accessed the documents on the consultation portal. The level of web traffic related to the GMSF surpassed any traffic related to anything else on the GMCA webpages. Manchester Evening News (MEN) articles on the GMSF were accessed 649,635 times and generated 5,483 clicks through to the GMSF webpage.
- 2.4.3 Social media reached over 240,000 twitter accounts over the consultation period and the GM Spatial Framework gathered 1,068 followers. Tweets provided information about the draft GMSF including the dates and links to the consultation and relevant data/proposals in the plan. The GMSF e-news bulletin received over 1000 subscriptions.
- 2.4.4 The consultation generated a lot of interest with MP's for the Greater Manchester area debated the [GMSF](#) on 14th December 2016. In total 97 articles were published in local newspapers and the consultation featured on regional news programmes on the BBC and ITV and on BBC Radio Manchester. Existing local groups and new protest groups formed to oppose the release of Green Belt in sites across GM and submitted representations on mass and organised several protest marches.
- 2.4.5 At the end of the consultation approximately 19,800 comments had been received. Over 2,600 were submitted online, 8,000 via email representations and approximately 9,200 by letter. It is estimated that 80% were about sites and 20% were on the strategy and thematic areas.

2.4.6 The key issues raised are set out below. Full information on the consultation responses can be found in the “Comments Received on 2016 GMSF Draft.”<sup>2</sup>

### **General Comments**

- Questions and concerns around the decision making process and the relationship between the GMCA and the ten local authorities.
- How GMSF links to Local Plan processes.
- Concerns about how the plan was developed.
- Concerns over the timing and nature of the consultation
- Concerns over the information provided

### **Vision and Strategy**

- Mix of views on whether the vision and strategy was positive or negative across a whole range of issues.

### **Thematic Policies**

- Mix of views that were generally supportive of the 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.
- Significant opposition to proposals for development in the Green Belt.
- Proposed growth is likely to increase pressure on health and social care services
- Concern about impact on air quality, climate change, ecology and heritage
- Opposing views on whether the employment and housing forecasts and subsequent identified requirements were too high or too low
- Needing to account for vacant office space and take on board changing patterns towards home working
- Conversion of offices to apartments
- Accessibility of employment opportunities
- Importance of high quality green infrastructure and street trees in setting the scene for inward investment
- General support for the retail, leisure and tourism policy approach
- Need for more recognition to be paid to the historic environment
- Distribution of new housing – clarity on how the growth targets have been set, and how this represents a sound, suitable and sustainable approach to growth.
- Not clear in GMSF how the phasing of new housing will be calculated

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<sup>2</sup> <https://www.greatermanchester-ca.gov.uk/media/1746/summary-of-consultation-responses-gmsf-2016.pdf>

- Housing that is to be developed would be the housing that would not meet affordable demand
- Require a clear policy of brownfield first and then as a matter of very last resort the green belt could then be assessed
- Link between housing development on the scale proposed and the fact that the current infrastructure simply would not cope
- No detail on the tenure mix of any new housing and that there should be a more explicit statement of the overall mix required
- Too much emphasis on the building of apartments rather than houses and in particular family homes
- Impact of Brexit on housing and employment needs
- Recognising the need for specific products to meet the needs of the growing older population.
- More required on the link with housing and health
- More of a focus on quality and design rather than just a focus on numbers
- More investment needed into transport infrastructure
- Accessibility vital, critical or pivotal to the overall success of GMSF.
- Various matters raised around infrastructure delivery including section 106 and Community Infrastructure Levy
- Support for the proposal for increasing green infrastructure
- Disjoint between Economic Growth Policy and green infrastructure
- Due consideration is given to the provision of local growing spaces within development and housing plans
- All developments should provide a net improvement in biodiversity value wherever practicable.
- Concerns that with the development of Green Belt sites policies will not protect nature conservation for future generations
- No mention of SSSI sites and how these will be protected
- General support for trees and woodlands policy from residents and organisations stating the benefit of trees in terms of overcoming pollution and improving surface water runoff and natural flood management.
- General support for the Uplands policy and the recognition of the Uplands in the GMSF.
- General support for the Lowland Wetlands 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.

- Various comments made about policies on River Valleys and Recreation with specific suggestions for policy wording changes
- Policies on Carbon Emissions and Resilience generally supported whilst making specific comments on potential wording changes
- Mixed response on the Air Quality policy with concerns that the policy does not go far enough to deal with air pollution challenges in the conurbation
- General support for the Flood Risk and Water Quality policy with concerns about building on green spaces and the Greenbelt could increase the risk of flooding
- Significant objections to the proposals for development in the Green Belt and suggestions there was a need to consider alternative options. Conversely support from some sectors for development proposals in the Green Belt agreeing there were exceptional circumstance that justified the approach
- Social infrastructure already struggling to cope with existing demand as a result of recent housing developments, cuts to services and lack of key workers.
- Concern over the additional impact of the proposals within the GMSF for additional housing and employment development.
- Education, Skills and Knowledge policy too vague with no clear indication of how the shortfall of school places, arising from the proposed additional housing, will be met.
- Concerns raised over the existing shortfall of nursery, primary and secondary school places.
- Majority of respondents indicated that healthcare provision (hospitals, GP surgeries, mental health services, dentists etc.) in their area was already inadequate or overstretched.
- General support for the Design policy but concerns regarding implementation
- Concerns the Heritage policy was insufficiently specific about Greater Manchester

### **Proposed Allocations**

- A significant level of comments received on the specific allocations identified in the plan. The consultation responses for the allocations can be found in the full consultation document noted above at paragraph 2.4.6.

## **2.5. The Plan for Jobs, Homes and the Environment (GMSF) January to March 2019**

- 2.5.1 As a joint plan of the 10 local authorities the draft GMSF covers a wide geographical area and both strategic policy as well as more site specific issues around the allocations. The consultation on the plan had to reflect the strategic nature of the plan but also its more detailed application in local areas around the site allocation policies. The consultation and communication strategy sought to ensure that people knew about the plan and signpost them to where they could find more information. The consultation was for an 8 week period (statutory minimum of 6 weeks required), and closed in March 2019

## Proactive communications

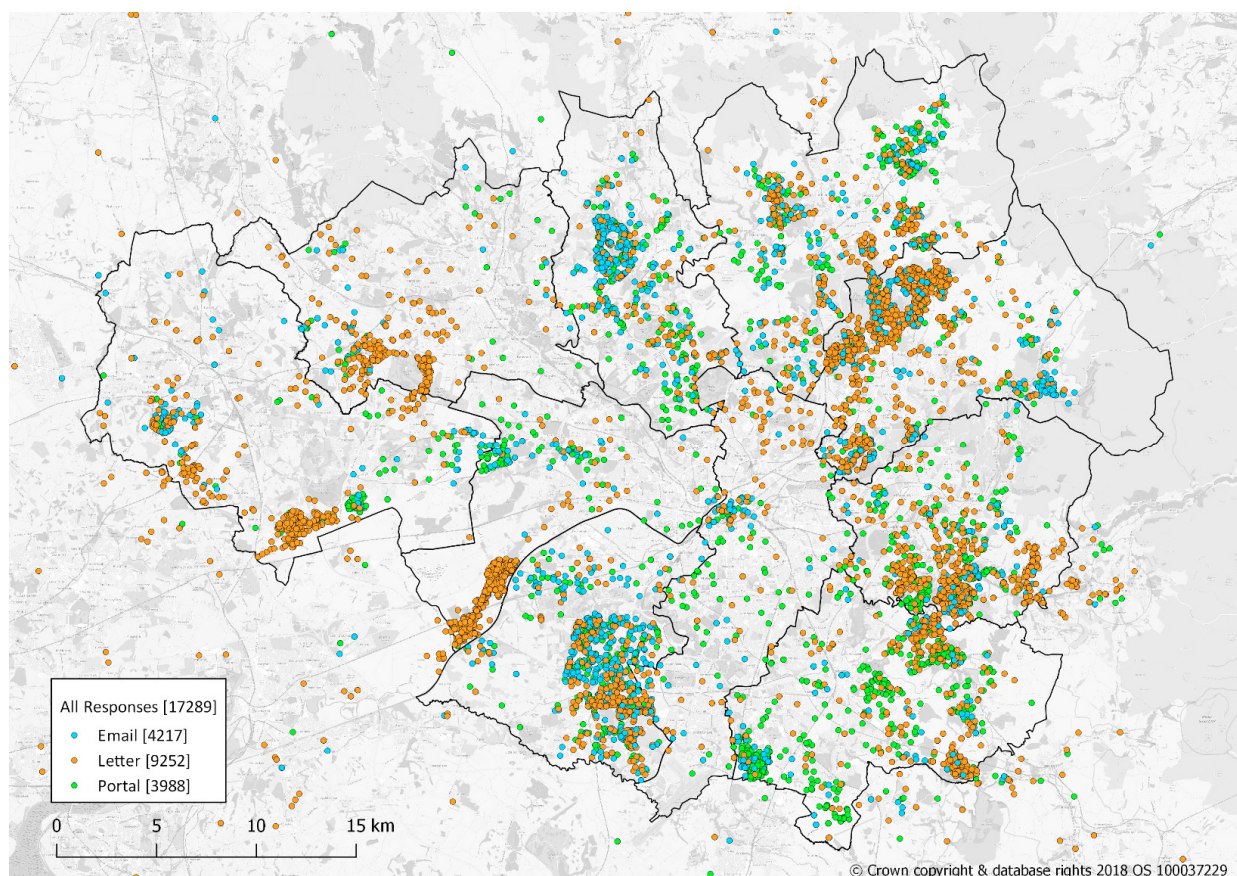
- 2.5.2 Regular newsletters were sent in the lead-up to the consultation and during the consultation period, two e-newsletters were sent to people on the GMSF mailing list.
- 2.5.3 The GMCA web pages relating to the spatial framework had 69,491 page hits and the GMSF document itself was available for download via an online publication tool (called Issuu, which aims to give people easier navigation around the document).
- 2.5.4 The @GMSpatialFrame twitter account was used for proactive communications and then utilised other linked accounts to get the message out, including @MayorfoGM and @greaterMcr. Throughout the consultation, #GMSF2019 and #GMSF were consistently used in our proactive communications.

## Events or activities

- 2.5.5 Launch event:** On January 7, the Mayor and Leaders from across Greater Manchester hosted an event to set the scene for the future of Greater Manchester. This event tied together themes from the Greater Manchester Spatial Framework, Clean Air plan, 2040 transport plans and other key GM priorities including the Local Industrial Strategy and Cultural Strategy. This event received extensive coverage both locally and national.
- 2.5.6 District events:** The GMSF is a joint plan of the 10 districts and the consultation was carried out in compliance with the 10 Statements of Community Involvement (see Appendix A). Events were held in all districts for members of the public to attend. All of the events were publicised on the GMCA website and used centrally produced material. During the consultation, 58 of these drop-in sessions were hosted, with over 200 hours spent carrying out the activity. These had mixed attendance from 20 people to a couple of hundred. Over 10,000 information postcards were distributed telling people how to find out more.
- 2.5.7 Greater Manchester – sector specific events:** Three Greater Manchester wide, sector specific events were also held during the consultation. One, organised by the Greater Manchester Green Belt groups was attended by the Mayor to have a face to face conversation about the proposals. The second event was with the Voluntary, Community and Social Enterprise Sectors, which included those representing people from minority groups and communities, to discuss the potential impact of the plan on the sector and the third session was with the Disability Network group for Greater Manchester.
- 2.5.8 Greater Manchester -wide events:** A stakeholder discussion event was hosted by the Mayor and Greater Manchester Portfolio Lead Paul Dennett; bringing together over 50 stakeholders from the development, housing and community sector. In addition, two Mayor's Question Time events were also hosted within the consultation period, in Tameside and Wigan. The GMSF figured strongly in the questions raised and discussed.
- 2.5.9 Media and paid promotion:** During the consultation £1k was spent on social media advertisement on Facebook and five news articles were issued through the consultation about the plan.

### 3. PART B - The Plan for Jobs, Homes and Environment (Revised Draft GMSF) (2019) Consultation Report

- 3.1 This section of the report provides a summary of the issues raised by respondents in relation to the Plan for Jobs, Homes and Environment (Revised Draft GMSF) (2019) along with responses from the GMCA and GM Local Authorities, setting out how the issues raised have been addressed either through changes to the plan or an explanation as to why the issue has not resulted in any changes. The issues have been grouped thematically to help readers understand the range of issues raised and the interconnections between them. The comments are presented as submitted and are the views of respondents. They should not be interpreted as statements of fact and are not the views of the Greater Manchester Combined Authority (GMCA) or other Greater Manchester (GM) local authorities. Where comments from a number of people/organisations cover essentially the same point, they have only been included once. Please note that all references to policy numbers are the numbers used in the 2019 draft. Some policy numbers have been amended in the 2020 draft.
- 3.2 In all just over 67,000 comments on the draft GMSF were received from around 17,500 people and organisations via the consultation portal, email and letter. The geographic distribution of the responses can be seen in Figure 1



**Figure 1: Distribution of responses**

- 3.3 The vast majority of respondents focussed on one or more of the strategic allocations (79% responded to questions relating just to allocations) rather than the thematic parts of the draft GMSF.

- 3.4 The structure of this document mirrors that of the Greater Manchester Spatial Framework (GMSF) 2019 consultation. This document has two main sections; the first covers the 'Thematic policies' (relevant to the whole of Greater Manchester), the second covers the proposed 'Allocations'. Comments received relating to the evidence base which supports the plan have not been set out in detail here but have informed the new and revised evidence which has been prepared to support the GMSF 2020.
- 3.5 All of the issues raised have been considered and inform the publication version of the plan, the GMSF 2020, now under consultation. The submissions to the 2019 consultation can be found in two ways.
1. Via [https://www.gmconsult.org/consultation\\_finder](https://www.gmconsult.org/consultation_finder) (search for gmsf) This includes all letters and emails – as well as the submissions made via the portal.
  2. Alternatively, all submissions are available on the Combined Authority website [www.greatermanchester-ca.gov.uk/gmsf-responses](http://www.greatermanchester-ca.gov.uk/gmsf-responses) via an excel sheet of all of the responses that were made. There is also the ability to search for all of the additional information and submissions as an attachment



### 3.1. Thematic Policies

#### 3.1.1. Context of GMSF

There were 1,224 comments in relation to the context of the plan. The context of the plan sets out an overview of Greater Manchester and its strengths alongside some of the challenges it faces. In particular the chapter looks at Core Growth areas, international connections, the Northern Powerhouse, inclusive growth and Greater Manchester’s aim to be a top global city.

The majority of the comments in this section focussed on the process of plan making, the need for infrastructure to deliver the plan, the balance of development, Green Belt release and housing development.

More detailed comments in relation to specific elements of the policies are set out below.

<b>Plan Making</b>
<ul style="list-style-type: none"> <li>• The plan would not deliver the housing and employment growth required to meet the ambitions of the City Region. Focus on reducing Green Belt release has come at the expense of meeting housing and employment need.</li> <li>• The timescale is unrealistic and is reliant on an extremely short examination period. It is common for examinations to last two years, which would mean the plan would not be adopted until 2022. The plan period lasting until 2040 would give greater flexibility. Delayed adoption could result in a plan period shorter than 15 years.</li> <li>• It is important that the GMSF to be able to make land use designations and amend the Green Belt as failure to do so would lead to delay while constituent Borough plans are advanced to re-designate allocated sites. The GMSF must stress that strategic allocations will come forward even if an up-to-date local plan has not been prepared.</li> <li>• Given the important of the Accelerated Growth Scenario in underpinning the ambitions of the Northern Powerhouse, it is essential that the GMSF adequately provide for a sufficient labour force to facilitate the level of job growth forecast. The baseline scenario forecasting growth of 110,000 jobs whilst also forecasting a decline in the working age population raises questions over the core assumptions underpinning the model.</li> <li>• The proposed new development will adversely affect physical infrastructure such as bridleways and walking routes with walkers, cyclists and horse riders forced onto increasingly congested roads. The increase in traffic would not be sustainable.</li> </ul>
<b>Infrastructure</b>
<ul style="list-style-type: none"> <li>• The proposed new development will adversely affect social infrastructure. Doctors, dentists and schools are already oversubscribed so further development would mean even longer waiting times than there are presently for vital services.</li> <li>• There is too much emphasis on the idea of expanding travel opportunities at a time when more people are working remotely either from home or elsewhere rather than commuting into the office.</li> <li>• More emphasis should be placed on the need to maintain current road infrastructure by filling in potholes rather than building new roads.</li> <li>• General opposition to HS2 expressed. It was suggested that the costs involved in the project be used to improve transport links over a wide area of the Northern Powerhouse region.</li> </ul>



<b>Green Belt</b>
<ul style="list-style-type: none"> <li>• Opposition to any release of Green Belt land and the suggestion that formerly developed or 'Brownfield' sites should be prioritised for development.</li> <li>• The proposals are not in line with the mayors three clear principles – brownfield first, priority development in town centres and protecting the Green Belt.</li> <li>• Recreational space will be reduced and animal habitats destroyed if land is released from the Green Belt for development purposes. It would exasperate climate change</li> <li>• Economic forecasts incorporate an Accelerated Growth Scenario, which comes out very high. Overly high ambitions, which may not be realised, could result in unnecessary Green Belt release. This will produce a plan that is unsound.</li> <li>• Concern expressed about the potential for urban sprawl – when cities and towns begin to merge due to a lack of green space separating them - in Greater Manchester if too much land is released from the Green Belt.</li> </ul>
<b>Housing</b>
<ul style="list-style-type: none"> <li>• The revised draft GMSF would not deliver the housing and employment growth necessary to meet the ambitions of the City Region. The focus on reducing Green Belt release has been at the expense of meeting housing and employment need. For example, Trafford suffers from a shortfall in identified housing need.</li> <li>• The plan should include more affordable and social housing than is currently proposed.</li> <li>• Increasing house prices mean the character of Greater Manchester's villages is slowly diminishing as children can no longer afford to live in these areas. The aim to make Manchester a 'global city' will mean that ordinary people are priced out of their communities.</li> <li>• It is questioned why, if the aim is to balance the North and South of the region, why is there still so much development being undertaken in southern areas.</li> <li>• New development should be located in the inner city where it is much closer to employment opportunities</li> </ul>
<b>Response to Comments</b>
<p>The GMSF sets out sufficient land to meet the Local Housing Need and the Objectively Assessed Need for Employment. In order to deliver this, it supplements the existing land supply by allocating a number of strategic allocations. The GMSF timetable has been revised to take account of consultation on the Publication version of the Plan taking place in November 2020. The timetable beyond Submission to the Government has been based on best practice guidance, however it is acknowledged that the timetable for the Examination is out of Greater Manchester's control as it is run independently and therefore there may be further amendments to the timetable. However, it is considered that the plan period to 2037 retains sufficient flexibility to provide strategic guidance for local plans.</p> <p>The GMSF makes it clear that new development will be supported by the necessary infrastructure, this applies beyond the relatively limited development proposed in the strategic allocations. The GMSF is a strategic planning document,, therefore matters of road maintenance are out of its scope however, detailed transport evidence has been prepared to support the level of growth being proposed</p> <p>The level of growth being proposed has been calculated using the standard methodology for local housing need and the employment land demand paper identifies the employment land needed up to 2037. The GMSF sets out a very clear preference of using previously developed</p>

(brownfield) land and vacant buildings to meet development needs. However, given the scale of development required to meet the needs of Greater Manchester a limited amount of development is required on greenfield and Green Belt land as it is critical to the delivery of the overall vision and objectives of the plan. The release of greenfield and Green Belt land has, however been kept to a minimum with opportunities for regeneration of existing urban areas and the protection and enhancement of environmental assets being maximised where possible.

The level of growth being proposed has been calculated using the standard methodology for local housing need and the employment land demand paper identifies the employment land needed up to 2037. Further details in relation to housing need, including affordable housing can be found in the revised SHMA (2020). The overall strategy seeks to take advantage of the opportunities for delivering high levels of economic growth, whilst addressing the challenges for securing genuinely inclusive growth and prosperity. To deliver this, the spatial strategy seeks to boost the competitiveness of the northern parts of Greater Manchester, whilst ensuring that the southern areas continue to make a considerable contribution to growth by making the most of key assets. This is complemented by significant levels of growth in the existing Core Growth and Inner Areas.

### 3.1.2. Our Vision

There were 1,465 comments in relation to the plans vision and strategic objectives. This section sets out the vision for the GMSF and the strategic objectives underpinning it. The objectives set out are:

- Objective 1: Meeting our housing need.
- Objective 2: Creating neighbourhoods of choice.
- Objective 3: Ensure a thriving and productive economy in all parts of Greater Manchester
- Objective 4: Maximise the potential arising from our national and international assets
- Objective 5: Reduce inequalities and improve prosperity
- Objective 6: Promote the sustainable movement of people, goods and information.
- Objective 7: Ensure that Greater Manchester is a more resilient and carbon neutral city region.
- Objective 8: Improve the quality of our natural environment and green space.
- Objective 9: Ensure access to physical and social infrastructure.

More detailed comments in relation to specific elements of the policies are set out below

<b>Our Vision</b>
<ul style="list-style-type: none"> <li>• The vision of the GMSF does not reflect the ambition that Greater Manchester should be demonstrating. The vision should make clear that GM would need to continue to drive economic growth for the region and the Northern Powerhouse as well as to achieve its aim of delivering a top global city. Concerned that the levels of growth proposed will not provide the opportunity to provide people with a decent home, especially those in need of an affordable house.</li> <li>• The vision needs to encourage the use of sustainable transport modes, rather than referencing ‘stress free journeys’, as transport cuts across many other key issues of improving health, well-being, air quality and access to employment.</li> <li>• The GMSF fails to recognise or acknowledge the conservation and enhancement of the historic environment as part of the vision and strategic objectives.</li> <li>• Overall, strategic vision is positive and the role that walking and cycling can play in delivering on this vision should not be underestimated. Important that principles that address climate change, clean air and access for all social groups are taken into account throughout policies in the inner and outer areas.</li> <li>• Agree with the vision however, the area identified on Figure 3.1 to ‘Sustain Southern Competitiveness’ should extend further south to incorporate the strategic location at the Airport, which it currently largely omits.</li> </ul>
<b>Objective 1: Meet our housing need.</b>
<ul style="list-style-type: none"> <li>• Should not be met if it requires land to be released from the Green Belt for development.</li> <li>• The intention set out of developing a Greater Manchester definition of affordable housing should look to encompass the latent aspirations across the area for home ownership, hampered in large part by the inability to save for a mortgage deposit. The CA should look to involve locally active Housing Associations and other providers of affordable housing in discussions of how this definition should be developed.</li> <li>• Agree that the definition of affordable housing should not include market starter homes.</li> <li>• ‘Right to Buy’ should be restricted in areas of acute affordable housing shortage.</li> </ul>

- It is insufficient for the GMSF to simply seek to ‘increase net additional dwellings’ and to ‘increase the number of affordable homes’ which is an objective achieved by the net delivery of one affordable house. It is clear what is intended by the GMCA’s objective to ‘Develop a Greater Manchester definition for affordable housing’. It is not understood how or why the GMCA is proposing an alternative approach or what that approach might entail.
- It should state, “GMSF will provide a sufficient amount and variety of homes to meet the objectively assessed needs of GM”. It is not appropriate for GM to create its own definition of affordable housing. The definition in the National Planning Policy Framework is clear and appropriate.

**Objective 2: Create neighbourhoods of choice.**

- Should be added that ‘subject to maintaining a five year supply, sites that best meet the brownfield and other strategic objectives of this plan shall be released for development first’, and (ii) state that all places should have nearby accessible good quality green space
- Do not support the introduction of a sequential assessment, which requires all brownfield sites to come forward ahead of greenfield as this would not be in accordance with national policy.
- The development of brownfield sites as a priority or focus (particularly where there is any implied sequential approach) will not deliver neighbourhoods of choice. Within the Core Growth Area and town centres, it will inevitably lead to a concentration of high-density flatted development, which will not lead to balanced neighbourhoods of choice. It will be vital that the GMSF releases greenfield sites in areas capable of delivering larger family housing and areas of choice for those that do not aspire to town centre living.
- Prioritise the use of Brownfield should be reworded to “Make as much use as possible of brownfield land”. Both brownfield and greenfield land will need to come forward in a coordinated way. ‘Focus new homes in the Core Growth Area and Town Centres’ should be reworded to recognise the desire of people to live in areas other than the Core Growth Area and Town Centres. There is too much over reliance on delivery in the Core Growth Area.

**Objective 3: Ensure a thriving and productive economy in all parts of Greater Manchester.**

- Not sure that the food and drink sector should be classified as a high value cluster.
- Key to achieving that aim will be providing a quantity and quality of housing that will enable that economic growth and attract a highly skilled and high valued labour force. Whilst noting the GMSF’s desire to shift housing to the north of GM, that development should not be to the detriment of locations where the housing market is at its strongest.
- Excessive development would be at a cost to local identity, heritage and culture.

**Objective 4: Maximise the potential arising from our national and international assets.**

- Supportive of this objective, specifically the point ‘enhance our cultural, heritage and educational assets’ – but believe it should be expanded to include a reference to natural heritage assets within and around Greater Manchester.
- Object to any further development around Manchester Airport.
- Should also refer to connections to Port Liverpool including the Manchester Ship Canal.
- Do not see how the concentration of growth in the Core Growth Area and the Airport is consistent with the need to regenerate the post-industrial wastelands of the North West, North and North Eastern horseshoe. Would rather see a focus on self-sufficient districts

<p>within the conurbation in terms of more people's housing, employment, shopping and amenity needs being met in the local area.</p>
<p><b>Objective 5: Reduce inequalities and improve prosperity</b></p>
<ul style="list-style-type: none"> <li>• Everyone should have easy access to quality green space.</li> <li>• The provision of sufficient social and other affordable housing is surely also key to this objective.</li> <li>• Housing alone will not achieve these objectives – there needs to be a holistic approach to reducing inequality that links education, healthcare, employment opportunities and significant investment to drive an outcome rather than silo investment.</li> </ul>
<p><b>Objective 6: Promote the sustainable movement of people, goods and information.</b></p>
<ul style="list-style-type: none"> <li>• It is important to highlight sustainable travel modes in facilitating GMSF growth. Where transport network enhancements and improvements are referred to, it is important that significant focus be placed on the road network, including potential enhancements or improvements to the Strategic Road Network.</li> <li>• Opportunities for a modal shift to rail for both passenger and freight must be secured.</li> <li>• We need a transport body similar to TfL with similar regulated pricing and an Oyster card-like system. The goal should be to become like Hong Kong where it is easier to use public transport than to drive which would help drive down carbon emissions.</li> <li>• Public transport in Greater Manchester is not reliable enough to displace car usage.</li> <li>• It is crucial that walking and cycling continues to be embedded into the city-region. The Mayor should introduce specific targets rather than aspirations for walking and cycling.</li> </ul>
<p><b>Objective 7: Ensure that Greater Manchester is a more resilient and carbon neutral city-region.</b></p>
<ul style="list-style-type: none"> <li>• Should promote only carbon neutral new development by 2028, together with clean air and a reduction in car dependency. Suggest that a clearer definition of 'carbon neutral' is required.</li> <li>• Strongly agree with objective of securing development within 800m of sustainable transport modes.</li> <li>• It is not clear what evidence the GMSF has to suggest that carbon neutrality of new development can be achieved by 2028. It is inappropriate for the GMSF to seek to supersede or overstep the requirements of Building Regulations, which control building standards.</li> <li>• Achieving carbon neutrality may have implications for development potential.</li> <li>• In the recent budget statement, Government returned to a commitment to make all homes carbon neutral, and to make sure there is no gas going to houses after 2025. The UK has just failed to reach 16 of 19 climate change targets, so it is irresponsible to set a date of 2028. The plan should also address retrofitting existing building to low or neutral carbon standards.</li> </ul>
<p><b>Objective 8: Improve the quality of our natural environment and access to green spaces.</b></p>
<ul style="list-style-type: none"> <li>• There should be reference to the access to specific countryside areas within the city-region.</li> <li>• Welcome the improved access to the natural environment, however the increasing popularity of Dunham Park is causing traffic congestion and parking issues. Future development should address this by increasing public transport and considering park and ride schemes.</li> <li>• The proposed development of new homes would only worsen the quality of the natural environment.</li> <li>• Would like to see a specific commitment to greening and biodiversity net gain as standard within new urban development.</li> </ul>

- Aims to reduce flood risk not met by the number of proposed allocations, which would reduce flood plains and green space and lessen the flood resilience of the Pennine villages in Rochdale.

**Objective 9: Ensure access to physical and social infrastructure.**

- Proposals to add housing would add significant pressure to the already stretched transport, schools and healthcare services across the city-region, which would contradict this strategic objective.
- There seems to be no mention of green infrastructure.
- Whilst there is recognition, in this objective, that social infrastructure is important; this must include informal inside and outside meeting places. All neighbourhoods need social space and most do not have it.
- Would welcome additional wording to ensure that our communities and businesses are supported by infrastructure that is resilient to future climate change impact.

**Response to comments**

Our Vision

The GMSF Vision replicates that of the Greater Manchester Strategy as the GMSF represents one of the tools at Greater Manchester’s disposal to achieve its overall ambition. The ambitions set out in the Vision are reflected in the varied policies of the GMSF. The Key Diagram is an indicative/illustrative expression of the spatial strategy, therefore it is not necessary or appropriate for all parts of the northern or southern areas to be covered by the relevant shading.

Objective 1

The level of growth being proposed has been calculated using the standard methodology for local housing need. The GMSF sets out a very clear preference of using previously developed (brownfield) land and vacant buildings to meet development needs. However, given the scale of development required to meet the needs of Greater Manchester a limited amount of development is required on greenfield and Green Belt land as it is critical to the delivery of the overall vision and objectives of the plan. The release of greenfield and Green Belt land has, however been kept to a minimum with opportunities for regeneration of existing urban areas being maximised where possible. The planning system will not be the only way that affordable housing will be delivered, therefore Greater Manchester’s approach to tackling the housing crisis is set out in the GM Housing Strategy

Objective 2

The GMSF sets out a very clear preference for using previously developed (brownfield) land and vacant buildings to meet development needs. Other than in relation to the site selection process for identifying the strategic allocations, this is not a sequentially preferable priority. Instead the preference for using brownfield land ensures that efficient use can be of the land supply and to keep the release of greenfield and Green Belt land to a minimum

Objective 3

The prime sectors identified in the GMSF to support economic growth are: Advanced manufacturing; digital and cyber; health innovation; low carbon goods and services; business, financial and professional services and; logistics. Across Greater Manchester a wide variety of sites have been identified to meet the housing needs up to 2037 offering the opportunity for a mix of size and type of dwelling

Objective 4

Through maximising the potential from our national and international assets Greater Manchester will be able to increase the future prosperity of its residents. The overall strategy does not preclude development in the south. It seeks to boost the northern competitiveness

whilst sustaining the competitiveness of the South and Manchester Airport is an important asset. The Prosperous GM Chapter sets out in more detail the key growth locations which will enable GM to maximise the benefits of these assets, the list in Objective 4 is not designed to be exhaustive

#### Objective 5

Access to green space is addressed through Objective 8 and will be delivered through a number of policies within the GMSF, particularly those within Greener GM. Affordable housing is addressed through Objective 1. As with others, the delivery of this Objective will not be through housing delivery alone, the GMSF provides a comprehensive suite of policies which are designed to meet these overall Objectives

#### Objective 6

Our Network Chapter and the 2040 Transport Strategy set out the details of how we will achieve this objective. In particular proposals for major improvements to public transport, walking and cycling facilities across Greater Manchester together with options for integrated ticketing, reform of the bus market and whole route upgrades

#### Objective 7

Further evidence has been prepared in relation to Greater Manchester's carbon neutral targets and our pathway to achieve these. The Sustainable and Resilience Chapter sets out specific policies to enable this Objective to be met

#### Objective 8

This is a high-level strategic objective to frame Greater Manchester's approach to the natural environment and greenspaces and therefore it would not be appropriate to include the level of detail suggested. Greener GM identifies policies to protect and enhance green infrastructure, including seeking the net enhancement of biodiversity resources. Site specific concerns are addressed elsewhere and/or would be considered as part of future planning application

#### Objective 9

Policies within the plan make it clear that development will need to be supported by the necessary infrastructure, including physical and social infrastructure. IN particular policies within Greener GM and GM for Everyone. These policies will help to ensure that this objective is met. Resilience to climate change is addressed in both Objectives 2 and 7 therefore it is not necessary to include within this objective. Additionally a detailed policy framework relating to climate change is provided in the Sustainable and Resilient Chapter

### 3.1.3. Our Strategy

There were 11,175 comments in relation to this chapter. The comments received were wide ranging and many of the issues raised are covered in more detail in other chapters.

There was general support for a strategy to drive inclusive growth and to boost economic performance in the north of the conurbation but some disagreement over whether the strategy would achieve this. Some respondents considered that growth in the north should not be at the ‘expense’ of continued growth in the south, and that the plan would not meet the needs of southern districts, whilst others felt that the south was being unfairly advantaged and that the north should have less growth.

The growth projections for both housing and employment were challenged as being too low or too high. There was support for the brownfield preference by many, however this was also strongly challenged on the grounds that it was contrary to national policy.

More detailed comments in relation to specific elements of the strategy are set out below

### Spatial Strategy: Overall

<p><b>Spatial Distribution</b></p> <ul style="list-style-type: none"> <li>• The northern parts of the City region need to catch up and should seek to achieve increased targets for employment and housing growth in this regard. However, this should not be done at the expense of the south of the city region where there is increased demand for growth.</li> <li>• Both the north and south can grow at increased levels without any genuine threat to the ambition of improving the north. Curtailing growth or reducing targets beyond those required to meet demand is unsustainable.</li> <li>• It cannot simply be assumed that demand for housing will be transferred to the opposite side of Greater Manchester (i.e. from south to north).</li> <li>• A reduced housing need figure, an increased estimate of current housing supply (and ambitious delivery and density targets for town centres in particular) has led to a lower number of allocations and a marked decrease in the amount of land to be released from the Green Belt.</li> <li>• The plan will not deliver the number of homes and employment space required over the plan period and is therefore destined to fail in turning Manchester into a top global city.</li> <li>• The strategy does not capitalise upon the growth potential which will be unlocked by Manchester Airport, HS2 and Northern Powerhouse Rail. These will connect the North West region and Greater Manchester to the rest of the UK and the world, further increasing the level of demand for employment, housing and other uses.</li> <li>• The strategy set out in the GMSF appears to ignore the fact that Greater Manchester has been almost entirely focused on high-rise, city centre development for the past two decades and that this has created a shortfall of homes due to a lack in the variety and quantum of land available.</li> <li>• Greater Manchester’s ambitions will not be met given the scale, diversification and pattern of development proposed within the Framework.</li> </ul>
<p><b>Northern Areas:</b></p> <ul style="list-style-type: none"> <li>• Despite the North Bolton Strategic Opportunity area no longer being proposed, there still remains an imperative to identify sustainable and deliverable sites in Bolton that</li> </ul>



<p>have the potential to add diversity to the housing market and support initiatives and programmes promoting economic development and job creation.</p>
<p><b>Southern Areas:</b></p> <ul style="list-style-type: none"> <li>• It is apparent that the needs of Stockport, Trafford and the City of Manchester cannot be met through the GMSF.</li> </ul>
<p><b>Manchester Airport:</b></p> <ul style="list-style-type: none"> <li>• Addressing the north/south imbalance should not preclude delivering further significant development in the sustainable and commercially-attractive locations adjacent to Manchester Airport.</li> <li>• Allow greater flexibility for future B2/B8 development proposals around the airport.</li> <li>• As the Greater Manchester boundary is tightly drawn around the airport and M56 to the west, with part of runway 2 actually within Cheshire East, it will be important to consider how land in Cheshire East can help to maximise the potential of the Airport and the HS2 station both during and beyond the plan period.</li> </ul>
<p><b>Response to Comments</b></p> <p>Spatial Distribution The GMSF sets out a comprehensive strategy to deliver inclusive growth across the whole of Greater Manchester ensuring that existing inequalities will be reduced. The plan is supported by extensive evidence to demonstrate that its objectives can be delivered.</p> <p>Northern Areas There is a wide range of sites identified within Bolton’s Strategic Housing Land Availability Assessment (SHLAA) to deliver new homes over the lifetime of the GMSF</p> <p>Southern Areas In providing a comprehensive strategy, the needs of Greater Manchester, including those of Stockport, Trafford and the City of Manchester, have been met collectively through the GMSF</p> <p>Manchester Airport Manchester Airport is one of Greater Manchester’s key assets and as such it is identified as a key growth location in the GMSF. Greater Manchester is committed to working with our neighbours in relation to our growth ambitions in the vicinity of Manchester Airport.</p>

**GM-Strat 1: Core Growth Area**

<b>Infrastructure</b>
<ul style="list-style-type: none"> <li>• The public transport network will need to be overhauled if people are to stop using vehicles.</li> <li>• There needs to be a complete rethink of the main routes into Manchester. The M602 ends at Trafford Road in Salford leading to severe congestion. The A580 East Lancs Road ends at Salford University and then into Chapel Street with one lane available at best which causes congestion. These are just two examples of access to the City Centre being poor.</li> <li>• The Manchester Ship Canal has the potential to be a major link to Trafford Park and The Quays. Abandoned commercial sites along its course would be better utilized than proposed sites on already congested roads.</li> <li>• The transport infrastructure needs to be put in place before the construction on the proposed development proceeds.</li> <li>• Focusing growth at the Core Growth Area will help maximize accessibility of jobs and it is hoped that the access will be supported by more sustainable public transport modes. People will drive their cars rather than using public transport, cycling or walking and this should be discouraged.</li> </ul>
<b>Economy</b>
<ul style="list-style-type: none"> <li>• There needs to be social mobility and further job creation.</li> <li>• Trafford Park has been lacking investment and development for decades. Media City also has the potential for further growth. Port Salford is more problematic as it straddles an already congested road. Although it offers job opportunities, its proposed size threatens to dwarf the small and relatively isolated communities of Irlam and Cadishead.</li> <li>• Growth areas should be located out of the city to spread prosperity to other areas. Otherwise, Manchester will become like London with only the very rich or poor able to live there and support workers forced into commuting from dormitory towns on the outskirts, which will add to congestion.</li> <li>• Manchester City Centre and the South receives more investment than the North. Concerned that the bulk of investment will continue to be directed there.</li> <li>• There should be more emphasis on promoting growth in town centres such as Bury, Rochdale and Oldham.</li> <li>• Whilst Trafford Park does have huge employment potential, shouldn't other areas be considered to make it equal? For example, Manchester Airport would increase international competitiveness and help spread where people live to relieve pressure on the existing high demand on infrastructure in Trafford.</li> </ul>
<b>Housing</b>
<ul style="list-style-type: none"> <li>• Would like to see a stronger emphasis on affordable housing, since evidence from other cities suggests that unless this is actively planned in, lower-paid workers end up being priced out of the areas where they need to work. The concept of inclusive growth should incorporate the notion of 'rights to the city'.</li> <li>• Supportive of development and focussing the growth of housing in the proposed core areas, but this approach must not be to the exclusion of investment that supports the growth of jobs, training and enterprise outside of the core areas</li> </ul>

## **Response to Comments**

### Infrastructure

Focusing a significant amount of growth in the centre and around Greater Manchester's assets will enable maximum access to jobs and services however it is acknowledged that there needs to be an infrastructure programme to support the needs of the existing and new communities and this will be delivered alongside the GMSF

### Economy

The economic strategy within the GMSF seeks to deliver inclusive growth by not only capitalising on Greater Manchester's existing assets but also by identifying significant opportunities in the north of conurbation.

### Housing

The GMSF provides a comprehensive strategy to deliver homes in sustainably communities which meet the needs of Greater Manchester including aiming to deliver at least 50,000 affordable homes by 2037 and ensuring that new development is supported by the necessary infrastructure

**GM-Strat 2: City Centre**

<b>Principle of development</b>
<ul style="list-style-type: none"> <li>• The policy is not bold enough; it needs a stronger vision.</li> <li>• Suggestion that the city centre is too small.</li> <li>• Concerns expressed that too many flats being built and the approach fails to improve people's quality of life</li> <li>• Concerns expressed about the loss of character in the city centre as a result of new development.</li> <li>• Support expressed as it continues on the successful regeneration of the city centre since the 1996 bomb.</li> <li>• Caution urged that new development, whilst supported, needs to avoid compromising areas such as the Gay Village and Northern Quarter.</li> <li>• Suggested that the approach needs stronger regard to accommodating leisure space and nightlife.</li> <li>• Need to balance development in city centre with opportunities in surrounding local authority areas – risk of underutilised office accommodation, especially as technological change reduces the human admin workforce.</li> </ul>
<b>Housing</b>
<ul style="list-style-type: none"> <li>• Concern that apartments in the city centre are left vacant for months due to the high prices (viewed as investment vehicles without an incentive to seek occupation).</li> <li>• A proportion of new homes should be for social rent.</li> <li>• Questions raised as to whether the proposals will actually be delivered.</li> <li>• The housing in the city centre needs to move away from just young couples to make a diverse population.</li> </ul>
<b>Employment and Economy</b>
<ul style="list-style-type: none"> <li>• General concern that jobs being created could be based on “gig economy/ zero hours” culture. We need to provide people the skills, education and experience for a decent future to allow them to contribute to the local economy and their community neighbourhoods not just an easy come easy go option.</li> <li>• Need new commercial estates for small/medium size business offering warehouse/office units 2000sq/ft+ to encourage entrepreneurship.</li> </ul>
<b>Green Belt</b>
<ul style="list-style-type: none"> <li>• Comments linked to support for brownfield development to reduce/prevent development in the Green Belt .</li> </ul>
<b>Brownfield</b>
<ul style="list-style-type: none"> <li>• Support for brownfield development as a priority over greenfield/ Green Belt sites.</li> </ul>
<b>Transport – Highways / Public Transport / Cycling / Walking</b>
<ul style="list-style-type: none"> <li>• Identified that transport improvements (particularly public transport, but also roads) needed to support growth.</li> <li>• Some support expressed for the Metrolink tunnel idea.</li> <li>• Suggestions made to build a Metrolink line up the Oxford Road corridor, as far as Whitworth Park.</li> <li>• Concerns expressed that public transport into the city centre is too expensive.</li> <li>• Suggested that the ring roads need burying or raising so they don't form such a barrier to people going into the city centre.</li> <li>• Identified a need for increasing provision for cycling in the city centre.</li> <li>• Visitors who through necessity have to travel by car find it almost impossible to navigate through the city centre.</li> <li>• Metrolink bottleneck in the city centre; problems here impact the whole network</li> <li>• Some scepticism raised that HS2 will be delivered.</li> </ul>

<b>Social Infrastructure</b>
<ul style="list-style-type: none"> <li>• Concern that there is little/no provision for schools in the city centre for all the people who live there.</li> <li>• The social infrastructure also needs to be thought through for schools, doctors and dentists.</li> </ul>
<b>Environmental – Green Infrastructure, Biodiversity, open space</b>
<ul style="list-style-type: none"> <li>• Improvements in the public realm, walking and cycling facilities, and green infrastructure will help to enhance the environmental quality of the City Centre.</li> <li>• Suggested that the city centre needs many more green spaces.</li> <li>• The City Centre approach from Piccadilly for business or tourists is wholly unpleasant.</li> </ul>
<b>Air Quality</b>
<ul style="list-style-type: none"> <li>• Concerns expressed about air pollution in the city centre.</li> <li>• Air pollution needs to be addressed with dedicated green spaces in the city centre.</li> </ul>
<b>Heritage</b>
<ul style="list-style-type: none"> <li>• The city is losing its identity, buildings with history and character are being sacrificed for boring concrete towers.</li> </ul>
<b>Other</b>
<ul style="list-style-type: none"> <li>• Concerns expressed about levels of crime; homelessness; and drug use in the city centre</li> <li>• Suggested that the city centre is being gentrified.</li> </ul>
<b>Response to comments</b>
<p>Principle of development At the heart of the GMSF strategy is maintaining and strengthening the city centre's role as the most significant economic location in the country outside of London. Significant levels of growth are therefore proposed in this location, including expanding its residential offer. However, current uses (including its heritage and cultural assets) will be maintained and protected. To help to ensure maximum benefits are achieved from the growth in the City Centre, significant improvements to public transport is also proposed.</p> <p>Housing The City Centre offers significant opportunity to maximise the use of previously developed land. It will enable the delivery of a range of types of homes so that people can live close to a major source of jobs, education and amenities, reducing the need to travel. As a whole the GMSF aims to deliver at least 50,000 affordable homes by 2037, however, the specific requirements for local areas will be set by the relevant local planning authority</p> <p>Employment and Economy The City Centre has significant development potential and will be the largest source of new jobs over the next few decades. The GMSF seeks to ensure that the opportunities offered by the City Centre will be accessible to Greater Manchester's residents, including through access to the right types of training and improvements to public transport</p> <p>Green Belt Promoting the City Centre as a one of Greater Manchester's growth areas offers significant opportunity to maximise the use of previously developed land and to minimise the use of greenfield and Green Belt land for development in the GMSF</p> <p>Brownfield Support noted</p> <p>Transport – Highways / Public Transport / Cycling / Walking</p>

The GMSF seeks to significantly reduce the need to travel by private car and as such is supported by a comprehensive package to improve transport facilities across Greater Manchester including specific proposals within the City Centre. These include improvements in the public realm and walking and cycling facilities across the City Centre and addressing the current network capacity issues across the City Centre which will enable the future expansion of the rapid transit public transport network across Greater Manchester. HS2 is a national infrastructure project, however its anticipated completion towards the end of the plan period will dramatically reduce journey times to London, Birmingham and other cities in the North and will therefore further enhance the attractiveness and potential of the City Centre

#### Social Infrastructure

The GMSF clearly states that new development will be supported by the necessary infrastructure, including where appropriate schools and medical facilities

#### Environmental – Green Infrastructure, Biodiversity, open space

New development in City Centre will be supported by improvements to the public realm; walking and cycling facilities and; green infrastructure which will help to enhance the local character and environmental quality

#### Air Quality

Greater Manchester is introducing a comprehensive range of measures to support improvements to air quality and development within the City Centre will be supported by appropriate improvements to Green Infrastructure.

#### Heritage

The new functions in the City Centre will be delivered in a way that seeks to protect and enhance the City Centre's historic environment and assets.

#### Other

The new functions in the City Centre will be delivered in a way that seeks to complement existing uses and the proposed improvements to the public realm and green infrastructure will help to enhance the local character and environmental quality

**GM-Strat 3: The Quays**

<b>Principle / scale of development</b>
<ul style="list-style-type: none"> <li>• The area is of international importance – the first sentence of the policy should also make reference to The Quays being a main town centre</li> <li>• General support for continued development of the area for a mix of uses</li> <li>• Integral part of Greater Manchester and links Salford and Trafford to Manchester</li> <li>• The ambitions for The Quays and the City Centre appear too similar and should instead be distinctive places (The Quays should be focussed on arts and media), whilst others commented that The Quays and the City Centre actually complement each other</li> <li>• Development should be accommodated elsewhere in Greater Manchester, in places such as Wigan in order to boost northern competitiveness</li> </ul>
<b>Housing (inc affordable housing)</b>
<ul style="list-style-type: none"> <li>• Dwellings in the area are not affordable, and are mainly high rise flats that do not have gardens for children</li> <li>• Concern that homes are being bought as investments and then sub-let, including for short term lets</li> <li>• Need to be clear whether the 8,000 homes target for Salford Quays is within the 50,000 target for the City Centre, and fully evidence where the dwellings at The Quays will be located</li> </ul>
<b>Employment and Economy</b>
<ul style="list-style-type: none"> <li>• MediaCityUK is an important economic asset which has significant economic potential</li> <li>• Question whether additional office floorspace is needed given there are vacant office buildings and offices being converted to residential uses at The Quays, whilst the job market is also changing with more people working at home</li> <li>• Concerns about the accessibility of jobs for local people, the need for greater links to training opportunities, opportunities for small and community-led businesses, and jobs usually being low paid / zero hours contracts</li> <li>• Housing should not be the sole focus of development</li> <li>• There is a need for some manufacturing and warehousing floorspace at The Quays, as well as a focus on finance and IT</li> </ul>
<b>Green Belt</b>
<ul style="list-style-type: none"> <li>• Good example of brownfield development as an alternative to Green Belt proposals</li> </ul>
<b>Brownfield</b>
<ul style="list-style-type: none"> <li>• Good example of brownfield development</li> </ul>
<b>Transport – Highways / Public Transport / Cycling / Walking</b>
<ul style="list-style-type: none"> <li>• Poor infrastructure / need better transport links</li> <li>• Public transport, cycling and walking should be prioritised; although the area is well served by the Metrolink it is however overcrowded, slow and expensive</li> <li>• Need to make better use of waterways, and be clearer about the sustainable transport proposals for the area</li> <li>• Without better transport links from northern areas, the focus on investment in the Quays, City centre and Core Growth Area will self-perpetuate the economic imbalance and deprivation of the Northern Districts</li> <li>• The Quays is within close proximity to the M602 corridor and there is potential for the proposed development to impact the strategic route network</li> </ul>
<b>Social Infrastructure</b>
<ul style="list-style-type: none"> <li>• Concerns about the retail and leisure offer in the area, including vacancies in the outlet mall</li> </ul>

<b>Environmental – Green Infrastructure, Biodiversity, open space</b>
<ul style="list-style-type: none"> <li>• Potential harm to the role of Salford Quays as a habitat, including birds</li> <li>• Lack of greenspaces and trees; any developments should be required to provide greenspaces which includes consideration of maintenance</li> <li>• Greenspaces should be made available along the waterfront, rather than developed for office buildings and apartments</li> <li>• Rubbish in the waterways needs addressing</li> <li>• The Quays is within an opportunity area for heat/energy networks; this should be referenced within the policy</li> </ul>
<b>Air Quality</b>
<ul style="list-style-type: none"> <li>• Development will worsen existing issues of poor air quality</li> </ul>
<b>Flood risk</b>
<ul style="list-style-type: none"> <li>• Flood risk in the area should be assessed</li> <li>• A large area of the location is within flood zone 2; it is essential that the policy reflects the need to ensure that high quality design is resilient to future climate change impacts</li> </ul>
<b>Other</b>
<ul style="list-style-type: none"> <li>• Poor urban environment quality; concern over poor design in the area, density of development and tall buildings, urban sprawl, and loss of character</li> <li>• Compared to other major international cities the Quays cannot be considered as a major tourist destination</li> </ul>
<b>Responses to Comments</b>
<p>Principle / scale of development</p> <ul style="list-style-type: none"> <li>• Policy GM-Strat 12 of the Publication GMSF identifies that a new town centre is proposed for designation at Salford Quays in the Publication Draft Salford Local Plan: Development Management Policies and Designations.</li> <li>• General support for a mix of uses at the Quays is noted.</li> <li>• The Quays and the City Centre share many of the same attributes and so form part of the Core Growth area. The Quays policy refers to its leisure and tourism role, whilst it is clear that “The development of MediaCityUK over the last decade has helped to establish an internationally significant cluster of digital and media uses, including the BBC and ITV”.</li> <li>• Boosting northern competitiveness is covered within policy GM-Strat 6. High levels of development at places like the Quays are complementary to this and the overall GMSF strategy.</li> </ul> <p>Housing (including affordable housing)</p> <ul style="list-style-type: none"> <li>• The GMSF sets out the overall minimum number of dwellings that should be affordable across Greater Manchester (50,000). Salford’s local plan considers the requirements for affordable housing in more detail (policy H4).</li> <li>• Given the characteristics of the Quays it is accepted that the vast majority of new development will be in the form of high density apartments. However, ground floor duplexes with some outdoor private amenity space would be encouraged.</li> <li>• Policy in Salford’s Publication Local Plan deals with the issues of short term lets (policy H10).</li> <li>• In line with the Diagram showing the Core Growth area the target for dwellings in Salford Quays is separate to that for the City Centre. The location of all dwellings that are</li> </ul>



assumed to be built across all of GM can be found through the housing land availability data at MappingGM.

#### Employment and Economy

- Importance of MediaCityUK is noted.
- Although there has been more home working over recent years, and particularly currently due to the Covid-19 pandemic, there is insufficient evidence to suggest that there is no longer any additional need for office space particularly given a growing population and workforce.
- There are a range of job types at The Quays which are accessible to a wide range of people. The GMSF seeks to ensure that the jobs at The Quays will be accessible through improved training opportunities and improved transport links including links to key rail stations and the City Centre.
- As noted in the policy, The Quays will continue to develop as an economic location of national significance, characterised by a wide mix of uses.
- It is not considered that The Quays will be developed for new manufacturing and warehousing space as this would be an inefficient use of space in this particularly accessible location. There are however such opportunities in areas close to the Quays (such as at Trafford Park).

#### Green Belt

- Comments noted relating to the Quays being a good example of brownfield development as an alternative to Green Belt proposals.

#### Brownfield

- Comments noted relating to the Quays being a good example of brownfield development.

#### Transport – Highways / Public Transport / Cycling / Walking

- The policy is clear that major improvements in accessibility by public transport, cycling and walking will be sought, including much better links to key rail stations and greater connectivity with the City Centre.
- Other policies within the plan seek to promote public transport, cycling and walking.
- There is the potential for a new Metrolink line connecting Salford Quays and Salford Crescent Station, improving sustainable transport access to Salford Quays and its integration with the City Centre and the rail network.
- Policy GM-G 3 states that in making planning decisions, regards will be had to increasing the use of canals and waterways for active travel.
- High levels of development at places like the Quays are complementary to increasing the competitiveness of the Northern Districts and are at the heart of the overall strategy in the GMSF.
- Any impact of proposals on the SRN will be considered as part of the planning application process, and through strategic modelling.

#### Social Infrastructure

- As noted in the policy, The Quays will continue to develop as an economic location of national significance, characterised by a wide mix of uses, including retail.

#### Environmental – Green Infrastructure, Biodiversity, open space

- The policy is clear that the high environmental quality of the Quays (including its public realm, green infrastructure, wildlife sites and heritage assets) will be protected and enhanced as its essential distinguishing features, and excellent, distinctive design will continue to be a priority.
- Rubbish in the waterways falls outside of the scope of the GMSF and is managed through separate processes rather than through the planning system.

- Policy GM-S 3 sets out the overall approach to Heat and Energy Networks.

#### Air Quality

- Various policies within Greater Manchester's Transport Strategy 2040 are aimed at improving air quality across the Region. Greater Manchester is also releasing a Clean Air Plan for consultation coinciding alongside release of the GMSF. In addition, policy GM-S6 deals with clean air.

#### Flood Risk

- Any impacts of flood risk will have to be considered at the planning application stage and be consistent with policy GM-S 5.

#### Other

- Development needs to be in line with GM-E 1 (Sustainable Places). In addition, there are detailed policies on design within Salford's Local Plan.
- The Quays will continue to develop as an economic location of national significance, characterised by a wide mix of uses. Its business, housing, leisure and tourism roles will all be significantly expanded, in a mutually supportive way, reinforcing the area's interest, vibrancy and unique identity to reduce levels of unemployment and poverty in Greater Manchester's communities.

**GM Strat 4: Port Salford**

<b>Principle / scale of development</b>
<ul style="list-style-type: none"> <li>• Object to scale of the proposed development</li> <li>• Question the need of the facility with issues identified including the proximity to facilities at the Port of Liverpool</li> <li>• Support for the tri-modal facility</li> <li>• Policy should refer to the full City Gateway proposal including the City of Salford Stadium and City Airport and Heliport.</li> <li>• Site should be expanded to enable delivery of 675,000sqm in total at Port Salford</li> <li>• The development should be located in Trafford Park</li> <li>• Development should be focussed on South Manchester and not Salford</li> </ul>
<b>Housing (inc affordable housing)</b>
<ul style="list-style-type: none"> <li>• Site should be used for housing</li> <li>• Need to have housing adjacent to the proposed development</li> </ul>
<b>Employment and Economy</b>
<ul style="list-style-type: none"> <li>• Proposal will be good for economic growth and jobs, open up Manchester to international trade, boost productivity and the prosperity of the area</li> <li>• A relatively small number of people will be employed on the site due to automation and computerisation</li> <li>• Unclear whether the units will be occupied, where the businesses will come from and whether they will remain.</li> </ul>
<b>Green Belt</b>
<ul style="list-style-type: none"> <li>• Object to development of Green Belt land with reference made to the role of the former golf course in separating Irlam and Eccles and its role as a 'green lung'</li> </ul>
<b>Brownfield</b>
<ul style="list-style-type: none"> <li>• Reference to derelict land along the ship canal as an alternative to Green Belt development</li> </ul>
<b>Transport – Highways / Public Transport / Cycling / Walking</b>
<ul style="list-style-type: none"> <li>• Site benefits from good transport links</li> <li>• Support for the proposal including the use of rail and water to move freight</li> <li>• Question the demand for canal traffic, with reference made to most freight in the UK being transported by road and the site's proximity to the facilities at the Port of Liverpool</li> <li>• Questions around the capacity of the Ship Canal to support the development with reference made to the size of boats and the implications of unloading/reloading onto smaller ships at Liverpool</li> <li>• Concerns that users may not rely equally on road water and rail based modes. Suggestion that the policy should support equal shares and limit volume of HGV movements to ensure it really is a tri-modal facility</li> <li>• Unclear when key infrastructure associated with the permitted Port Salford will be delivered</li> <li>• There should be an independent investigation into the provision of infrastructure to support the scheme</li> <li>• Proposal will exacerbate existing traffic problems / congestion on the local and strategic road network</li> <li>• Proposal will reduce congestion / traffic on roads</li> <li>• Highway improvements must be part of any scheme</li> <li>• Road infrastructure should be in place before the port is operational</li> </ul>

<ul style="list-style-type: none"> <li>• An M62/A57 link will only allow more vehicles into the area worsening existing problems</li> <li>• The delivery of highway improvements cannot be funded entirely by Port Salford. Collaboration is required to unlock the potential of the site whilst addressing existing congestion in the local area.</li> <li>• There should be a new road bridge from Partington to Irlam</li> <li>• Little mention of public transport access for employees</li> <li>• Road safety issues associated with HGVs</li> <li>• Support for a potential new station but more details needed, including in respect of services</li> <li>• Should provide a rail link from the Port to Manchester airport</li> <li>• Question whether the proposal will be future proofed for HS3</li> <li>• Welcome a Metrolink extension to the area</li> <li>• Barton aerodrome should become an air freight facility and provide short domestic flights to alleviate pressure at Manchester Airport</li> <li>• Support the protection of the aerodrome for aviation purposes only</li> <li>• A need to provide decent paths and rights of way</li> <li>• There should be more of a focus on cycles and should be links between Trafford Park and Peel Green before road freight capacity is increased</li> <li>• More information is required about the impact on the Ship Canal</li> <li>• Concerns relating to increased ship movements and lower level canal crossings towards Liverpool, particularly in Warrington</li> </ul>
<p><b>Social Infrastructure</b></p>
<ul style="list-style-type: none"> <li>• Question the provision of community facilities such as schools, doctors and dentists.</li> </ul>
<p><b>Environmental – Green Infrastructure, Biodiversity, open space</b></p>
<ul style="list-style-type: none"> <li>• Concerns relating to loss of agricultural land and loss of peat, habitats and wildlife including protected species</li> <li>• Green space in/at urban edges should be retained</li> <li>• The impact of the development on green space is minimal</li> <li>• Proposal is part of the inevitable creep into the countryside post 2037</li> <li>• Need for blue and green infrastructure along the canal</li> <li>• Policy does not reference environmental considerations</li> </ul>
<p><b>Air Quality</b></p>
<ul style="list-style-type: none"> <li>• Use of ship canal has potential to result in less vehicle movements and help improve air quality.</li> <li>• Development will have a negative impact on air quality including through increased traffic and rail.</li> <li>• Ships tend to have particularly poor emissions conflicting with the GM Clean Air Plan</li> <li>• Reference should be made to omitting carbon emissions</li> </ul>
<p><b>Other</b></p>
<ul style="list-style-type: none"> <li>• Will result in noise and light pollution</li> </ul>
<p><b>Responses to Comments</b></p> <p>Principle / scale of development</p> <ul style="list-style-type: none"> <li>• The scale of development responds to the tri-modal opportunities that the site will benefit from (it will be the UK's first tri-modal inland waterway port located on the unique Manchester Ship Canal). It reflects floorspace with planning permission and also floorspace proposed for allocation in the GMSF that is currently in the Green Belt.</li> <li>• Port Salford will be supported by sustainable transport which will ensure that the economic growth at this location is accessible to a wide range of residents and will reduce poverty in Greater Manchester.</li> </ul>

- City of Salford Stadium (AJ Bell) and City Airport and Heliport are not part of Port Salford proposals and it is not considered to be appropriate to widen the area to also include these leisure uses.
- Expansion to 670,000sqm is not supported. The land between the proposed site allocation and Irlam which is currently designated as Green Belt (and which would accommodate any additional floorspace) is proposed to be retained as Green Belt in the GMSF.
- It is noted that there are some opportunities for employment development within places like Trafford Park. However, Port Salford will take advantage of new port facilities, rail link and highway improvements. This will provide one of the most well-connected and market-attractive industrial and warehousing locations in the country.

#### Housing (including affordable housing)

- Developing the land for housing would not make best use of the tri-modal linkages the Port Salford location benefits from. Sufficient land for new homes has been identified elsewhere across Greater Manchester.
- The land between the proposed site allocation and Irlam which is currently designated as Green Belt is proposed to be retained as Green Belt in the GMSF and is not considered appropriate for new housing. Equally residential development as part of a mixed use scheme has potential to create amenity issues for prospective residents.

#### Employment and Economy

- Comments noted with regards to Port Salford being good for economic growth.
- Job densities relating to the logistics sector are generally lower than other traditional employment sectors. The sector is an important part of a functioning economy and this site provides a particular opportunity in this regard given its proximity to the tri-modal connections to be delivered to the south of the A57. A diverse economy is considered to be important in respect of the positive contribution it can make to economic inclusion and economic resilience objectives.
- Occupation of the units will be demand-led and so at this stage there is no certainty as to where the businesses will come from. However, given the nature of the development it is likely to be attractive to new and existing business drawn from a wide area.

#### Green Belt

- The need to deliver the long-term positive outcomes of the Greater Manchester Strategy is considered to amount to exceptional circumstances which justify altering the boundaries of the Green Belt. The case for exceptional circumstances is explained further in the Green Belt topic paper. Tri-modal facilities at Port Salford will support a more sustainable logistics sector, and enabling its expansion will help to significantly boost the competitiveness of Greater Manchester.
- Port Salford and its tri-modal connections have been identified as a strategic opportunity for Greater Manchester and it is therefore appropriate to consider its allocation through the GMSF in order to provide greater certainty around its deliverability.
- An assessment of Green Belt harm resulting from the release of GMSF allocations has been undertaken. It is identified that the release of this allocation would cause 'moderate' harm to Green Belt purposes and 'no/negligible' harm to adjacent Green Belt.
- The land between the proposed site allocation and Irlam which is currently designated as Green Belt is proposed to be retained as Green Belt in the GMSF.

Brownfield

- Although there may be other land along the ship canal, Port Salford in a GM context is uniquely positioned having regard to road and rail links, as well as the waterways.

Transport – Highways / Public Transport / Cycling / Walking

- The GMSF is supported by detailed transport evidence.
- Policy GM-Strat 4 requires that “The development of Port Salford must ensure that necessary transport infrastructure is delivered, including highway improvements to accommodate the likely scale of traffic generation, in a way that is compatible with proposals for the enhancement of the wider motorway network and the provision of appropriate sustainable travel opportunities to meet the needs of the employees accessing the site.”
- Part of the Port Salford area already has planning permission for employment floorspace and so transport implications were fully considered through this process.
  - With regards to the impact of the additional floorspace as a result of the allocation of land currently in the Green Belt, a transport Locality Assessment for it identifies that significant issues are forecast to be experienced at junction 11 of the M60 and subsequent junctions along the A57. Due to the uncertainty over the delivery of a new junction on the M62 and link road to the A57, this has not been tested. The assessment therefore presents a worst case scenario that assumes access is provided solely from the A57 Liverpool Road and does not reflect opportunities to secure a mode shift to active travel. This is particularly notable for this allocation where the purpose of the development is to secure a modal shift towards the sustainable movement of goods via water and rail. It is recognised that the assessment does not reflect the likely level of impact. Further work will now be undertaken in consultation with the landowner, TFGM and Highways England to assess the allocation in greater detail taking into account the unique nature of the development. The impact of a new junction on the M62 will be considered as part of this work.
  - The GMSF site allocation policy requires that the site delivers the necessary highway improvements of a local and strategic nature (criterion 5), maximises links to existing transport services, supports new routes and services, including accommodating an extension to the Trafford Park Metrolink line to serve the site (criterion 7).
  - The GMSF site allocation policy explains that the development of this site will not be commenced until the rail link, highway improvements, canal berths and container terminal associated with the permitted Port Salford scheme have been completed and are operational (criterion 3).
  - Further consideration of the transport implications of the scheme is required beyond the Locality Assessment undertaken to date. This will consider trip generation and modal shares resulting from the development.
  - The permitted Port Salford scheme to the south of the A57 will be served by a rail link and canal berths/container terminal providing new opportunities to transport freight by rail and water.
  - The tri-modal connections to be provided as part of the permitted Port Salford south of the A57 are central to the proposed extension of Port Salford. It is therefore appropriate to include policy requirements that ensure that this infrastructure is in place and operational prior to the development of the site.
  - There are currently no firm plans for a road bridge from Partington to Irlam, or a rail link from Port Salford to Manchester Airport.
  - Given the heritage assets at Barton aerodrome it is not appropriate for it to become an air freight facility that also provides short domestic flights.

#### Social Infrastructure

- The GMSF requires all new development to be supported the necessary infrastructure based on the type and scale of development.
- The Port Salford allocation will be required to make appropriate contributions to address its impacts in accordance with policy PC1 (Planning obligations) Salford Local Plan: Development Management Policies and Designations (January 2020) once it is adopted.

#### Environmental – Green Infrastructure, Biodiversity, open space

- Part of Port Salford already has planning permission for employment uses. The comments below relate to additional land currently in the Green Belt, that is proposed for allocation for employment floorspace.
- It is not considered that the site presents any significant ecological constraints, subject to appropriate mitigation measures being taken. Where considered relevant, specific issues that need to be addressed have been identified in the GMSF site allocation policy, these include criteria 11, 12, 13, 14 and 15. These matters will be considered in more detail at the masterplanning stage.
- The site will be required to deliver a minimum 10% net gain in biodiversity (criterion 11). This is in line with Environment Bill and is expected to become a national requirement.
- A limited amount of development on high grade agricultural land is proposed in the GMSF and considered necessary to meet development needs. An agricultural land survey would allow the significance of the loss to be better understood and weighed against the benefits of development.
- The allocation will incorporate high levels of landscaping, walking and cycling routes and retain key landscape features (criteria 6 and 11).
- It is understood that the golf course has now closed. The GMSF site allocation policy has been updated to require that the development justifies and provides full compensation for the loss of the golf course in accordance with the National Planning Policy Framework (criterion 10 of the allocation policy).

#### Air Quality

- Comments relating to use of ship canal having the potential to result in less vehicle movements and help improve air quality is noted.
- The Air Quality Management Area associated with the M62 motorway runs along the site's northern boundary. It is not considered that the site presents any significant air quality constraints, subject to appropriate mitigation measures being taken. These matters will be considered in more detail at the masterplanning stage and an air quality impact assessment will be required when a planning application is submitted. The majority landowner has completed a baseline air quality study which will be published for information alongside the Publication Draft GMSF.
- One of the key attributes of the allocation is its potential to move freight from the roads and move it more sustainably. The GMSF site allocation policy requires that the infrastructure associated with the permitted Port Salford scheme is completed and operational before the expansion is commenced (criterion 3). Criteria 6 and 7 of the GMSF site allocation policy also require that the development is designed to maximise the use of sustainable modes.
- The GMSF states the aim of delivering a carbon neutral Greater Manchester no later than 2038 and sets out a pathway to achieve this.
- Various policies within Greater Manchester's Transport Strategy 2040 are aimed at improving air quality across the Region. Greater Manchester is also releasing a Clean Air Plan for consultation coinciding alongside release of the GMSF.

Other

Detailed mitigation in respect of noise and light pollution is a matter of detail that would be dealt with through the preparation of the future masterplan/framework or at the future planning application stage.



## GM-Strat 5: Inner Areas

<b>Green Belt/Brownfield</b>
<ul style="list-style-type: none"> <li>• Opposition to development on Green Belt land and an indicated preference for development on Brownfield land or in inner city areas.</li> <li>• Proposals for use of existing brownfield sites.</li> <li>• Boroughs where regeneration offers an alternative to Green Belt release should be given support and encouragement to improve existing communities.</li> <li>• The bulk of additional housing should be located in the Inner Areas and not on the Green Belt.</li> <li>• Any existing Green Belt should be maintained in order to prevent urban sprawl in these locations.</li> <li>• Growth should be encouraged in the North of the conurbation to avoid loss of Green Belt land.</li> </ul>
<b>Infrastructure</b>
<ul style="list-style-type: none"> <li>• The M60 is too congested and the plan is not addressing transport infrastructure sufficiently.</li> <li>• Deprived areas need to have the necessary infrastructure including access to good schools.</li> <li>• Support the policy as it has the potential to provide a great deal of housing with less impact on transport infrastructure than commuting in from the affluent south.</li> <li>• Sustainable modes of transport should be encouraged.</li> </ul>
<b>Housing</b>
<ul style="list-style-type: none"> <li>• Concern that the housing proposed and on offer is not truly affordable and skepticism about the definition of affordable used in the plan.</li> <li>• Either high-rise developments should be halted or priority should be given to more affordable options for residents.</li> <li>• New development should be high-density affordable housing not social housing.</li> <li>• Locate housing near employment opportunities to limit pollution and to encourage the diversity of residents no matter age, income, or disability to be part of those opportunities.</li> <li>• Importance of social housing should be emphasised as it supports more vulnerable communities than affordable housing. Affordable housing is not affordable for most people.</li> </ul>
<b>Environment</b>
<ul style="list-style-type: none"> <li>• Further development and the vehicles that accompany it would negatively affect air quality. Air quality is already at dangerous levels in the city-region.</li> <li>• Importance of supporting green infrastructure emphasised.</li> <li>• Park provision emphasised. Particularly the importance of conserving heritage assets like Angel Meadow.</li> </ul>
<b>Response to comments</b>
<p>Green Belt/Brownfield</p> <p>The GMSF sets out a very clear preference of using previously developed (brownfield) land and vacant buildings to meet development needs. However, given the scale of development required to meet the needs of Greater Manchester a limited amount of development is required on greenfield and Green Belt land as it is critical to the delivery of the overall vision and objectives of the plan. The release of greenfield and Green Belt land has, however been kept to a minimum</p>

#### Infrastructure

GM Strat 5 is a high level policy, however, the GMSF ensures that new development will be supported by necessary infrastructure, including the provision of appropriate sustainable travel opportunities, schools and medical facilities to meet the needs of the communities.

#### Housing

The Inner Areas offer significant opportunity to maximise the use of previously developed land. It will enable the delivery of a range of types of homes so that people can live close to a major source of jobs, education and amenities, reducing the need to travel. As a whole the GMSF aims to deliver at least 50,000 affordable homes by 2037. The specific requirements for local areas will be set by the relevant local planning authority and it is through its Housing Strategy that Greater Manchester sets out its approach to tackle the housing crisis

#### Environment

Greater Manchester is introducing a comprehensive range of measures to support improvements to air quality. New development in the Inner Areas will be supported as necessary by improvements to green infrastructure and existing historic and environmental assets will be protected and enhanced.

## GM-Strat 6 Northern Areas

<p><b>Green Belt/Brownfield</b></p> <ul style="list-style-type: none"> <li>• Prioritise development on Brownfield land before releasing land from the Green Belt.</li> <li>• Opposition to development on Green Belt land because it would lead to pressure on physical infrastructure and pollution.</li> <li>• Concerns about the environmental impact of development and how it could affect global warming.</li> <li>• Loss of Green Belt would mean more of a ‘city centre atmosphere’ and could lead to urban sprawl.</li> <li>• Concerns about the potential impact on air quality throughout the city-region.</li> <li>• Boroughs where regeneration offers an alternative to Green Belt release should be given support and encouragement to improve existing communities.</li> </ul>
<p><b>Infrastructure</b></p> <ul style="list-style-type: none"> <li>• Transport connections are vital to encourage greater levels of commuting into town centres and the city centre.</li> <li>• The focus on Northern Areas should facilitate much needed regeneration including redevelopment, stock renewal, addressing dereliction and supporting community and transport infrastructure through partnerships and investment.</li> <li>• Employment and housing should be located along key transport infrastructure where people can easily move around using public transport, which further supports the green strategies of the GMSF.</li> <li>• Metrolink would need additional capacity to support the number of additional proposed households.</li> <li>• The M62, M61 and M60 currently fail to cope with rush hour demand.</li> </ul>
<p><b>Housing</b></p> <ul style="list-style-type: none"> <li>• Southern Areas should meet their own housing need whilst uplifting the housing and employment requirements for the Core and Northern Areas to drive economic growth and competitiveness.</li> <li>• Concern that the GMSF fails to identify enough housing land to meet the need. This in turn constrains growth in Bolton, as a sufficient housing market is required to stimulate economic growth in the borough.</li> <li>• Utilise old mills and closed down retail premises for new housing.</li> <li>• Plans for luxury and executive housing will not meet the needs for proposed jobs in the area as most of Rochdale’s industry is warehousing.</li> <li>• Pleased to see an emphasis on the potential of town centres as part of boosting northern competitiveness through housing and transport infrastructure.</li> </ul>
<p><b>Town Centres</b></p> <ul style="list-style-type: none"> <li>• Concerned about the hollowing out of existing town centres if Green Belt development is made too easy. Loss of open spaces would create vast distribution parks with poor wages, limited jobs and a lack of long-term security.</li> <li>• More easily accessible and affordable parking is needed.</li> <li>• Transport connections are vital to encourage greater levels of commuting into the town centres.</li> <li>• There should be more conversion to housing within town centres.</li> <li>• We need to not only concentrate on the development of the town centres or the main towns like Bury we need to look at the surrounding smaller towns like Radcliffe, Ramsbottom and Tottington that are forgotten about when money is allocated.</li> </ul>
<p><b>Response to comments</b></p> <p>Green Belt/Brownfield</p> <p>The GMSF sets out a very clear preference of using previously developed (brownfield) land and vacant buildings to meet development needs. However, given the scale of development</p>

required to meet the needs of Greater Manchester a limited amount of development is required on greenfield and Green Belt land as it is critical to the delivery of the overall vision and objectives of the plan. The release of greenfield and Green Belt land has, however been kept to a minimum with opportunities for regeneration of existing urban areas being maximised where possible. Greater Manchester is introducing a comprehensive range of measures to support improvements to air quality.

#### Infrastructure

The GMSF is supported by detailed transport evidence which is reflected as appropriate in the detailed allocation policies associated with this strategic growth area policy. Proposed development will be supported by necessary infrastructure including the provision of appropriate sustainable travel opportunities and highway improvements and social infrastructure such as schools and health facilities. Improving transport links across The Northern Areas will ensure that residents will be able to access opportunities across Greater Manchester and will therefore help to reduce inequalities.

#### Housing

The GMSF identifies sufficient land to meet the housing needs of Greater Manchester. The land has been identified in a way that meets the overall Vision and Objectives of the plan and will deliver a mix of housing sizes and types. The GMSF sets out a very clear preference of using previously developed (brownfield) land and vacant buildings to meet development needs. This includes the potential use of mills and buildings currently in non-residential use

#### Town Centres

The GMSF sets out a very clear preference of using previously developed (brownfield) land and vacant buildings to meet development needs. However, given the scale of development required to meet the needs of Greater Manchester a limited amount of development is required on greenfield and Green Belt land as it is critical to the delivery of the overall vision and objectives of the plan. Town centres, including those in The Northern Areas, will continue to be developed as local economic drivers and will be the focus for office, retail, leisure and cultural activity. They are complemented by a diverse collection of smaller town centres and local centres across the ten districts, each of which have an important role to play in the future growth of Greater Manchester.

**GM-Strat 7 M62 North East Corridor**

<p><b>Infrastructure</b></p> <ul style="list-style-type: none"> <li>• Transport networks such as M60 and Metrolink are already at capacity and development will just add further. They are only useable if you live and work on their routes.</li> <li>• The smart motorway has not improved traffic congestion. If these proposals go ahead, congestion in Greater Manchester will only worsen.</li> <li>• Junction 18 off the M60 has to be improved as a matter of urgency. A new junction to service the Pilsworth Industrial Estate would be an improvement.</li> <li>• The fact there are a lack of public transport routes between certain areas, for example Littleborough and Milnrow, means the vast majority of commuters will drive.</li> <li>• Any expansion in physical infrastructure will lead to higher levels of pollution, accidents, delay and congestion.</li> <li>• Scale of development proposed in the M62 North-East Corridor will inevitably lead to increased travel between Greater Manchester and Rossendale/East Lancashire, increasing congestion on the M66 in particular.</li> <li>• There are currently not enough places available at doctors, dentists and in schools. More houses will result in longer waiting times and less availability of these services.</li> <li>• Fibre-to-premises broadband would reduce the need to travel.</li> <li>• The Woodhead route to Sheffield should be used as an alternative as the M62 is currently at capacity.</li> <li>• Redevelopment of existing Heywood Industrial Park would create a world class distribution centre. Completing the A637(M) to M60 and proposing new motorway would tackle congestion</li> <li>• Due to topography and lack of a rail link, the M66 is the critical transport link between Rossendale/East Lancashire and the rest of the country. Local concern that economic growth, future development and social opportunities are being constrained by congestion.</li> </ul>
<p><b>Warehousing/Industry</b></p> <ul style="list-style-type: none"> <li>• The likely prominence of automation in industry in the future means that building further warehousing is unnecessary.</li> <li>• Warehousing is not the sort of industry that provides wages high enough to afford the types of proposed housing in this plan.</li> <li>• Kingsway Business Park has been open for at least ten years and it still is not full. No guarantee that building more mean economic growth.</li> <li>• Logistics should not be prioritised as it will generate relatively few poorly paid jobs and will do little to revive the economy of the northern boroughs.</li> <li>• Welcome the emphasis on promoting the opportunity for high quality, high productivity employment in growth sectors such as advanced manufacturing, and the commitment to development on a scale which will attract major inward investment.</li> </ul>
<p><b>Green Belt</b></p> <ul style="list-style-type: none"> <li>• The loss of Green Belt and quality farmland would cause pollution. Brownfield land should be used instead.</li> <li>• Removing land from the Green Belt could lead to urban sprawl.</li> <li>• Green Belt development would negatively affect air quality. Milnrow records the highest reportable level of nitrogen dioxide, adding further cars would add to this problem.</li> <li>• By not releasing enough land within the Green Belt in this area, the GMSF and GMCA risk not transforming the M62 Growth Corridor enough in order to attract businesses, jobs and much needed housing.</li> </ul>

## **Response to comments**

### Infrastructure

The GMSF is supported by detailed transport evidence which is reflected as appropriate in the detailed allocation policy associated with this strategic growth area policy. Proposed development will be supported by necessary infrastructure including the provision of appropriate sustainable travel opportunities and highway improvements and social infrastructure such as schools and health facilities.

### Warehousing/Industry

The level and types of economic development proposed in the GMSF have been identified in order to respond to the estimated employment land demand up to 2037. The economic strategy within the GMSF seeks to deliver inclusive growth by identifying a range of sites in a range of locations offering a mix of types of industry.

### Green Belt

The GMSF sets out a very clear preference of using previously developed (brownfield) land and vacant buildings to meet development needs. However, given the scale of development required to meet the needs of Greater Manchester a limited amount of development is required on greenfield and Green Belt land (some of which is farmland) as it is critical to the delivery of the overall vision and objectives of the plan. Greater Manchester is introducing a comprehensive range of measures to support improvements to air quality

## GM-Strat 8 Wigan Bolton Growth Corridor

<p><b>Principle of development</b></p> <ul style="list-style-type: none"> <li>• The development should work so long as all the objectives of the policy are implemented.</li> <li>• There was support for the new road link between M6 and M61, increased use of the Atherton rail line, three new potential stations and the extension of the rapid bus connections.</li> <li>• Support that the lowland wetlands and mosslands form part of the Green Infrastructure network and for the growth corridor generally as the area has many deprived communities so it is particularly important to ensure local people benefit</li> <li>• The approach towards building on brownfield sites was supported as was the infrastructure improvements to Westhoughton.</li> <li>• Environmental and social priorities should drive development not economic development.</li> <li>• Spatial concept of a growth corridor not liked.</li> <li>• The plan period should be shortened to identify requirement and necessary future Green Belt development.</li> </ul>
<p><b>Housing</b></p> <ul style="list-style-type: none"> <li>• Plans for luxury homes will not meet local housing needs.</li> <li>• Wigan can meet its housing need from sites in the urban area without the need to release West of Gibfield and North of Mosley Common from the Green Belt.</li> <li>• A higher level of growth in Wigan and Bolton is required to reflect the strategy of the corridor to create a regionally significant area of economic and residential development. As such more houses are required in Standish.</li> <li>• Bolton's housing requirement has been reduced by 3,000 dwellings which at odds with the objectives of the growth corridor.</li> </ul>
<p><b>Employment and Economy</b></p> <ul style="list-style-type: none"> <li>• Empty business units and vacant brownfield sites should be used first, and refurbished where necessary to meet modern business needs, before releasing land in the Green Belt for new units.</li> <li>• Too many warehouses are being built and are proposed along the M6, M61 and M62 and will have a significant cumulative impact on the Green Belt.</li> <li>• Highlighting logistics as a key driver of allocations will generate relatively few, poorly paid jobs and do little to revive the economy.</li> <li>• The projected growth in jobs is unreasonable.</li> </ul>
<p><b>Green Belt</b></p> <ul style="list-style-type: none"> <li>• Development sites in the growth corridor will result in significant urban sprawl, merging Atherton and Westhoughton.</li> <li>• A disproportionately large amount of Green Belt and greenspace will be lost around Westhoughton and Atherton compared to other areas in Greater Manchester.</li> <li>• The GMSF plan period should be shortened so that no Green Belt release is required.</li> </ul>
<p><b>Brownfield</b></p> <ul style="list-style-type: none"> <li>• Brownfield sites and vacant properties in the urban area should be developed before considering Green Belt.</li> </ul>
<p><b>Transport – Highways / Public Transport / Cycling / Walking</b></p> <ul style="list-style-type: none"> <li>• Leigh needs better connectivity and road capacity improvements to accommodate growth.</li> <li>• New road between M6 and M61 much needed to reduce journey times and reduce traffic congestion on existing roads.</li> <li>• The proposed transport links seem to gravitate towards Manchester on a North West to South East but nothing for North/South.</li> <li>• Allocation process seems to be based on accessibility to the M6 and M61 through a new strategic link road, however no consideration has been given to protect rail access to the sites.</li> <li>• New strategic link road will just open new green spaces for development.</li> </ul>

<ul style="list-style-type: none"> <li>• Improvement of road networks should also note the need to provide a safe fully accessible sustainable transport scheme from the outset.</li> <li>• Improvements to rail and Metrolink are required.</li> <li>• An outer circle Metrolink line is required to connect towns to avoid Manchester City Centre.</li> <li>• The links through the corridor should be extended eastwards so connections are made to Bury and Rochdale.</li> <li>• Little mention of public transport services to Hulton Park in light of the proposals.</li> <li>• Work needed to improve existing infrastructure e.g. making Daisy Hill train station wheel chair accessible.</li> </ul>
<p><b>Physical Infrastructure and utilities</b></p>
<ul style="list-style-type: none"> <li>• The growth corridor will have an impact on water, gas and electricity supplies.</li> </ul>
<p><b>Social Infrastructure</b></p>
<ul style="list-style-type: none"> <li>• Local schools, GP surgeries and dentists are at full capacity and will not be able to accommodate demand from the site.</li> </ul>
<p><b>Environmental – Green Infrastructure, Biodiversity, open space</b></p>
<ul style="list-style-type: none"> <li>• The development will result in the loss of wildlife habitats, some of which are protected.</li> <li>• The greenspace at Hulton Park should remain free for everyone to enjoy.</li> <li>• Public rights of way should be maintained.</li> </ul>
<p><b>Air Quality</b></p>
<ul style="list-style-type: none"> <li>• 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.</li> <li>• The new link road will increase noise pollution.</li> <li>• Concerns about cutting down of trees and impact on carbon storage.</li> <li>• Development leads an increase in air pollution and therefore failure to meet strategic objective 7 (make GM a carbon-neutral city region)</li> </ul>
<p><b>Flood risk</b></p>
<ul style="list-style-type: none"> <li>• Part of the site is at risk of flooding and should be protected from development.</li> <li>• Sustainable drainage systems should be implemented on site and referred to in the allocation policy.</li> </ul>
<p><b>Heritage</b></p>
<ul style="list-style-type: none"> <li>• Hulton Park is a Grade II listed property and should be protected</li> </ul>
<p><b>Other</b></p>
<ul style="list-style-type: none"> <li>• Concerns that investment in Bolton Town Centre has not been successful.</li> <li>• Investment in Wigan and Bolton Town centres in welcome and important for their vitality and viability.</li> <li>• Middlebook has taken investment away from Bolton Town Centre.</li> <li>• Economic regeneration should focus on town centres as they attract higher skilled employment, while out-of-town development can deepen low-skilled job markets and sectors.</li> <li>• 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.</li> <li>• More houses in the area will increase crime.</li> </ul>
<p><b>Response to comments</b></p> <p>Principle of development:  Support for aspects of the Policy is noted.  The Policy aims to boost the competitiveness of this part of Greater Manchester and deliver inclusive growth, including both employment and housing development. The GMSF needs to be read as a whole and this Policy should be read in conjunction with other GMSF Policies that focus</p>



upon environmental and social matters, such as meeting carbon commitments, green infrastructure and health.

#### Housing:

A mix of house types and tenures will be provided in accordance with GMSF Policy GM-H3, which states that development across Greater Manchester should seek to incorporate a range of dwelling types and sizes to meet local needs and deliver more inclusive neighbourhoods.

The GMSF Wigan's housing needs to 2037 cannot be met without the release of some Green Belt land for housing.

Sufficient land has been identified within the baseline land supply along the growth corridor to create a regionally significant area of economic and residential development.

The scale of housing growth required across Greater Manchester has been derived in the light of the Government's Standards Methodology and distributed to meet the wider aims of the GMSF strategy.

#### Employment and Economy:

There are no available and deliverable sites outside of the Green Belt in Wigan Borough that have the attributes – namely scale, prominence and direct accessibility to the strategic network – to capture the economic demand from growth sectors, including logistics, along the M6 Corridor.

Based on the Employment Density Guide produced by the Homes and Communities Agency (HCA), the site allocation at M6 Junction 25 is anticipated to generate in the region of 1,600 new full-time equivalent jobs.

Policy GM-P1 identifies the 8 main town centres in Greater Manchester amongst key locations that will help to maximise economic growth in an inclusive way, alongside the M6 Corridor hub in Wigan, and other locations including Salford Quays and Manchester City Centre.

#### Green Belt

Exceptional circumstances that outweigh the harm to the Green Belt have been demonstrated that justify the release of Green Belt land in the Wigan – Bolton Growth Corridor.

Green Belt is proposed for release in locations all over Greater Manchester and the level of release in the Atherton-Westhoughton area is not considered disproportionate and is necessary to meet development needs. Additional land is proposed for inclusion in the Green Belt at Ditchers Farm, Westhoughton.

#### Brownfield:

Prioritising the use of brownfield land to meet development needs is a key objective of the GMSF as set out in the strategic objectives and Policy GM-S1. Brownfield sites within the Corridor that are deemed suitable and deliverable for development are included within the land supply. However, there is simply not enough deliverable brownfield sites to meet identified needs.

#### Transport:

The Policy recognises the importance of sustainable transport and highlights that measures to improve the provision of bus services and to increase the use of rail lines will be implemented within the Corridor.

The Policy should be read in conjunction with other GMSF policies that cover transport issues in more detail. This includes policies on the provision of a sustainable and integrated transport network, public transport, streets for all, walking and cycling, freight and logistics, and transport requirements of new development.

Objective 8 of the GMSF is to improve the quality of our natural environment and access to green spaces. New development will be required to accord with Policies on creating a Greener Greater Manchester, when appropriate.

## GM-Strat 9 Southern Areas

<b>Principle / scale of development</b>
<ul style="list-style-type: none"> <li>• Concern about urban sprawl from the scale of development.</li> <li>• Agree that southern areas should take less development</li> <li>• Southern areas are being unfairly advantaged by taking less pressure from development and less Green Belt loss. Northern areas should have less development.</li> <li>• Attractiveness of the southern areas will be lost by loss of Green Belt.</li> <li>• Focusing development on northern and central areas will risk failing to meet housing and employment needs in the southern areas. Southern areas need more development.</li> <li>• Agree with sustaining and enhancing the attractiveness of the southern areas.</li> </ul>
<b>Housing (inc affordable housing)</b>
<ul style="list-style-type: none"> <li>• Increase the amount of affordable housing.</li> <li>• Oppose building of more housing in southern areas.</li> <li>• There is demand for family housing in southern areas that needs to be met.</li> </ul>
<b>Employment and Economy</b>
<ul style="list-style-type: none"> <li>• Southern areas are in a great position to attract economic prosperity.</li> </ul>
<b>Green Belt</b>
<ul style="list-style-type: none"> <li>• Opposition to releasing land from the Green Belt</li> <li>• Some support for the selective release of Green Belt</li> </ul>
<b>Brownfield</b>
<ul style="list-style-type: none"> <li>• Develop brownfield sites and reuse empty buildings before developing on Green Belt.</li> </ul>
<b>Transport – Highways / Public Transport / Cycling / Walking</b>
<ul style="list-style-type: none"> <li>• Development will increase road congestion.</li> <li>• Public transport links need to be improved.</li> <li>• Objections to the development of HS2.</li> <li>• Some support for HS2 based on it attracting new jobs and demand for housing.</li> </ul>
<b>Social Infrastructure</b>
<ul style="list-style-type: none"> <li>• Social infrastructure such as health services and schools are already overstretched and development will increase pressure on them.</li> </ul>
<b>Environmental – Green Infrastructure, Biodiversity, open space</b>
<ul style="list-style-type: none"> <li>• Wildlife habitat and agricultural land needs to be protected from development.</li> </ul>
<b>Air Quality</b>
<ul style="list-style-type: none"> <li>• Development will have a negative impact on air quality.</li> </ul>
<b>Flood risk</b>
<ul style="list-style-type: none"> <li>• Concern that more development will increase flood risk.</li> </ul>
<b>Heritage</b>
<ul style="list-style-type: none"> <li>• Conserve and enhance the setting of heritage assets in the area including Dunham Massey, Quarry Bank Mill and Lyme Park.</li> </ul>
<b>Other</b>
<ul style="list-style-type: none"> <li>• Expansion of Manchester Airport will increase air pollution, noise pollution, aviation fuel smells, traffic congestion, land taken up by airport parking and will contribute to climate change.</li> <li>• Some support for expansion of Manchester Airport and that the Airport should be fully taken advantage of as an asset for new housing and economic development.</li> </ul>

## **Response to comments**

### Principle / scale of development

The GMSF identifies sufficient land to meet the housing needs of Greater Manchester. The land has been identified in a way that meets the overall Vision and Objectives of the plan. The spatial strategy seeks to deliver inclusive growth across Greater Manchester, helping to reduce inequalities and poverty in Greater Manchester communities. The GMSF sets out a very clear preference of using previously developed (brownfield) land and vacant buildings to meet development needs. However, given the scale of development required to meet the needs of Greater Manchester a limited amount of development is required on greenfield and Green Belt land as it is critical to the delivery of the overall vision and objectives of the plan.

### Housing (incl affordable housing)

As a whole the GMSF aims to deliver at least 50,000 affordable homes by 2037, however, the specific requirements for local areas will be set by the relevant local planning authority. The GMSF identifies sufficient land to meet the overall housing needs of Greater Manchester. The land has been identified in a way that meets the overall Vision and Objectives of the plan and will deliver a mix of housing sizes and types

### Employment and economy

Comment noted.

### Green Belt

Support noted. The GMSF sets out a very clear preference of using previously developed (brownfield) land and vacant buildings to meet development needs. However, given the scale of development required to meet the needs of Greater Manchester a limited amount of development is required on greenfield and Green Belt land as it is critical to the delivery of the overall vision and objectives of the plan.

### Brownfield

The GMSF sets out a very clear preference of using previously developed (brownfield) land and vacant buildings to meet development needs. However, given the scale of development required to meet the needs of Greater Manchester a limited amount of development is required on greenfield and Green Belt land as it is critical to the delivery of the overall vision and objectives of the plan.

### Transport – Highways / Public Transport / Cycling / Walking

The GMSF is supported by detailed transport evidence which is reflected as appropriate in the detailed allocation policies associated with this strategic growth area policy. Proposed development will be supported by necessary infrastructure including the provision of appropriate sustainable travel opportunities and highway improvements. HS2 is a national infrastructure project, however its anticipated completion towards the end of the plan period will dramatically reduce journey times to London, Birmingham and other cities in the North and will therefore further enhance the attractiveness and potential of Greater Manchester

### Social Infrastructure

Proposed development will be supported by necessary infrastructure including the provision of appropriate social infrastructure such as schools and health facilities

### Environmental – Green Infrastructure, Biodiversity, open space

Where development is necessary, it will provide appropriate safeguards and/or mitigation in relation to environmental matters.

**Air quality**

GM Strat 9 is a high-level strategic policy, the GMSF needs to be read as a whole. As set out in the Clean Air Policy in the GMSF, Greater Manchester is introducing a comprehensive range of measures to support improvements to air quality.

**Flood risk**

The GMSF is supported by a Strategic Flood Risk Assessment, the findings of which have been included as necessary in the relevant allocation policies in the plan as GM Strat 9 is a high-level strategic policy. Additionally new development will be guided by the policy framework set by the Flood Risk and the Water Environment policy which promotes an integrated catchment based approach.

**Heritage**

GM Strat 9 is a high-level strategic policy. The GMSF needs to be read as a whole, the Heritage Policy sets out an approach to positively preserve and enhance the significance of Greater Manchester's designated and non-designated heritage assets

**Other**

Manchester Airport is the third busiest passenger airport in the UK and is a key factor in realising the wider growth agenda for the North. Development at Manchester Airport will be in line with Manchester Airport Group's Corporate Social Responsibility Strategy (CSR). The CSR recognises that aviation is one of the hardest industries to decarbonise and as such it sets out a commitment to achieving net zero carbon emissions from their airport operations by 2038

**Policy GM-Strat 10: Manchester Airport**

<b>Principle / scale of development</b>
<ul style="list-style-type: none"> <li>• Support expressed for the policy identifying that continued expansion of the airport is required for further development in the city/ broader region; is vital for further travel opportunities; important for the provision of jobs; and helping to provide local authority investment funding/keeping council tax bills down.</li> <li>• Incompatibility of the development proposals and the plans objectives for carbon neutral development/ climate change mitigation.</li> </ul>
<b>Housing</b>
<ul style="list-style-type: none"> <li>• Housing in the correct areas is important to support the expansion.</li> </ul>
<b>Employment and Economy</b>
<ul style="list-style-type: none"> <li>• Suggested that the airport is bringing international business and consequently jobs to Manchester. Improving the links will definitely improve prosperity in the region.</li> <li>• Growing business via the Airport City will suck business investment from other parts of the conurbation moving wealth to the South and increasing demand and congestion on already strained infrastructure.</li> <li>• There is too much proposed office space at the airport. Unused office space across Manchester should be used instead.</li> </ul>
<b>Green Belt</b>
<ul style="list-style-type: none"> <li>• Concerns about the proposed Green Belt deletions proposed with respect to allocations at the airport or nearby locations.</li> </ul>
<b>Transport – Highways / Public Transport / Cycling / Walking</b>
<ul style="list-style-type: none"> <li>• Improving transport links to the airport are important to facilitate further growth at the airport (delivery of HS2/ Northern Powerhouse Rail).</li> <li>• Some scepticism over whether HS2 and Northern Powerhouse Rail will be delivered</li> </ul>
<b>Air Quality</b>
<ul style="list-style-type: none"> <li>• Concerns with respect to aviation fuel pollution from existing and increasing levels of flights planned.</li> </ul>
<b>Other</b>
<ul style="list-style-type: none"> <li>• Too much focus on air transport will not help Greater Manchester to become carbon neutral.</li> <li>• No details on how increased carbon emissions associated with increased traffic through the airport will be dealt with.</li> <li>• Concerns about increasing noise pollution from the proposed expansion plans.</li> <li>• Must reduce air travel if we are to save our environment.</li> <li>• Delays in getting in and out of the Airport are becoming increasingly more strenuous.</li> <li>• Concerns expressed that car parking charges, including for drop-off and pick-up are unpopular.</li> </ul>
<b>Responses to comments</b>
<p>Principle / scale of development</p> <p>Support for the policy noted. Manchester Airport is the third busiest passenger airport in the UK and is a key factor in realising the wider growth agenda for the North. Development at Manchester Airport will be in line with Manchester Airport Group's Corporate Social Responsibility Strategy (CSR). The CSR recognises that aviation is one of the hardest industries to decarbonise and as such it sets out a commitment to achieving net zero carbon emissions from their airport operations by 2038.</p> <p>Housing</p> <p>Comments noted</p>

#### Employment and Economy

The level and types of economic development proposed in the GMSF have been identified in order to respond to the estimated employment land demand up to 2037 and the land has been identified in a way that meets the overall Vision and Objectives of the plan

#### Green Belt

The GMSF sets out a very clear preference of using previously developed (brownfield) land and vacant buildings to meet development needs. However, given the scale of development required to meet the needs of Greater Manchester a limited amount of development is required on greenfield and Green Belt land as it is critical to the delivery of the overall vision and objectives of the plan.

#### Transport – Highways / Public Transport / Cycling / Walking

The GMSF is supported by detailed transport evidence which is reflected as appropriate in the detailed allocation policy associated with this strategic growth area policy. Proposed development will be supported by necessary infrastructure including the provision of appropriate sustainable travel opportunities and highway improvements. HS2 is a national infrastructure project, however its anticipated completion towards the end of the plan period will dramatically reduce journey times to London, Birmingham and other cities in the North and will therefore further enhance the attractiveness and potential of Greater Manchester.

#### Air Quality

GM Strat 10 is a high-level strategic policy, the GMSF needs to be read as a whole. As set out in the Clean Air Policy in the GMSF, Greater Manchester is introducing a comprehensive range of measures to support improvements to air quality. Additionally development at Manchester Airport will be in line with Government Policy and Manchester Airport Group's Corporate Social Responsibility Strategy (CSR).

#### Other

Development at Manchester Airport will be in line with Manchester Airport Group's Corporate Social Responsibility Strategy (CSR). The CSR recognises that aviation is one of the hardest industries to decarbonise and as such it sets out a commitment to achieving net zero carbon emissions from their airport operations by 2038. The GMSF is supported by detailed transport evidence which is reflected as appropriate in the detailed allocation policy associated with this strategic growth area policy. Proposed development will be supported by necessary infrastructure including the provision of appropriate sustainable travel opportunities and highway improvements

**GM-Strat 11: New Carrington**

<b>Principle / scale of development</b>
<ul style="list-style-type: none"> <li>• The site will contribute to meeting the housing land supply shortfall</li> <li>• The New Carrington site does not align with the GMSF objective to invest in the north of Greater Manchester</li> <li>• General concern that the scale of the site, across three different communities will lead to a loss of local identity</li> <li>• Ensure that the relationship between new development and the existing Partington estate is satisfactory.</li> </ul>
<b>Housing (inc affordable housing)</b>
<ul style="list-style-type: none"> <li>• Significant support for affordable housing with many responses stating that the 30% requirement should be higher, conversely some developers object to the 30% requirement</li> <li>• There is a need for affordable housing which is suitable for both families and single individuals</li> <li>• Concern that 'affordable' housing is not genuinely affordable to many people</li> <li>• Much of the housing stock in this area is terraced housing and there is a need for detached, family housing</li> </ul>
<b>Employment and Economy</b>
<ul style="list-style-type: none"> <li>• No evidence to support the need for such a large amount of employment land</li> <li>• The proposed warehouse development will not generate sufficient jobs in the local area</li> <li>• Some support from respondents for the proposed employment land around the north of the site, adjacent to existing employment areas</li> </ul>
<b>Green Belt</b>
<ul style="list-style-type: none"> <li>• Significant objection to the loss of Green Belt land</li> <li>• General concern that the level of Green Belt loss in Trafford is disproportionate considering the currently small amount of Green Belt in Trafford when compared with other GM districts</li> <li>• The proposed loss of green space will have a negative impact on health and wellbeing</li> <li>• Concern about how the remaining Green Belt will be protected</li> </ul>
<b>Brownfield</b>
<ul style="list-style-type: none"> <li>• Support brownfield development within the New Carrington allocation</li> <li>• Respondents considered that housing should be delivered on the brownfield land only, this would negate the need for Green Belt release</li> </ul>
<b>Transport – Highways / Public Transport / Cycling / Walking</b>
<ul style="list-style-type: none"> <li>• Significant concern about existing congestion issues on the road network, particularly on the A6144 through Carrington</li> <li>• Many respondents noted the limited information about the transport infrastructure needed to deliver the New Carrington site</li> <li>• Significant concern from some residents about the proposed Carrington Relief Road and the lack of consultation on this proposal</li> <li>• Some support for new link roads to relieve existing congestion</li> <li>• Need to understand the impact the New Carrington development will have on the M60, Junction 8</li> <li>• Existing public transport network is limited and the cost of many services is prohibitive to current residents using the network</li> <li>• Significant support for improved public transport infrastructure and cycling and walking routes</li> <li>• Rights of Way should be maintained with the same amenity value</li> </ul>

<p><b>Physical Infrastructure and utilities</b></p> <ul style="list-style-type: none"> <li>• Significant COMAH and gas pipe constraints across the site which will restrict development</li> <li>• A landscape buffer should be retained around the Altrincham waste water treatment works. There may also be a need to expand the treatment works in future.</li> </ul>
<p><b>Social Infrastructure</b></p> <ul style="list-style-type: none"> <li>• Concern that GP practices in the area are already overstretched and that new provision would be required to support the development</li> <li>• Many schools are already oversubscribed, particularly at primary level</li> </ul>
<p><b>Environmental – Green Infrastructure, Biodiversity, open space</b></p> <ul style="list-style-type: none"> <li>• Significant concern about the loss of wildlife habitats</li> <li>• Significant objection to the loss of mossland, respondents considered that this should be retained for its biodiversity value and as a carbon store</li> <li>• Concern about the loss of green infrastructure</li> <li>• Concern about the landscape impact of the development. Much of the site is currently open countryside</li> <li>• The site offers an opportunity for biodiversity net gain</li> </ul>
<p><b>Air Quality</b></p> <ul style="list-style-type: none"> <li>• Development will have a negative impact on air quality</li> <li>• Concern that the proposed new roads will impact on air quality</li> </ul>
<p><b>Flood risk</b></p> <ul style="list-style-type: none"> <li>• Carrington Moss floods on a regular basis and helps to prevent flooding of the surrounding area</li> <li>• Sustainable Drainage Systems (SUDS) should form part of the development</li> </ul>
<p><b>Heritage</b></p> <ul style="list-style-type: none"> <li>• Development to the south of the allocation needs to consider the setting of Dunham Massey</li> </ul>
<p><b>Other</b></p> <ul style="list-style-type: none"> <li>• The Carrington site does not fit the GMSF Spatial Strategy</li> <li>• Significant concern that the development will cause increased noise and light pollution</li> <li>• Object to safeguarded land within the allocation and consider this should be available for development within the plan period</li> <li>• Some developers support the requirement for a Masterplan or similar, whilst others object to this requirement</li> <li>• Likely to be construction difficulties associated with development on a peat bog</li> <li>• The GMSF consultation has not been properly publicised</li> </ul>
<p><b>Responses to comments</b></p> <p>Principle / scale of development</p> <p>This site contributes to meeting the employment and housing needs identified for Greater Manchester. The GMSF needs to identify sufficient land to meet the housing and employment land needs of Greater Manchester. The land has been identified in a way that meets the overall Vision and Objectives of the plan. The spatial strategy seeks to deliver inclusive growth across Greater Manchester, helping to reduce inequalities and poverty in Greater Manchester communities. New development in this growth area will be fully integrated with the existing communities of Carrington, Partington and Sale West recognising their local character.</p>



#### Housing (inc affordable housing)

The GMSF is supported by detailed viability evidence. As a whole the GMSF aims to deliver at least 50,000 affordable homes by 2037. It is through its Housing Strategy that Greater Manchester sets out its approach to tackle the housing crisis including acknowledging that there is a variety of ways to deliver affordable homes. The specific affordable housing requirements for New Carrington are set out in the associated allocation policy, based on the findings of the viability evidence. The allocation will deliver a mix of housing sizes and types.

#### Employment and Economy

Support for the policy noted. The level and types of economic development proposed in the GMSF have been identified in order to respond to the estimated employment land demand up to 2037

#### Green Belt

The GMSF sets out a very clear preference of using previously developed (brownfield) land and vacant buildings to meet development needs. However, given the scale of development required to meet the needs of Greater Manchester a limited amount of development is required on greenfield and Green Belt land as it is critical to the delivery of the overall vision and objectives of the plan. The remaining Green Belt will continue to be protected through the National Policy and the GMSF and evidence has been prepared to identify opportunities to enhance the beneficial use of the Greater Manchester Green Belt

#### Brownfield

Support for the policy noted. The GMSF sets out a very clear preference of using previously developed (brownfield) land and vacant buildings to meet development needs. However, given the scale of development required to meet the needs of Greater Manchester a limited amount of development is required on greenfield and Green Belt land as it is critical to the delivery of the overall vision and objectives of the plan.

#### Transport – Highways / Public Transport / Cycling / Walking

The GMSF is supported by detailed transport evidence which is reflected as appropriate in the detailed allocation policy associated with this strategic growth area policy. Proposed development will be supported by necessary infrastructure including the provision of appropriate sustainable travel opportunities (both public transport and active travel opportunities) and highway improvements

#### Physical Infrastructure and utilities

GM Strat 11 is a high-level policy, constraints such as those listed above have informed the details set out in the allocation policy in the GMSF

#### Social Infrastructure

Proposed development will be supported by necessary infrastructure including the provision of appropriate social infrastructure such as schools and health facilities

#### Environmental – Green Infrastructure, Biodiversity, open space

GM Strat 11 is a high-level policy however the detailed allocation policy states that natural environment assets within the site and surrounding area will be protected and enhanced. There will be an enhanced delivery of ecosystem services through the restoration and creation of areas of wetland within the site in the context of the Local Nature Recovery Network for Greater Manchester.

#### Air Quality

GM Strat 11 is a high-level strategic policy, elsewhere in the GMSF there is a policy dealing with Air Quality and the GMSF needs to be read as a whole. This policy is part of

a comprehensive range of measures being introduced by Greater Manchester to support improvements to air quality

#### Flood risk

The GMSF is supported by a Strategic Flood Risk Assessment, the findings of which have been included as necessary in the relevant allocation policies in the plan, GM Strat 11 is a high-level strategic policy. Additionally, a specific thematic policy (Flood Risk and the Water Environment) promotes an integrated catchment based approach which includes a policy framework in relation to sustainable drainage systems

#### Heritage

GM Strat 11 is a high-level strategic policy, however the detailed allocation policy is supported by a Heritage Assessment and seeks to positively conserve all aspects of the historic environment. Additionally the Heritage Policy within the GMSF sets out an approach to positively preserve and enhance the significance of Greater Manchester's designated and non-designated heritage assets

#### Other

This site contributes to meeting the employment and housing needs identified for Greater Manchester. The GMSF allocations have been identified through a site selection process which sets out a number of criteria in order to ensure that the overall spatial strategy meets the Vision and Objectives of the plan. GM Strat 11 is a high-level policy, the detailed policy framework for the area can be found in the associated allocation policy. As required, the GMSF 2019 consultation was carried out in line with the relevant district's Statement of Community Involvement

## GM-Strat 12: Main Town Centres

<p><b>Town Centres</b></p> <ul style="list-style-type: none"> <li>• Towns need to become the distinctive, local and unique places that they once were. Investment is required to allow town centres to compete. Town centres need revitalising, not just redeveloping.</li> <li>• Policies need to look at more than just the top tier of towns such as Denton.</li> <li>• Town centres in the city-region are overdeveloped and as a result, congestion is becoming an issue.</li> <li>• Policy of increased densities is wrong. We should make areas less dense so people can see nature with sub-centres in each area allowing local access to shops and services.</li> <li>• Potential for service industries such as finance and legal in Altrincham and Stockport. Can encourage small businesses by lowering rates.</li> <li>• Concerned that local authorities are financing redevelopment of retail centres when money should be going into affordable housing, care workers, social services, youth clubs, more policing etc.</li> <li>• Note the contradiction between building in the centre, south and north and building fast transit to the Trafford Centre and the policies on improving town centres.</li> </ul>
<p><b>Transport</b></p> <ul style="list-style-type: none"> <li>• Concerned about air pollution and air quality from traffic.</li> <li>• Town centres are not the main transport hubs. The buses do not work, the roads are very busy, the Metrolink does not run to maximum frequency and are too expensive and the trains are too infrequent.</li> <li>• Not enough car parking in centres, roads are gridlocked and public transport is too expensive.</li> <li>• Hard to attract investment to town centres when the Metrolink provides a short journey to one of the nation's best city centres.</li> <li>• More parking is required at Metrolink stops.</li> <li>• Stockport should be connected to the Metrolink.</li> </ul>
<p><b>Housing</b></p> <ul style="list-style-type: none"> <li>• Change of focus needed on town centres. They need to become more residential which would then attract more businesses. It will also improve footfall and help create vibrancy.</li> <li>• Adding extra houses to town centres is not the solution to prevent their decline.</li> <li>• The type of housing being built is not for young people so it will not encourage town centres to thrive. We need more terraced/town houses so that more green space is preserved. We need housing for more affluent people to encourage them to use nearby town centres.</li> <li>• If we only build apartments, people will just move out when they want to start a family or become more successful.</li> </ul>
<p><b>Retail</b></p> <ul style="list-style-type: none"> <li>• More encouragement is needed of small, independent and local businesses to provide a unique offer. Every town centre has half of the same shops as each other currently.</li> <li>• The amount of empty shops needs to be addressed. Retail rents need to be more affordable so that they can be filled.</li> <li>• Concerned about the loss of traditional marketplaces within town centres.</li> <li>• Need to move away from building out of town retail parks.</li> <li>• Need to help shops survive rather than turning them into residential use.</li> </ul>
<p><b>Response to comments</b></p> <p>Town Centres</p> <p>Town centres will continue to be developed as local economic drivers and will rightly be the focus for office, retail, leisure and cultural activity. Town centres are amongst the most accessible locations by public transport, cycling and walking. The policy in the GMSF to apply higher densities within town centres means that the release of greenfield and Green Belt land can be</p>

kept to a minimum. The main town centres identified in the GMSF are complemented by a diverse collection of smaller town centres and local centres across the ten districts, each of which have an important role to play in the future growth of Greater Manchester.

#### Transport

The GMSF seeks to develop the roles of the town centres as major transport hubs by creating a network of active travel routes. The GMSF is supported by detailed transport evidence however, it is a high-level, strategic plan and detailed parking policies would therefore be more appropriate to district local policies. As set out in the Clean Air Policy in the GMSF, Greater Manchester is introducing a comprehensive range of measures to support improvements to air quality.

#### Housing

The GMSF clearly states that opportunities to further increase the population in these centres will be taken. Expanding the resident population will be part of a package of measures, some strategic and some local in nature, which will generate the necessary footfall and vibrancy to sustain facilities. The GMSF promotes a mix of type and size of home to meet the needs of the population, supported by the necessary infrastructure

#### Retail

The GMSF seeks to provide the right conditions to enable town centres to adapt and respond to changing circumstances, which will enable them to generate the necessary footfall and vibrancy to sustain facilities. The policies in the GMSF will also be complemented by other initiatives both at a national and local level to ensure that town centres continue to be the focus for office, retail, leisure and cultural activity.

## GM-Strat 13: Strategic Green Infrastructure

<b>Principle</b>
<ul style="list-style-type: none"> <li>• Strongly agree with the policy to protect and enhance Green and Blue Infrastructure assets</li> <li>• Green Infrastructure is very important to health and wellbeing of people and the identity and sustainability of a place, and so should be integrated into new and existing communities, aided by planning policy The GMSF underestimates the importance of Green Infrastructure, and there is a need for joined-up thinking between this policy and other conflicting policies</li> <li>• The term Green Infrastructure is vague and does not provide specific details of what it will include</li> <li>• Green infrastructure needs to be joined up with adjoining strategic planning and Green Infrastructure provision, not end at the Greater Manchester boundary This is not a strategic policy and should be deleted</li> <li>• There is little point providing further Green Infrastructure if the existing parks and amenities are not going to be improved. Any new parks and amenities need to be ring-fenced for maintenance</li> </ul>
<b>Scope</b>
<ul style="list-style-type: none"> <li>• Urban Green Infrastructure, including parks in town centres and growth areas, should be referenced in the policy</li> <li>• The fourth strategic green infrastructure asset “Trees and woodland” should be renamed to clearly include hedgerows</li> <li>• The existing network of footpaths and public rights of way are critical in GM and should be classed as ‘strategic’ in planning terms</li> </ul>
<b>Implementation</b>
<ul style="list-style-type: none"> <li>• Public access to green and blue spaces should be guaranteed to those spaces created and enhanced</li> </ul>
<b>Response to comments</b>
<p><b>Principle</b></p> <p>Support for the policy is noted. Protecting and enhancing the green infrastructure network throughout Greater Manchester is central to the overall vision for the city region. GM Strat 13 is a high-level policy which is supported by more a detailed policy framework within The Greener GM Chapter of the GMSF. Additionally the GMSF makes it clear that development will be supported by the necessary infrastructure including green infrastructure</p> <p><b>Scope</b></p> <p>GM Strat 13 is a high-level policy which is supported by more a detailed policy framework within The Greener GM Chapter of the GMSF. The categories defined in the high-level policy are considered to be the key features within Greater Manchester. However, it is recognised that other types of green infrastructure have a valuable role to play in the green infrastructure network in Greater Manchester</p> <p><b>Implementation</b></p> <p>Ensuring that there is a high quality network of green infrastructure is vital to the long-term success, sustainability and resilience of Greater Manchester. As detailed in the Greener GM Chapter, wherever practicable, opportunities to integrate new and existing green infrastructure into new development will be taken to protect, enhance and expand the green infrastructure network.</p>

## GM-Strat 14: Sustainable and Integrated Transport Network

<p><b>Principle</b></p> <ul style="list-style-type: none"> <li>• Agree with all general statements but the current network is not well integrated. Nothing is stated in these policies about seamless travel.</li> <li>• From an inclusive growth perspective, endorse the emphasis on the development of an integrated and sustainable transport network in GM and would particularly emphasise the need to use Mayoral powers over transport to improve connectivity and reduce travel costs for low-paid workers, including: ensuring that public transport connects workers to employment sites outside ‘office hours’ to enable shift work; and that local journeys around the conurbation are facilitated, not just radial routes.</li> <li>• New developments should be designed with public transport networks from the outset, and routes need to link homes to local centres and places of employment.</li> <li>• Greater Manchester needs a comprehensive public transport network that better reflects the 24/7 / night-time economies.</li> <li>• Public transport outside of the Regional Centre is inadequate and does not provide credible alternative to the private car.</li> <li>• Public transport needs to be affordable, reliable, accessible, comprehensive and safe</li> </ul>
<p><b>Metrolink</b></p> <ul style="list-style-type: none"> <li>• Metrolink encourages people to get out of their car and relieves traffic on the road network, there is support for further expansion of the Metrolink network.</li> <li>• Current Metrolink network is overcrowded and cannot accommodate more passengers or stops. There is also some criticism about the cost of travel on Metrolink.</li> <li>• Criticism about the hub and spoke model of Metrolink operation and a call for Metrolink to establish orbital links between radial towns.</li> </ul>
<p><b>Cycling</b></p> <ul style="list-style-type: none"> <li>• Greater Manchester needs a comprehensive and co-ordinated cycling strategy which supports behaviour change and provides a network of cycling routes.</li> <li>• There is too much focus on cycling; the topography and climate of Greater Manchester are not suitable for cycling. Most people live too far from their work to be able to commute by bike.</li> </ul>
<p><b>Pollution and congestion</b></p> <ul style="list-style-type: none"> <li>• Roads and motorways are congested and new developments will make them worse. Plans for public transport are not comprehensive enough to achieve modal shift and reduce congestion.</li> <li>• Increasing activity at the Airport will cause more pollution.</li> </ul>
<p><b>Response to comments</b></p> <p>Principle The GMSF seeks to significantly reduce the need to travel by private car and as such is supported by a comprehensive package to improve transport facilities across Greater Manchester. These include improvements in the public realm and walking and cycling facilities and addressing current network capacity issues which will enable the future expansion of the rapid transit public transport network across Greater Manchester.</p> <p>Metrolink The GMSF is supported by a comprehensive package to improve transport facilities across Greater Manchester including addressing current network capacity issues. This will enable the future expansion of the rapid transit public transport network across Greater Manchester including the development of orbital links. Additionally initiatives such as integrated smart ticketing and reform of the bus market will have the potential to bring significant benefits to the network</p>

#### Cycling

GM Strat 14 is a high-level policy, further details on cycling policy can be found in the “Our Network” chapter which is also complemented by initiatives such as the Bee Network which is a vision for Greater Manchester to become the first city-region in the UK to have a joined up walking and cycling network. Initiatives such as this seek to deliver high quality new and improved cycling and walking routes which will reduce barriers that currently discourage people from cycling and walking.

#### Pollution and congestion

GM Strat 14 is a high-level strategic policy, the GMSF needs to be read as a whole. As set out in the Clean Air Policy in the GMSF, Greater Manchester is introducing a comprehensive range of measures to support improvements to air quality. Additionally development at Manchester Airport will be in line with Government Policy and Manchester Airport Group’s Corporate Social Responsibility Strategy (CSR) which sets out the Airport’s commitment to guide the sustainable development of the Airport.

### 3.1.4. A Sustainable and Resilient Greater Manchester

There were 3,807 comments made in relation to this chapter. There was support for the policies in general however several respondents challenged the policies around carbon and energy (hydraulic fracturing) as being contrary to national policy, whilst some felt the policy did not go far enough and should be extended to all shale gas resources.

Whilst policies around zero net carbon development/heat networks were generally supported in principle, some respondents requested greater clarity on what this would mean in practice and raised concerns around the impact on viability.

More detailed comments in relation to specific elements of the policies are set out below

<b>Sustainable Development</b>
<ul style="list-style-type: none"> <li>• This policy implies a sequential approach to site selection and that previously developed land will take precedence over the development of greenfield land.</li> <li>• National planning policy requires plans to make as much use as possible of previously developed or 'brownfield' land (except where this would conflict with other national planning policies).</li> <li>• Climate change is the biggest challenge facing humanity and a commitment to sustainable development should be about preventing destruction of Green Belt and building on brownfield sites instead.</li> <li>• Preferring to use brownfield land is inconsistent with national planning policy.</li> </ul>
<b>Communications Infrastructure</b>
<ul style="list-style-type: none"> <li>• There is a need to ensure that mobile communications connectivity reaches all parts of the Greater Manchester area with emphasis on those areas where demand is highest.</li> <li>• Development locations must have access to high-data networks including 5G.</li> <li>• The GMSF should set aside land for telecommunications infrastructure within employment and residential allocations.</li> <li>• Enable the roll-out of the latest generation of mobile technology (5G) and full fibre whilst protecting townscape quality.</li> </ul>
<b>Electricity Infrastructure</b>
<ul style="list-style-type: none"> <li>• There needs to be an assessment of the impact of new development upon existing infrastructure.</li> <li>• Prioritising the use of brown field land, building at higher densities, and a desire to maximise town centre growth, will result in additional electricity demand on the urban network.</li> <li>• Details of where and when developments are likely to occur is essential in forward planning terms so to provide sufficient future electrical network capacity across the GM area in the right places at the right time.</li> <li>• Although Manchester's urban landscape is not suited to large scale renewable developments, it is ideally placed to benefit from increased local solar generation.</li> <li>• Statutory safety clearances between overhead lines, the ground, and built structures must not be infringed.</li> <li>• Land beneath and adjacent to overhead power lines route should be used to make a positive contribution to the development of a site, e.g. used for nature conservation or open space.</li> <li>• Although it is preferred that buildings are not built directly beneath high voltage overhead lines, there are practical solutions which can assist in avoiding the unnecessary sterilisation of land in their vicinity.</li> </ul>



- There is a strategic scale brownfield land resource (e.g. arising from the closure of former gas works) which could accommodate a material proportion of Greater Manchester’s requirement for new homes and/or industrial/warehouse/commercial space over the plan period.

**Shale Gas Resources**

- The presumption against hydraulic fracturing is unjustified and unreasonable.
- It was felt by many respondents that it is too early to know if fracking is safe or not so the Greater Manchester stance against fracking is welcomed.
- In order to achieve our green agenda as set out in the plan it was agreed that fracking would seriously undermine this and only perpetuate our reliance on fossil fuels.
- There was support especially for “keeping fossil fuels in the ground”, and the presumption against hydraulic fracturing that results, as it was argued that shale gas is not the answer to our energy needs. A Joint Minerals Plan Review needs to be instigated and attention was drawn to the recent ‘Talk Fracking’ High Court Judgement which allows plan-making and decision-making authorities to reconsider the impacts of fracking on climate change; rather than just rely on the current wording of the National Planning Policy Framework
- There was some support for fracking in that we need to have an independent energy resource as the UK is too dependent on imported gas at the moment.
- In the short term it was argued that to accommodate the predicted growth outlined in the plan we need to embrace coal bed methane extraction and fracking. The GMSF should highlight the importance of gas in Manchester’s Energy mix, the importance of maintaining energy security, and also of utilising the UKs own indigenous sources of gas, rather than imports.
- It was also felt by some that the presumption against hydraulic fracturing is unjustified and unreasonable. The GMSF is entirely contrary to the Government policy position contained within the National Planning Policy Framework, Planning Policy Guidance and the Written Ministerial Statement.
- Any Plan that impedes or prevents development for hydrocarbons in areas where they have been found and licensed by Government is unsound without strong evidential justification (which is absent from the Frameworks supporting evidence).
- The framework fails to recognise that minerals can only be worked where they occur; the contribution hydrocarbons make and will continue to make to ensuring a secure and diverse sustainable energy supply; and that the use of hydrocarbons will contribute towards a carbon neutral economy, reduce the impact of climate change, and contribute to achieving the Frameworks objectives.
- Ending fossil fuels could have consequences for householders off the gas grid who may use oil for their central heating, and who may therefore be required to purchase electric heating, with huge up-front costs.
- The Framework should specify the consequences of its policy objectives so that developers and businesses are able to plan accordingly.
- There are several terms within the framework that are insufficiently explained or defined as regards their meaning within a Greater Manchester context, i.e. ‘carbon neutral’, ‘decentralised networks’, ‘zero carbon’, ‘heat demand reduction’ and ‘fossil fuels’.
- Achieving zero net carbon emissions by 2038 is overly optimistic when compared to the UK wide target of 2050.
- The GMSF should not set policies which require compliance with energy performance standards that exceed the energy requirements of current Building Regulations.
- The GMSF is inconsistent with regard to its required reductions in carbon emissions.
- Alternative routes to heat decarbonisation may be cheaper and more convenient than retro-fitting, such as a conversion to hydrogen, or injection of bio gas into the grid. Hydrogen produced by natural gas can still be carbon neutral

### **Heat and Energy Networks**

- It was felt that all opportunities to reduce carbon emissions are welcomed even though some respondents were unclear as to what a heat network actually is.
- There was a suggestion that households and businesses should be offered grants to enable assessment of heating systems and heat loss.
- The requirement for all development over 10 dwellings to evaluate the viability of connecting to a heat/energy network is inconsistent with national policy.
- The policy would introduce uncertainty for development and the potential for an unnecessarily protracted planning application process.
- It is up to GMCA to demonstrate whether such a requirement to connect would be viable, and to assess this at the plan-making stage. It is not clear what is meant by a 'presumption in favour of network connection'.
- Heat networks should be delivered where/when they are the best solution for consumers, not as a uniform policy for all new developments of over 10 dwellings.

### **Resilience**

- Preventing incidents should be given priority, not recovering from them.
- There were concerns that building on Green Belt as will increase flooding.
- There needs to be greater awareness around climate change, healthy lifestyles and environment.
- Retro-fitting existing buildings should be given priority.
- New housing requires new supporting healthcare, education and emergency services, and transport infrastructure.
- Sustainable design and construction methods should be used in new development.
- There was a concern at extent of GM's reliance on imported food, dependence on fossil fuels and lack of (local) facilities to deal with war, famine or major disease outbreak.
- There was a concern about the air quality impacts arising from traffic associated with new development.
- Support for having resilience mechanisms in place to protect communities.

### **Flood Risk and the Water Environment**

- More investment is needed in flood prevention and concern over loss of green space and the consequent increase in flood risk
- The policy is considered to be vital, especially in light of climate change but there is concern that any policy will not be enforced.
- The Framework should set out how development can achieve a significant volume reduction in surface water discharge with no surface water discharging to the existing public combined sewerage network.
- It would be appropriate to split managing flood risk (Policy GM-S 5) and surface water management into two policies. This approach will appropriately embed the intentions of national policy with respect to meeting the requirements of the surface water hierarchy as referenced in the National Planning Policy Framework.
- It is critical for early phases of development to provide the drainage infrastructure to ensure the discharge of drainage for any later interconnecting phases of development.
- The design of new development should consider the inclusion of water efficiency measures in the construction of new buildings. New development should encourage water efficiency measures including water saving and recycling measures to minimise water usage.
- Development on any of the allocations within the GMSF should include a policy requirement that they are informed by allocation-wide strategies for infrastructure including an allocation wide strategy for foul drainage, surface water drainage and clean water supply.

<b>Clean Air</b>
<ul style="list-style-type: none"> <li>• It was highlighted that development (especially of greenfield sites and building of roads) will be detrimental to air quality and other energy solutions such as hydrogen should be pursued</li> <li>• There was concern that GMSF is seeking to go beyond national policy and it questioned as to what justification there is for doing this.</li> <li>• It is unnecessary for any development which could have an adverse impact on air quality to make appropriate provision for future air pollution monitoring.</li> <li>• The need for pollution monitoring should be limited to where/when mitigation is required due to the degree of adverse impact, and where/when it is necessary for that mitigation to be monitored over time.</li> <li>• Electric buses are part of the solution and a general greater emphasis on public transport, walking and cycling. Just making cars cleaner will not resolve congestion issues. It was also suggested that gas buses could make a positive contribution to improving air quality, as they produce close to zero NOx emissions, are faster to refuel, and are cheaper to run than electric ones.</li> </ul>
<b>Mineral Resources</b>
<ul style="list-style-type: none"> <li>• Mineral supply cannot be assumed and it is essential that there is a sufficient supply of minerals to provide the infrastructure, buildings, energy and goods that Greater Manchester needs</li> <li>• Clay/shale is used for the manufacture of bricks, which are in high demand, especially for house building in the North West. Clay/shale is extremely beneficial to the region.</li> <li>• The properties of clay/shale are excellent from an environmental perspective, as they are very low in carbon and sulphur content, which helps to reduce the emissions created during the brick firing process.</li> <li>• Providing companies with a valuable local strategic resource such as clay/shale assists the wider construction sector and also provides employment.</li> <li>• Low carbon clay/shale can continue to play a large part in helping Greater Manchester become a sustainable and resilient place.</li> <li>• There is currently a lack of suitable land and infrastructure to meet current or forecast demand for mineral products. Mineral extraction, distribution and associated manufacturing to supply the construction industry are essential to achieve Greater Manchester's development aspirations.</li> <li>• The levels of growth and development proposed within the GMSF are likely to place significant demands on mineral resources and minerals infrastructure (such as aggregate rail sidings). Such infrastructure must be properly safeguarded.</li> <li>• In the absence of an updated Joint Minerals Plan for Greater Manchester the GMSF must explain clearly how it proposes to reconcile GM's development aspirations with the requirements of the Minerals Plan policies.</li> <li>• Concrete and masonry are durable building materials that can be used create energy efficient homes with low maintenance costs.</li> <li>• Concrete products deliver durability and utilise thermal mass to reduce the on-going energy and carbon requirements of heating and cooling over the lifetime of a building</li> <li>• Investments in transport links in the Greater Manchester area and other projects linked across the Northern Powerhouse should bring opportunities to improve freight transport capacity for minerals.</li> </ul>
<b>Coal Resources</b>
<ul style="list-style-type: none"> <li>• There is a need to identify areas of surface coal resource</li> <li>• The Greater Manchester area, except for Trafford, has been subject to past coal mining activity which will have left a legacy. Whilst most past mining is generally benign in nature, potential public safety and stability problems can be triggered and uncovered by development activities.</li> </ul>

- There are areas within the Greater Manchester area which contain surface coal resource. Site allocations should be assessed in advance of development taking place.
- There may be opportunities for local businesses arising from the policy; recycling should be done locally rather than shipping materials around the world
- Good ambition but concern that Greater Manchester has a long way to go to catch-up with leading cities elsewhere in the UK / Europe; concern that the solution needs to be bigger than just local; concern that the policy is not achievable; suggestion that greater detail on how the policy will be delivered is required
- Concern that it will lead to imposition of punitive schemes increasing costs of businesses/consumers; concern that it will reduce collection of waste at homes (leading to increased fly-tipping). People need incentives to change habits; retailers / manufacturers should be forced to stop using excess packaging
- Concern that industry, retail and domestic sectors not doing their best
- Need to encourage and educate with regards to repairing/reusing/repurposing – these are higher up the hierarchy than recycling
- Concern that new development will: result in greater need for waste disposal; lead to more inefficient use of resources.

### **Response to Comments**

Para 117 of the National Planning Policy Framework (NPPF) supports prioritisation of previously developed land. Policy GM-S 1 Sustainable Development policy sets out the preferred approach.

Additional reference included to consider land contaminated/stability issues when bringing forward previously developed sites, ensuring that appropriate mitigation and remediation is implemented to enable sites to be brought back into use effectively.

Provision of highspeed internet is covered by Policy GM-N 2.

The provision of critical and other infrastructures to support sustainable development is covered within Policy GM-E 1 Sustainable Places.

Justification text further strengthened with reference to the role of GMSF policy in contributing to sustainable development and the 2038 carbon neutrality target.

GMS-1 updated to include reference to sustainable design and construction techniques.

Additional evidence has been completed by the Tyndall Centre which considers the role of hydraulic fracturing and the impacts this may have on the carbon neutrality target for 2038. This also include consideration of the current and future energy mix for GM. Policy GM-S 2 will be updated to make additional reference to this and provide additional justification for the policy position.

Additional evidence has been completed by Currie and Brown/Centre for Sustainable Energy in relation to net zero carbon development (pathway approach, compliance with building regulations, costs, metrics and implementation). Policy GM-S 2 will be updated to make additional reference to this.

The definition of Carbon Neutrality for Greater Manchester was established by the Tyndall Centre Research '*Quantifying the Implications of the Paris Agreement for Greater*

*Manchester*, this has been referenced. Additional amendments have been made to Policy GMS-2 to explain what is meant by Net Zero Carbon for new development.

Policy GMS-3 makes reference to low carbon heat and energy systems.

Policy GMS-3 has been updated with further clarification provided on the '*presumption in favour*'.

NPPF Paragraph 57 advises that it is up to the applicant to demonstrate whether particular circumstances justify the need for a viability assessment at the application stage. This is also embedded within the approach for Policy GMS-3.

The policy wording within GMS-3 is considered flexible enough to allow a varied approach to low carbon heat and energy master planning, including consideration of technical and economic viability.

Policy GMS-4 seeks to ensure that Greater Manchester is resilient in a number of areas including preventing physical, social, economic and environmental challenges, expecting that new development should manage surface water runoff through sustainable drainage systems in line with greenfield run-off rates and supporting the retrofitting of existing buildings to enhance their resilience.

A Greater Manchester Resilience Strategy is being developed which will inform where a range of interventions will be required to improve the future resilience of the city region. More widely this will consider a range of issues that sit outside land use policy and planning to deal with chronic shocks and stresses that face the city region.

A number of the points raised in relation to the policy are addressed by other policies in the plan including Policy GMD-1 which seeks to ensure that new development is served by the infrastructure it needs, including healthcare, education and transport infrastructure. Policy GMS-7 has been amended to encourage sustainable design and construction methods in new development and reducing the potential impacts of new development on air quality are addressed in Policy GMS-6 through a variety of measures.

Policy GMS-5 covers a number of approaches to manage flood risk raised from the consultation including: using natural flood management approaches to prevent flooding by slowing the speed of water drainage; and expecting developments to manage surface water runoff through sustainable drainage systems, and on large sites with different phases of development, delivered in a holistic and integrated manner.

Policy GMS-5 has been amended to refer to the inclusion of water efficiency measures in new development.

Policy GM-D 1 covers the provision of allocation-wide infrastructure including foul and surface water drainage and clean water supply in an integrated manner.

Policy GMS-6 covers a range of measures to support improvements in air quality, including the potential impacts from new development and road infrastructure.

Outside of the GMSF, Transport for Greater Manchester have developed a 2040 Transport Strategy which focuses on the critical long-term challenges such as a rapidly growing and ageing population and climate change. It sets out long-term proposals to create a cleaner, greener, more prosperous city region through better connections and simpler travel.

The Greater Manchester Joint Minerals Plan was adopted in April 2013 and includes a set of policies which assist in the consideration of minerals planning applications, safeguards minerals resources which are likely to be required in the future and identifies areas within which new or expanded minerals extraction is likely to be suitable. Annual monitoring of minerals extraction and changes in likely future needs will inform whether and when an update of the joint minerals plan is required, including as a result of the growth in development set out in this plan.

Additional reference included within GMS-1 to consider land contaminated/stability issues when bringing forward previously developed sites, ensuring that appropriate mitigation and remediation is implemented to enable sites to be brought back into use effectively.

Policy GMS-1 and GMS-7 updated to include reference to sustainable design and construction techniques.

### 3.1.5. A Prosperous Greater Manchester

1,730 comments were made on this chapter. Concerns were raised that there was limited alignment between the Greater Manchester Economic Strategy and the location of employment sites. Many respondents questioned the approach used to calculate Greater Manchester’s employment floorspace needs however there was no consensus on the implications of this as comments were received stating that the GMSF both under and overestimated the need for employment land.

It was highlighted that the GMSF does not explicitly identify the scale of economic growth that it is seeking to deliver (in terms of job numbers or GVA) and concerns expressed that employment growth is not supported by sufficient housing provision

More detailed comments in relation to specific elements of the policies are set out below

<p><b>Land requirement:</b> The need for employment land has been over-estimated.</p>
<ul style="list-style-type: none"> <li>• There is adequate capacity to meet employment floorspace requirements on previously developed land.</li> <li>• Providing over 8 million square metres of employment floorspace is excessive and would only be necessary if around 350,000 new jobs were forecast to be created by 2037. The Greater Manchester Forecasting Model Accelerated Growth Scenario identifies around half this amount (183,689 new jobs by 2037).</li> <li>• Green Belt is mainly being released to cater for growth in logistic operations; these typically provide lower skilled, lower value employment opportunities, and fewer jobs per hectare than other industrial and warehousing uses such as advanced manufacturing.</li> <li>• The assumptions (i.e. plot ratios) that have been applied to translate floorspace figures into land requirements are flawed.</li> <li>• Over-provision can increase vacancy rates and lead to former industrial areas becoming blighted.</li> <li>• A more appropriate approach would be to phase a proportion of Green Belt sites, with their release being subject to a specified level of employment land take-up or demand transpiring during the plan period.</li> <li>• The GMSF fails to acknowledge that the overall requirement for industrial space has declined across Greater Manchester over the last 15 years and is likely to continue to do so (meaning vacant floorspace will become available through windfall sites).</li> <li>• The industry and warehousing floorspace requirement is over inflated; there are too many inflated upward adjustment factors built into the calculation (i.e. adjustments to account for the recession, margins of uncertainty, and flexibility of choice).</li> </ul>
<p><b>Land requirement:</b> The need for employment land has been under-estimated and additional provision should be made for office and industry/warehousing development.</p>
<ul style="list-style-type: none"> <li>• The proposed provision of at least 2,460,000 square metres of new office floorspace leaves a shortfall when compared to realistic future demand; our independent assessment shows a need for 2,777,000 square metres of office floorspace over the plan period (317,000 square metres more than GMSF’s).</li> <li>• The level of office supply provided for in the GMSF totals 2,892,705 square metres, leaving a 59,295 square metres quantitative shortfall compared to the 2,952,000 square metres office floorspace requirement identified within the Employment Topic Paper.</li> </ul>

<ul style="list-style-type: none"> <li>• This requirement figure rather than the ‘need’ figure should form the basis of Policy GM-P 4, i.e. 5,064,000 square metres of industry and warehousing floorspace, not 4,220,000 square metres.</li> <li>• Based upon GVA, there is a need for 6.1 million square metres of industry and warehousing floorspace; around 45% more than the minimum identified within the GMSF.</li> </ul>
<p><b>Distribution of employment land:</b> There’s limited alignment between the Greater Manchester Economic Strategy and the location of employment sites</p>
<ul style="list-style-type: none"> <li>• the identification of employment sites is welcomed in the north close to areas that have not benefited sufficiently from economic growth.</li> <li>• Whilst it is reasonable for the GMSF to seek to ensure that job growth is evenly spread to address economic disparities, the skills base and existing assets in the south of Manchester will be critical to driving improvements in productivity.</li> <li>• There is little acknowledgment of the role that the southern area of Greater Manchester will have in supporting long term economic growth (apart from Manchester Airport). Instead, the focus appears to be on developing the M62 North East corridor and the Wigan-Bolton growth corridor.</li> <li>• There’s no evidence that the deliverability of the strategic employment/mixed-use allocations within these two northern corridors has been assessed.</li> <li>• The distribution of employment floorspace is disproportionate, with almost three times more employment floorspace expected to come forward in major locations in the north compared to the south.</li> <li>• Ambitions to boost northern competitiveness are laudable, however the Framework should not constrain growth in the central and southern parts of Greater Manchester as a consequence.</li> <li>• The spatial distribution of employment land is not justified; a more sophisticated strategy should to be formulated to reflect the varying nature of employment land requirements across Greater Manchester (in terms of type, size and location), and which identifies the most appropriate locations for meeting identified requirements.</li> <li>• The GMSF does not sufficiently identify or analyse evidence of market demand (such as the locational and premises requirements of the sectors forecast to grow), or compare the available stock of land with these future requirements so that gaps and any over-supply can be identified.</li> <li>• A balance has to be struck between providing businesses with a range of locations to choose from, and the Framework’s strategy determining the pattern of employment development.</li> </ul>
<p><b>Employment projections:</b> The approach used to calculate Greater Manchester’s employment floorspace needs is questionable.</p>
<ul style="list-style-type: none"> <li>• The time period from which take-up/completion data has been extrapolated does not cover a full longer-term economic cycle.</li> <li>• Using past take up rates from between 2004/05 and 2017/18 to calculate employment land requirements is not robust.</li> <li>• The GMSF is unclear as to whether the employment land projections are based upon historic take-up (of existing and/or just new premises) or just past completions of new B1/B2/B8 floorspace (and whether those figures are gross or net). It also not clear whether unoccupied floorspace (whether new or previously occupied) has been accounted for.</li> <li>• No assessment is set out in the evidence base to gauge the extent to which the availability of suitable and viable employment land has constrained past take up.</li> <li>• GMCA should use the pre-recession trend as a baseline for calculating office floorspace needs, and use the most recent five-year period for industrial/warehousing space given the influence that e-commerce has had on demand and take-up.</li> </ul>



<ul style="list-style-type: none"> <li>• The economic outlook for industrial and warehousing is fundamentally better than the period from which the completions trend is drawn.</li> <li>• Use GVA growth to forecast future industrial and warehousing floorspace requirements.</li> </ul>
<p><b>Uplifts to past completion rates:</b> These are arbitrary and without justification</p>
<ul style="list-style-type: none"> <li>• The uplifts applied should be significantly greater to account for past losses of employment land to residential use.</li> <li>• The amount of employment floorspace the GMSF proposes is 55% higher than past completion rates suggest is necessary.</li> </ul>
<p><b>Commensurate housing provision:</b> Employment growth is not supported by sufficient housing provision</p>
<ul style="list-style-type: none"> <li>• An under-provision of homes will result in an insufficient local labour supply; leading to unsustainable levels of inward commuting; further pressure on the regions road and public transportation networks, and increases in per capita carbon emissions.</li> <li>• The Greater Manchester Forecasting Model suggests that around half of new employment from 2019 onwards will be created by firms in the high skill, high productivity sectors of business, i.e. finance and professional services, and the creative and digital industries. There is therefore a significant mismatch between the skills of the available resident population and those needed to underpin and drive economic growth.</li> <li>• The assumptions made about the increased participation of the existing resident population are unrealistic; existing residents will not have the necessary qualifications and skills to fill the roles created by the sectors forecast to grow; inward migration will therefore be necessary.</li> <li>• The GMSF has to provide the type of housing that employees from these growth sectors will demand and desire.</li> <li>• Housing of the wrong type and in the wrong locations will fail to attract skilled workers and will therefore constrain economic growth.</li> <li>• GMCA are hoping that labour demands will be met without sufficient housing having to be built.</li> </ul>
<p><b>Econometric forecasts:</b> The GMSF does not explicitly identify the scale of economic growth that it is seeking to deliver (in terms of job numbers or GVA).</p>
<ul style="list-style-type: none"> <li>• Both the Baseline and Accelerated Growth Scenario (AGS) forecasts within the Greater Manchester Forecasting Model (GMFM) are significantly below the rate of job growth delivered in Greater Manchester over past years; the GMSF is therefore predicated upon a significant decline in job growth (an average growth of 0.4% - 0.6% per annum up to 2037), compared to 0.8% over the last 10 years, i.e. the period that included the 2008 financial crisis and averaged 0.97% between 2011-2016.</li> <li>• GMCA should plan for an annual job growth of at least 0.8% to 1.0% per annum.</li> <li>• The GMCA forecasts job losses in four of the 10 GM authorities – Oldham, Rochdale, Tameside and Wigan, undermining the ambition of boosting northern competitiveness.</li> <li>• The Northern Powerhouse Independent Economic Review forecasts an additional 100,000 jobs over and above the GMFM Accelerated Growth Scenario (AGS).</li> </ul>
<p><b>Employment land baseline supply:</b> The evidence suggests this is mainly poor quality and heavily constrained (preventing sites from being used effectively).</p>
<ul style="list-style-type: none"> <li>• The vast majority of the office supply (88%) is derived from previously developed sites; without a detailed assessment it is not clear whether such sites are suitable, viable or attractive to the market.</li> <li>• The GMSF does not appear to have taken the quality of the employment land baseline supply into account, or assessed its ability to cater for future demand.</li> </ul>

- No analysis has been provided to assess the impact that the proposed housing strategy will have upon the baseline supply of employment land.

### **Response to comments**

#### Land requirement

Further evidence has been produced in relation to the employment land demand over the life time of the plan period. The evidence shows that the demand for Industry and Warehousing land is for over 4million sq m of land to be released for development up to 2037. The existing land supply is just under 2 million sq m therefore there is a clear shortfall in land supply. This has been supplemented to just over 4 million sq m by the selected release of sites outside the urban area, in line with the overall spatial strategy and the site selection methodology. In terms of demand for office floorspace, the evidence shows a need for over 2 million sq m of new office space up to 2037. Although the existing land supply is capable of meeting this demand, a very small amount of additional land (less than 21,500 sq m) is identified within the plan to be released from the Green Belt for the development of a Medipark in south Manchester adjacent to Wythenshawe Hospital and close to Manchester Airport

Further evidence has been produced in relation to the employment land demand over the life time of the plan period. It is appropriate for the overall land supply targets set out in both GMP3 and GMP4 to be based on the employment land need figures, derived from the evidence base. The land supply data set out in tables 6.1 and 6.2 (and on MappingGM) demonstrates that sufficient land has been identified over the course of the Plan to meet this need.

#### Distribution of employment land

The vision, objectives and spatial strategy contained in the GMSF are guided by the Greater Manchester Strategy, in fact they share a common vision. The economic strategy in GMSF complements that within the Local Industrial Strategy. The strategy maximises the potential of key growth locations across the conurbation, which collectively meet the strategy. These locations range from core conurbation areas such as the City Centre, the Quays and Trafford Park to new areas that will boost the competitiveness of the north, such as Northern Gateway and locations such as the Manchester Airport Enterprise Zone which will help to sustain the competitiveness of the south

#### Employment projections

Unlike with calculating housing need, there is no standard methodology for calculating employment land demand. However the approach followed in the employment land demand paper is not unique. There is evidence that past completions have been constrained by the lack of suitable sites resulting in Greater Manchester being unable to compete for some major occupiers. When combined with the need to secure a significant increase in the quality of accommodation across the city-region to respond to evolving business requirements and increasing globalisation, the identified demand and therefore land supply is considered to be appropriate.

#### Uplifts to past completion rates

It is considered that appropriate adjustments have been made in relation to employment land demand figures to take account of past under delivery and the need to have sufficiently attractive sites and premises to meet the overall ambitions of the Greater Manchester Strategy. Further details are provided in the employment land demand paper.

#### Commensurate housing provision

The housing need has been calculated using the standard methodology as anticipated by NPPF. The GMSF identifies a range of new housing sites, in a variety of locations. The

varied mix of sites, supported by the necessary infrastructure will provide the right level and mix of homes needed to support the economic growth.

#### Econometric forecasts

Unlike for housing, there is no prescribed method for identifying the employment land need, however the method used in the employment land demand paper is considered to be appropriate. The GMSF is one of the ways that Greater Manchester aims to increase the prosperity of local residents through making a full contribution to rebalancing the national economy. In this way Greater Manchester will be able to tackle historic disparities across the city-region

#### Employment land baseline supply

The level of land supply identified is sufficient to meet the employment land demand up to 2037. The level of need has been calculated to take account of the need to secure a significant increase in the quality of accommodation across the city-region to respond to evolving business requirements and increasing globalisation, the identified demand and therefore land supply is considered to be appropriate. Therefore supplementing the existing land supply for industry and warehousing in the way that the GMSF and the level of office floorspace available, it is considered that sufficient land has been identified

### **3.1.6. Homes for Greater Manchester**

There were 3,322 comments received in this chapter. Many respondents commented on the methodology used to calculate Local Housing Need. Some respondents were of the view that the Government standard methodology should not be used, that the 2016 Sub National Household Projections should be used or that Greater Manchester should calculate its own housing need, whilst others were of the view that the Government methodology provided a starting point but that Greater Manchester's need was higher than the LHN as set out in GMSF.

Some respondents were of the view that there is more than one housing market area within Greater Manchester and treating it as one will lead to an under-provision of homes within certain districts. Concerns were raised that the overall need for affordable housing will not be met through the GMSF, the GMSF does not provide an adequate range of dwelling types and sizes to meet the needs of different groups in the Greater Manchester community and that the proposed housing densities are inflexible and unrealistic.

Responses were received on the supply of housing land, with some of the view that it will fail to deliver the overall housing requirement or meet the local housing needs of each respective district. Some respondents considered that each district should meet its own housing needs.

Concerns were raised around the deliverability of the proposed housing supply and the view expressed that a larger buffer than proposed should be identified as a contingency to protect against the likelihood that sites under construction or with planning permission do not deliver as anticipated or at all.

Some respondents considered that the GMSF should plan to meet Greater Manchester's housing needs evenly throughout the plan period, not towards the end of it.

More detailed comments in relation to specific elements of the policies are set out below

**Housing Need:** Planning for housing must be based on the latest evidence, and this means the 2016-based household growth projections should be relied upon.

- The overall GMSF housing need numbers are too high; the ONS revised their household growth projections down in 2016; these result in Greater Manchester having a housing need of 154,000 homes as oppose to the projected 201,000.
- If housing need was calculated using the 2016-based household growth projections, and adjusted to reflect realistic economic growth, then less Green Belt land would be needed for housing and jobs.
- The standard method for assessing local housing need (LHN) is fundamentally flawed as it is based on projections rather than forecasts; projections do not take account of Government policy, i.e. the United Kingdom's decision to exit the European Union and the effect this will have upon net migration and household growth projections.
- GMCA should use an alternative approach to calculate local housing need, one that uses the latest evidence and is underpinned by more realistic assumptions about future demographic growth.
- Housing need should be met by bringing empty properties back into use and incentivising landlords to let/sell the properties they own but have chosen to leave vacant.

**Housing Need:** The annual need for 10,580 dwellings per annum (201,000 up to 2037) does not reflect the full objectively assessed needs of Greater Manchester (actual housing need is higher than Government's standard method indicates).

- The GMCA have not taken sufficient account of any factors that would have led to a higher housing need figure being calculated, e.g. prospective housing deals and planned strategic transport infrastructure improvements.
- The standard method for assessing local housing need provides a minimum starting point in determining the number of homes needed in an area. The method does not attempt to predict the impact of changing economic circumstances on housing need.
- The housing need figure should be further uplifted to support economic growth and increase affordable housing delivery.
- GMCA have interpreted the minimum annual housing need figure as the housing requirement, rather than as the first step in a process of deciding how many more homes actually need to be planned for (the housing requirement).
- The Framework should have explained the relationship between the local housing need figure and the housing requirement figure (i.e. how LHN was translated into a housing requirement figure for strategic policy-making purposes).
- The GMSF is unclear about the exact housing requirement; it appears as if the requirement (201,000) is slightly lower than assessed need (201,077).
- Housing need has not been assessed prior to, or separate from, considering land availability and how much of the overall need can be accommodated outside Green Belt.
- The level of housing proposed will not be sufficient to accommodate the workforce created through the jobs growth forecast.
- The GMSF is planning for fewer homes in the hope that labour needs will be met by existing residents, i.e. through increased rates of participation and residents working longer. This assumes that existing residents hold the qualifications and skills required by the sectors forecast to grow.
- Economic growth will fuel an increase in household formation rates by providing younger people with a better prospect of accessing the housing market.
- The previous objectively assessed need figure of at least 227,200 new homes over the plan period was a more appropriate assessment of local housing need.
- Household projections do not take account of how many people may want to form new households, and are not a measure of how many houses would need to be built to meet housing demand. Household projections simply show what would happen if past trends in

<p>household formation continued. They do not take account of where homes have been needed in recent years but have not been available, such as in Trafford and Stockport.</p> <ul style="list-style-type: none"> <li>• Building fewer homes in Greater Manchester than needed has prevented households from forming, which has in turn lowered the future household projections for Greater Manchester, misrepresenting and underplaying Greater Manchester’s actual housing need.</li> <li>• The 2014-based projections are calculated on a trend period which experienced low levels of housing development (5,000 units pa); which inevitably constrained household formation. The Framework anticipates there will be around 9,200 housing completions on average up until 2023 and 11,070 from 2024, meaning future household projections will be far higher than what is being planned for in the GMSF. GMCA should therefore be planning for a greater level of homes than past trends would suggest are needed.</li> <li>• The level of development proposed in, particularly in areas such as Stockport and Trafford, is too far below local housing need to be justifiable.</li> <li>• Although recent completions have been substantially below what is needed in areas such as Stockport and Trafford, there is no evidence to suggest that this has caused people to move to northern districts with lower house prices.</li> <li>• There is no quantitative assessment of the future need for care facilities and student accommodation.</li> <li>• Although the housing requirement is being treated as a minimum, rather than a cap, it must be expressed as a minimum annual requirement within the policy.</li> <li>• The GMSF should aim to allocate land with the capacity to deliver in the region of 12,500 to 15,000 new homes per annum rather than 10,580. This level of housing provision would be more commensurate with the level of economic growth advanced by the plan</li> </ul>
<ul style="list-style-type: none"> <li>• <b>Housing Market Areas:</b> There’s more than one housing market area within Greater Manchester</li> </ul>
<ul style="list-style-type: none"> <li>• The GMSF seeks to justify Greater Manchester as one strategic housing market area, primarily based upon the level of self-containment that exists both in terms of home moves and travel to work patterns across the wider city region, however no analysis is presented to substantiate this conclusion.</li> <li>• Treating Greater Manchester as a single housing market area will lead to an under-provision of homes within certain districts.</li> <li>• Relying on certain districts to meet the housing needs of other district’s (without accounting for house search/move patterns and travel to work flows across Greater Manchester) could result in the housing needs of workers employed in those ‘other’ districts not being provided for.</li> <li>• The GMSF correctly acknowledges that there are significant differences in housing demand and supply across different districts, which affects house prices and rates of change in house prices.</li> <li>• Despite national planning guidance outlining that housing market areas can be defined by analysing the key functional linkages between the places where people live and work, and the relationship between housing demand and supply across different locations (using house prices and rates of change in house prices), the GMSF still contends that Greater Manchester is a single housing market area.</li> <li>•</li> </ul>
<ul style="list-style-type: none"> <li>• <b>House Types:</b> The GMSF does not provide an adequate range of dwelling types and sizes to meet the needs of different groups in the Greater Manchester community.</li> </ul>
<ul style="list-style-type: none"> <li>• Apartments will not satisfy the demands of Manchester’s growing population for larger family homes.</li> <li>• The GMSF is over-reliant on the delivery of apartments. This will result in a significant over-supply of apartments and an under-supply of houses; in direct conflict with demographic and market evidence.</li> </ul>

- The evidence base for the GMSF does not identify that 60% of housing need is for apartments and the GMSF's household projections wrongly assume that past trends of households forming within apartments will continue. GMCA should consider alternative forecasts that are less likely to translate into the same level of demand for apartments.
- The GMSF underplays the need for family housing in order to limit the release of land suitable to meet those needs (i.e. greenfield and Green Belt sites).
- The GMSF fails to plan for the retention of the currently apartment dwelling city-centre based workforce.
- The mix and distribution proposed ignores the evidence about the shortcomings of the current housing stock and the pressing need to broaden the choice and range of homes available, i.e. by providing larger family housing in locations that will attract and retain skilled workers.
- A relative oversupply of apartments will make family homes less affordable (constraining the supply of family housing will compound competition for family homes in desirable areas, thereby driving up prices, and forcing skilled workers to leave Greater Manchester in order to access affordably priced family housing within a reasonable commuting distance of their place of work).
- It is highly likely that the current trend of migration to Cheshire East and High Peak will therefore continue as people look for larger executive homes in attractive locations.
- Giving preference to using previously developed land to meet housing needs will inevitably lead to a concentration of high-density flatted developments.
- It is essential that housing quantity is not at the expense of design quality.
- Affordable housing needs should be met on-site to help create mixed and balanced communities.
- The GMSF should be allocating more greenfield sites in areas capable of meeting the housing type needs of current and future families (i.e. in strong housing market areas that comprise lower density neighbourhoods).
- The ambition to accommodate smaller households, families, and an ageing population in apartments is not based on any reasonably justifiable evidence.
- A range of suitable house types must be provided if our ageing population is to be incentivised to downsize and free up larger properties for family occupation.
- Ensure that there is the offer to older people to remain within their neighbourhoods and include age friendly housing on all new developments so that the people who move in now can have the opportunity as they age to move within their local community
- For an ageing society a wide range of housing options will be needed across both private and social housing sectors, from retirement properties, to supported housing options such as extra care, to innovations such as co-housing
- Older people are more likely to be living in non-decent homes. Given the proportion of older stock across GM, it is important that this is addressed within the GMSF, working with districts to target these poor quality homes that have such a detrimental effect on people's health
- Whilst there is reference to the rapid growth in the number of older people living in GM over the plan period, the remainder of the GMSF pays little cognisance to this in prioritising investment in homes and services for this demographic.
- The commitment to Part M (2) of building regulations as new minimum accessibility standards are important steps in ensuring that new homes in the city-region will support ageing in place, and specific commitments to affordable older people's accommodation in a number of the development sites is a welcome acknowledgement that housing inequalities are not limited to younger people.
- There was also support that the GMSF recognises that high quality, 'age-friendly' neighbourhoods are important in creating sustainable communities that enable people to start, live and age well

<ul style="list-style-type: none"> <li>• Homes should be built to a minimum standard but it is hoped that Greater Manchester would be more aspirational than the National Design Space Standards which do not include adequate storage or circulation space. There is a real opportunity to create a ‘GM Housing Standard’, working with local housing providers and developers.</li> <li>• The GMSF can only introduce nationally described space standards and/or optional requirements if they are evidenced in accordance with National Planning Practice Guidance.</li> <li>• Overall the GMSF must plan for enough homes, of the right type, in the right locations.</li> </ul>
<p><b>Housing Density:</b> The proposed housing densities are inflexible and unrealistic.</p> <ul style="list-style-type: none"> <li>•</li> </ul>
<ul style="list-style-type: none"> <li>• Density ranges are distorted by the proportion of development that is expected to be delivered as apartments within city and town centre locations.</li> <li>• The proposed densities are not considered achievable once associated uses, including access roads within sites, private garden space, car parking areas, incidental open space, landscaping, and children’s play areas, have been accounted for.</li> <li>• The density policy should be flexible enough to allow proposals that are responsive to site specific circumstances.</li> <li>• It is questionable whether sale values on marginally viable brownfield sites will support the cost of building more densely.</li> <li>• Density assumptions have led to an overestimation of the level of development that can be yielded from sites identified within the baseline housing land supply. In turn this has led to an under-estimation of the amount of housing needing to be allocated on greenfield Green Belt land.</li> <li>• Space standards are less likely to be achieved within the parameters of the density policy.</li> <li>• Open space provision should not be compromised in order to achieve higher densities.</li> </ul>
<p><b>Housing Supply:</b> The supply of housing land will fail to deliver the overall housing requirement or meet the local housing needs of each respective district. (The GMSF must supply housing that people actually need and can afford, in areas where they will want to rent or buy).</p> <ul style="list-style-type: none"> <li>•</li> </ul>
<ul style="list-style-type: none"> <li>• The aim of the GMSF must be to boost northern competitiveness in its own right, not by neglecting housing needs elsewhere in terms of the overall number and type of properties to be supplied.</li> <li>• The cumulative housing supply for the northern districts exceeds minimum need by just 0.1% (for example there are no new family housing developments in Bolton). This is insufficient if the GMSF’s objective of boosting northern competitiveness is to be achieved, particularly given that certain northern districts are forecast to experience job losses.</li> <li>• Relative to existing housing stock, the level of housing supply proposed within southern districts is actually higher than northern districts; undermining the strategy to boost northern competitiveness.</li> <li>• As a minimum the housing supply proposed should meet full standard method-based housing need in each respective district, regardless of any planned over provision in areas where the GMCA is seeking to diversify local housing markets and stimulate economic growth.</li> <li>• To seek to constrain supply within the strongest housing market areas and instead rely on weaker market areas to achieve that delivery is illogical and unsound.</li> <li>• The GMSF is relying on sources of housing supply that have consistently failed to deliver and that could have already come forward (prior to the GMSF) had they been as developable and deliverable as the GMSF now claims they are.</li> <li>• There is simply not enough suitable, viable and available brownfield land to meet Greater Manchester’s housing needs to the extent that is being proposed through the GMSF.</li> </ul>



- Whilst it is appropriate for the baseline land supply, site availability, suitability, and sustainability, to influence the spatial distribution of development, this must be correlated to the areas with the greatest housing need, unaffordability, viability, and likelihood of delivery. The spatial pattern of housing distribution does not align with these considerations.
- Housing supply will barely keep pace with the rate of household formation (and will most likely be overtaken by it).
- The GMCA needs to set out clearly when each of the allocated sites will start to deliver housing within the plan period (and at what rate per annum).
- National planning policy requires planning authorities to identify land to accommodate at least 10% of their housing requirement on sites no larger than one hectare; GMCA have identified nearly 32%. This scale of delivery from small sites is unlikely to be achievable without a significant increase in small to medium sized developers, and will also compromise affordable housing delivery.
- The supply of large numbers of new homes can often be best achieved through planning for larger scale development; major strategic sites can yield the critical mass of development required to financially support the provision of new transport infrastructure, schools and community facilities in advance of occupation, as well as affordable housing

**Housing Delivery:** There is a lack of certainty around the deliverability of the proposed housing supply (both in terms of the rate of delivery anticipated and the total amount of completions assumed).

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- The GMSF incorrectly assumes that all the sites that make up the baseline housing land supply will be implemented and delivered in full and at the completion rates anticipated.
- The suitability, availability and achievability of the baseline housing land supply remains untested; i.e. in accordance with national planning guidance with respect to viability, constraints (including their potential to be mitigated), potential impacts, legal/ownership impediments, attractiveness to market, and landowner intentions.
- Overall there is a lack of robust evidence to provide sufficient certainty that the baseline land supply and housing allocations proposed will deliver as projected.
- There has been little if any engagement with developers, landowners and other delivery partners, despite the requirement for their involvement at the earliest stages of the plan making process.
- Site yields have been overestimated; insufficient regard has been given to physical, environmental and financial constraints.
- A proportion of the supply is currently in alternative use, for example as employment floorspace, and is not therefore available for residential development.
- The GMSF should provide a larger buffer than proposed (i.e. additional total deliverable housing site capacity over and above the housing requirement) as a contingency to protect against the likelihood that sites under construction or with planning permission do not deliver as anticipated or at all; that windfall levels are lower than expected, future demolitions/changes of use/conversions have been under-estimated, existing allocations remain unimplemented, sites with expired applications remain unconsented, and the GMSF allocations are not delivered in line with expectations. The total land supply figure of 218,549 (9% greater than minimum local housing need) is insufficient to protect against the eventualities outlined above.
- The reliance on brownfield land and town centre sites makes it far more likely that the rate of lapsed planning permissions will be higher than typically seen elsewhere and that delivery will be delayed or fail to materialise at all (due to the cessation of existing uses, and complications with land assembly, site clearance and remediation).
- The GMSF does not provide sufficient clarity about the scale or type of development that is expected to come forward in each town centre; or any evidence about its deliverability.

- Around 29% of the housing requirement will be delivered in the core growth area (principally as apartments); the GMSF is thereby dependent on a small geographic area and segment of the housing market to deliver a significant proportion of Greater Manchester's future homes.
- The GMSF assumes unprecedented levels of brownfield land delivery and that the rates assumed will be sustained throughout the plan period.
- There is a significant over-reliance on brownfield sites with no planning application status being deliverable.
- Unallocated and/or unpermitted sites should not be considered deliverable (i.e. available and suitable with housing achievable within 5 years), and allocated/permitted sites should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years.
- Large and complex Green Belt releases will make demonstrating a five year supply of deliverable housing sites more challenging. This can be addressed by allocating more smaller deliverable greenfield Green Belt sites that are within the control of a single housebuilder and do not require substantial infrastructure or public funding support.
- The GMSF is unclear whether the five year housing land supply requirement will be applied on a district or GMCA basis.
- Each Greater Manchester local planning authority must maintain a sufficient supply of deliverable housing sites (against its five year housing supply requirement including appropriate buffer) throughout the plan period; individual authorities should not rely on other GM authorities to deliver housing on their behalf.
- The GMSF's approach to housing delivery is driven by politics rather than evidence.
- The expectations for delivery on brownfield land must be realistic, and reflect what developers will actually have the capacity and desire to deliver.
- The GMCA is proposing to deliver an excessive supply of apartments simply in order to achieve higher densities and maximise brownfield land usage, thereby minimising the amount of greenfield and Green Belt loss necessary to meet the housing requirement. Although laudable, this will nevertheless be to the detriment of families wanting to live in houses located outside town and city centre locations.
- The GMSF significantly overestimates the capacity and deliverability of the baseline supply of housing land, and therefore significantly underestimates the level of Green Belt housing allocations required.
- Proposing to deliver homes (of a type and size) that will not match housing needs, in districts where demand and growth has generally been lower, whilst restricting growth in locations where demand has historically been higher, is considered unsound and will, inevitably through a lack of consents, lead to a significant under-delivery of housing, acute affordability issues, and planning by appeal (due to district's being unable to demonstrate a five year supply of deliverable housing sites and the GMSF's policies for determining residential applications being deemed out-of-date).
- Make provision for the release of 'reserve Green Belt sites' (with release being subject to a specified level of under-delivery having occurred during the plan period).

**Affordable Housing:** The overall need for affordable housing will not be met through the GMSF

- The adjustment applied to local housing need to take account of affordability (an extra 1,218 homes per annum) will barely have an effect on the affordability of homes in Greater Manchester.
- The affordability adjustment has been formulated to address the affordability of areas where house prices are greater than four times local average earnings (areas such as Stockport, Trafford and Bury). However, the GMSF disregards this and actually apportions less housing to these areas than they need as a minimum (i.e. the extra 1,218 homes per

year are planned to be delivered in more affordable districts where new housing is needed less).

- The affordability ratio (house price to earnings) within each GM authority continues to worsen year after year placing greater pressure on the ability of the city's population to form households.
- Past rates of household formation were artificially suppressed by the failure to build enough homes within Greater Manchester that people could afford.
- Setting a housing requirement that goes no further than the standard method only serves to embed and compound current affordability issues (particularly in Bury, Trafford and Stockport where housing needs will be under-provided for).
- Projections of affordable housing need should reflect new household formation, the proportion of newly forming households unable to buy or rent, and an estimate of the number of existing households falling into affordable need.
- GMCA should look at the current affordable housing stock and assess whether it matches current and future affordable housing needs; and plan for any deficit to be met. In the last 5 years the majority of affordable housing was delivered by housing providers as opposed secured through planning obligation agreements.
- The Strategic Housing Market Assessment (SHMA) identifies a total net annual affordable housing requirement of 4,832 dwellings per annum across Greater Manchester. This represents a significant proportion of the total annual housing requirement (46%), however the GMSF only plans for a minimum of 50,000 affordable homes (equating to just 25% of the total annual housing requirement).
- The 50,000 target falls short of the 85,000 households who were on a local housing register in 2016/17.
- It will be challenging to achieve any affordable housing on previously developed land given cost constraints and limited viability headroom (especially after the significant additional policy burdens proposed by the GMSF are accounted for).
- There is no evidence to demonstrate that 50,000 affordable homes are viable and deliverable across the sources of housing land supply identified.
- Almost 7% of the overall housing supply is comprised of sites yielding less than 10 units, which is below the threshold at which affordable housing contributions can be sought.
- It is likely that greenfield land will have to deliver a greater proportion of affordable homes to compensate for the lack of delivery on previously developed land.
- In order for Manchester's affordable housing need to be met in full it will be necessary to plan for at least an additional 2,200 affordable homes per annum across Greater Manchester (and around 243,000 homes in total).
- The GMCA should use Government's definition of affordable housing (as set out in national planning policy).
- A higher overall housing requirement would increase the prospect of delivering 50,000 affordable homes (because as it stands every site will have to deliver 25% affordable housing on average). Increasing the overall housing requirement would lower that proportional target, making it more achievable on a site by site basis.
- Proposing family homes in areas of strong demand would support the delivery of affordable homes
- Allocating land to build more homes will not lower house prices in itself, as prices are determined by the level of supply released for sale and the rate at which the housing market is able to absorb that supply (which is controlled and dictated by major housebuilders and the inflated prices they set for their homogenous housing products).
- Place affordable housing in areas with the most potential for future employment

**Safeguarded Land:** No safeguarded land is proposed (except for a marginal amount within Trafford).

<ul style="list-style-type: none"> <li>• The post-2037 supply identified within the GMSF is insufficient to meet the longer-term development needs of Greater Manchester well beyond the plan period.</li> <li>• The ‘brownfield preference’ strategy proposed by the GMSF is supported, but is likely to exhaust the supply of developable land within the urban area, meaning its contribution to meeting post-2037 housing needs is likely to be limited.</li> <li>• Safeguarded land should be identified to ensure consistency with national policy and to establish Green Belt boundaries that will endure well beyond 2037.</li> </ul>
<p><b>Stepped Housing Requirement:</b> The GMSF should plan to meet Greater Manchester’s housing needs evenly throughout the plan period, not towards the end of it.</p>
<ul style="list-style-type: none"> <li>• The need for housing within Greater Manchester exists now and will continue to rise throughout the plan period.</li> <li>• The introduction of a stepped housing requirement will increase pressure on the housing market, worsen affordability, and defer meeting needs until later on in the plan period.</li> <li>• The stepped approach to housing delivery will lead to large deficits in each district’s provision that will be far too great to address concurrently during the latter stages of the plan period.</li> <li>• The GMSF proposes the delivery of just 9,200 dpa (dwellings per annum) in the first five years of the plan period (13% below the minimum ‘starting point’ housing need figure of 10,580).</li> </ul> <p>GMCA have proposed a stepped trajectory to increase the chance that each respective district will be able to demonstrate a five year supply of deliverable housing sites. Stepped requirements are only appropriate if there is to be a significant change in the level of housing requirement between emerging and previous policies, and/or where strategic sites will have a phased delivery or are likely to be delivered later in the plan period.</p>
<p><b>Response to comments</b></p> <p>Housing Need</p> <p>As expected by NPPF the housing need figure used in the GMSF 2020 has been derived using the standard methodology provided in NPPG for calculating local housing need. Government wants local authorities to have a clear and consistent understanding of the number of new homes needed in an area. Therefore, they devised a standard methodology to calculate a figure for ‘local housing need’. The method was published in early 2019 and sets out the approach for calculating the minimum housing need for an area. The total housing need figure for Greater Manchester is worked out district by district and added together to give a Greater Manchester total figure. Under the current methodology the overall annual housing need for Greater Manchester is 10,534 homes per annum. Greater Manchester authorities have decided to share this total housing need figure between the districts using the overall spatial strategy in the Greater Manchester Spatial Framework process</p> <p>As expected by NPPF the housing need figure used in the GMSF 2020 has been derived using the standard methodology provided in NPPG for calculating local housing need. The total housing need figure for Greater Manchester is worked out district by district and added together to give a Greater Manchester total figure. Under the current methodology the overall annual housing need for Greater Manchester is 10,534 homes per annum. Over the lifetime of the GMSF (2020 – 2037) the total housing need for Greater Manchester is 179,078 homes. Further evidence regarding Greater Manchester’s overall housing need is provided in the Strategic Housing Market Assessment (SHMA) 2020. Additionally further evidence has been produced in relation to the employment land targets within the GMSF and it is considered that sufficient housing land has been identified in the GMSF to meet Greater Manchester’s needs up to 2037. Greater Manchester authorities have decided to share this total housing need figure between the districts using the overall spatial strategy in the Greater Manchester Spatial Framework process. Through this process individual housing targets for each of the ten</p>

districts have been identified and sufficient deliverable land has been identified to meet these targets

#### Housing Market Areas

An update of the Strategic Housing Market Assessment has been published alongside the GMSF 2020. This provides full details in relation to defining the Greater Manchester housing market area. More than four out of every five households who move into a home in Greater Manchester already live there and almost nine out of ten working people who live in Greater Manchester also work in Greater Manchester. The document considers that whilst Greater Manchester has important and valuable relationships with neighbouring districts and further afield, it is reasonable to define it as a housing market area for strategic planning purposes.

#### House Types

The updated SHMA (2020) provides detailed evidence in relation to Greater Manchester's housing need. The GMSF sets out a very clear preference of using previously developed (brownfield) land and vacant buildings to meet development needs the supply of land and identifies sufficient land to meet Greater Manchester's housing need and to deliver a mix of size and type although the precise mix of dwelling type and size will be determined at the local level. The homes will be of good quality and design and will be accessible and adaptable and supported by amenities and necessary infrastructure

#### Housing Density

The GMSF seeks to use land as efficiently as possible and as such it introduces a density policy which properly seeks to deliver higher density development in the most sustainable locations. The density ratios proposed in the GMSF are considered to be realistic based on the land supply within these urban areas. Based on the assumptions made in the plan and the existing land supply, strategic viability evidence has been produced.

#### Housing Supply

Sufficient housing land has been identified in the GMSF to meet Greater Manchester's needs up to 2037. The land has been identified in a range of site sizes, predominantly on land within the urban area. Greater Manchester authorities have decided to share this total housing need figure between the districts using the overall spatial strategy in the Greater Manchester Spatial Framework process. Through this process individual housing targets for each of the ten districts have been identified and sufficient deliverable land has been identified to meet the overall need of Greater Manchester and to deliver the overall strategy. The GMSF sets out a very clear preference of using previously developed (brownfield) land and vacant buildings to meet development needs and therefore Greater Manchester has been lobbying the Government to secure funding to realise this ambition. As a result a number of schemes have secured funding from initiatives such as the Housing Infrastructure Fund and the Brownfield Land Fund

#### Housing Delivery

The GMSF 2020 represents the third round of consultation on the complete GMSF. In addition to these consultations, there has been engagement with developers etc. in the production of evidence such as the viability evidence. Past trends in completions up to March 2020 would suggest that housing delivery in Greater Manchester can keep pace with the rates anticipated in the GMSF. Over the plan period more than a 15% buffer has been applied to the land supply. This is considered to be sufficient to not only provide adequate flexibility of sites but also to take account of the proportion of sites in the early years that may face challenges due to their brownfield land nature, the potential uncertainties arising out of Covid-19 pandemic in the early years of the plan and to ensure that the Green Boundary can endure beyond the end of the plan period. Given the strategic nature of the GMSF, specific sites are not identified within the urban area, these would be allocated as appropriate within district local plans,

however the extent of the land supply can be seen on MappingGM which is where specific land supply data can be found for each district.

#### Stepped Housing Requirement

Introducing stepped targets is an appropriate mechanism to use in plan making. The factors for determining the stepped targets in Greater Manchester include the need to be realistic at the start of the plan period in terms of the level of masterplanning and infrastructure provision required for the larger more complex sites and also the need to take account of the challenges facing some of the urban land supply

#### Affordable Housing

The local housing need calculation (and therefore the affordability ratio) has been derived through applying the standard methodology. Further details in relation to housing need, including affordability can be found in the updated SHMA (2020) and the GM Housing Strategy sets out the approach to tackling the housing crisis. There are a variety of ways to deliver affordable housing. The emphasis in some parts of Greater Manchester may be on increasing the supply of social rented and in others shared ownership, affordable market rent and discount market sales may be appropriate. Although locally appropriate requirements will be set by each local authority, delivery of affordable housing has been taken into account as appropriate in the viability assessment work supporting this plan

#### Gypsy and Traveller Accommodation

The Greater Manchester authorities agreed to deal with matters relating to Gypsy and Traveller Accommodation through local planning documents, not a strategic document such as the GMSF

#### Safeguarded Land

A buffer of more than 15% has been identified in the land supply. This buffer will provide flexibility in terms of choice but will also contribute to the land supply beyond the plan period, meaning that the Green Belt boundary will endure beyond the plan period. Notwithstanding this, a policy has been included in the GMSF in relation to safeguarded land

### **3.1.7. A Greener Greater Manchester**

There were 5,725 comments received on this chapter. A landscape approach to biodiversity enhancement and spatial development was strongly supported. The policies around Green Infrastructure were also supported although greater clarification of terms used was requested. Some respondents were of the view that the approach set out in this chapter was undermined by the allocation policies.

The biodiversity net gain approach was supported however it was considered that the policy would be strengthened greater detail around if a clear target, or phased targets, to deliver net gain for biodiversity in any development (10% or greater), using the latest Defra metric was included.

The policy on Green Belt attracted a significant number of comments including that the GMCA should seek and gain from the Government changes to national planning guidance that support a Brownfield First approach before GMSF submitted for examination; all other sources of development land should be utilised, including brownfield land and contaminated land. before any land is removed from the Green Belt for development, and that the distribution of the removal of land from the Green Belt and allocation for development is not justified and is higher in some areas than others.

Comments were received that 'exceptional circumstances' had not been demonstrated for either removal of sites from Green Belt or addition of sites as new Green Belt and that development of Green Belt land will have adverse impacts upon biodiversity, heritage assets, water supply and increase traffic congestion, air pollution and flooding.

More detailed comments in relation to specific elements of the policies are set out below

<p><b>Landscapes</b></p> <ul style="list-style-type: none"> <li>• Strongly support a landscape approach to biodiversity enhancement and spatial development.</li> <li>• Welcome the policy's approach of seeking biodiversity net gain and landscape enhancement to be done in conjunction. Believe that the draft net gain policy should have a similar approach.</li> <li>• The net effect of the GMSF should be a substantial improvement in the ecological network of Greater Manchester and surrounds but cannot see this emerging from some of the current individual allocation policies.</li> <li>• Specific reference to tree planting is included as a specific point, based on the benefits highlighted by the Climate Change Commission for reducing CO2 levels and helping the UK meet current and future Carbon Budgets going forward</li> </ul>
<p><b>Green Infrastructure Network</b></p> <ul style="list-style-type: none"> <li>• A priority for the Green Infrastructure Network should be to look at deficiencies in the quality of biodiversity and access to nature and green, open space.</li> <li>• "Priority Green Infrastructure" needs to be clarified.</li> <li>• Biodiversity enhancement should not be traded-off against other environmental public goods that are easier to deliver.</li> <li>• Green Infrastructure should use native wildflower species except where changing climate, air pollution challenges and promotion of human health and wellbeing justifies other species.</li> <li>• Ecological functions of Green Infrastructure needs to be made clear.</li> <li>• Green Infrastructure mapping is more a map of ecology.</li> <li>• Need to avoid conflict between Green Infrastructure for recreation and Green Infrastructure for ecological purposes – they are not always compatible</li> <li>• Brownfield land has been blanket identified as suitable for development – several Sites of Biological Importance and even Sites of Special Scientific Interest are on brownfield land.</li> <li>• Take a natural capital approach to assessing the value of existing Green Infrastructure on each allocation; it can help flooding, heat moderation, exposure to air / noise pollution and the physical and mental wellbeing of future users.</li> <li>• Existing key Green Infrastructure should be retained, integrated and protected within any future development plans and in particular established woodlands and landmark trees.</li> <li>• Increasing the use of canals and waterways for active travel needs to ensure that sensitive habitats and species are protected</li> </ul>
<p><b>River Valleys and Waterways</b></p> <ul style="list-style-type: none"> <li>• Support that open character is to be retained and that public enjoyment of river valleys and waterways will be promoted. It is right that the mosaic of semi-natural habitats, and areas of tranquillity are protected.</li> <li>• Importance role and special requirements of Canals needs more emphasis.</li> <li>• Contribution of watercourses / waterways in urban environment needs to be recognised</li> <li>• Should refer to safeguarding of the line of the Manchester Bolton &amp; Bury canal for restoration or as infrastructure.</li> <li>• Increasing the use of canals and waterways for active travel needs to ensure that sensitive habitats and species are protected.</li> </ul>
<p><b>Lowland Wetlands and Mosslands</b></p> <ul style="list-style-type: none"> <li>• Recommend an additional priority to create/expand this priority habitat across the whole of GM, rather than just around the single Nature Improvement Area</li> <li>• Emphasise carbon storage, importance to species and avoid inappropriate vegetation e.g. trees and hedgerows</li> <li>• 8.27 states that some sections of undeveloped mossland are considered appropriate for future development – this is disputed and should be deleted.</li> </ul>



<ul style="list-style-type: none"> <li>Expanding public access across the area should be managed in a way that avoids damage to sensitive habitats and disturbance to wildlife.</li> </ul>
<p><b>Uplands</b></p>
<ul style="list-style-type: none"> <li>Agree with policy and welcome new commitment to avoid Green Belt release in the uplands</li> </ul>
<p><b>Urban Green Space</b></p>
<ul style="list-style-type: none"> <li>The phrase “existing urban green space protected and enhanced in balance with other considerations” suggests economic considerations might be seen to outweigh such protections in some circumstances. Clarification should be given as to what is meant by “in balance with other considerations”.</li> <li>Urban Green Space statement of ‘an appropriate scale, type, quality and distribution of urban green space’ needs to be defined and targets established and cross-referenced to specific targets in the housing section.</li> <li>GMSF should clarify that once brownfield land has a value for green space, it should cease to be recorded as brownfield and should be given policy protection as an Urban Green Space.</li> <li>Urban Greenspace should be favourable to wildlife.</li> <li>Existing greenspaces should be enhanced through the development process.</li> <li>Canals should be recognised as having an important role as Urban Green Space</li> </ul>
<p><b>Trees and Woodland</b></p>
<ul style="list-style-type: none"> <li>Protection of Ancient and Semi-Natural Woodland needs to be stronger</li> <li>Requires a more nuanced approach about where it is, and where it is not, appropriate to plant trees.</li> <li>Tree planting should be avoided on grassland and pasture where priority bird species such as Lapwing and Skylark nest.</li> <li>Consider targeting tree planting in areas of greatest need</li> <li>Consider expanding specific policy on Trees and Woodland to include Hedgerows</li> <li>The draft Greater Manchester Tree &amp; Woodland Strategy and GM Tree Audit should be referenced with respect to any future decisions that may affect this tree cover</li> <li>Consider creating new woodlands on larger site allocations due to climate change resilience, biodiversity, physical and psychological benefits.</li> </ul>
<p><b>Green Infrastructure Opportunity Areas</b></p>
<ul style="list-style-type: none"> <li>Green Infrastructure Opportunity Areas are not adequately protected by allocations policies</li> <li>Similar to the Lower Medlock valley, recommend that the Irk Valley is included within the main policy given the significant ambitions that Manchester City Council has around its Northern Gateway regeneration area seeking to deliver a new park around the River Irk and the potential improvements that will be provided to the priority Green Infrastructure network. The Environment Agency is also developing a vision strategy for the River Irk to identify appropriate actions to work with partners and address catchment issues for Water Framework Directive objectives.</li> </ul>
<p><b>Standards for a Greener Greater Manchester</b></p>
<ul style="list-style-type: none"> <li>The wording ‘green infrastructure’ should be replaced with ‘accessible natural green space’ to avoid confusion.</li> <li>Strongly support the standards proposed for a “Greater Manchester Green Factor”.</li> <li>Support policy but need to distinguish between the different types of green infrastructure</li> </ul>
<p><b>A Net Enhancement of Biodiversity and Geodiversity</b></p>
<ul style="list-style-type: none"> <li>Net “enhancement” rather than “net gain” is not in line with national policy</li> <li>Agree with the general principles of a Net enhancement of biodiversity and geodiversity, however would like to see:             <ul style="list-style-type: none"> <li>Robust evidence requirements to ensure the proposed mitigation hierarchy has been followed</li> </ul> </li> <li>Stronger requirements for the use of applicable native species in habitat creation</li> </ul>

- Suggest that a target for biodiversity net gain is set out in policy e.g. +10%.
- The proposed Greater Manchester Biodiversity Metric should be compatible the proposed Defra 2.0 metric, whilst potentially going further to ensure the best outcomes for species and habitats
- Disagree with use of DEFRA metric
- DEFRA metric is still too vague and reliant on lots of elements working together (which cannot be guaranteed to do so).
- Broadly agree but crucially important considerations are missing, namely:
- National policy (net gain) requirements are met;
  - Existing biodiversity assets are protected and enhanced as a first resort;
  - A positive impact on the integrity of ecological networks;
  - A positive impact on the recovery of priority species populations;
- No baseline for ecological network
- GMSF should require development to include features to enhance biodiversity e.g. swift bricks.
- Biodiversity enhancement policy is insufficient to cope with scale of loss due to development

#### **The Greater Manchester Green Belt**

- Land should not be removed from the Green Belt to be allocated for development
- Greater Manchester has enough brownfield land to accommodate the future jobs and housing growth identified.
- The GMCA should seek and gain from the Government changes to national planning guidance that support a Brownfield First approach before GMSF submitted for examination.
- A 'brownfield preference' approach, as described in the GMSF Overview document, will not provide the necessary protection for the current Green Belt.
- Proposed housing should be built on brownfield sites and at much higher density than proposed.
- Funding for brownfield site remediation must be found in the short to medium term, from either Central, Regional or local Council sources so that these sites are not left for future generations to deal with.
- Land of high value for agriculture should be the last to be allocated for development
- Existing sources of land must be used to meet housing need before Green Belt is used a variety of alternative sites put forward ranging from town center sites to brownfield sites.
- The distribution of the removal of land from the Green Belt and allocation for development is not justified and is high in certain areas
- Exceptional circumstances to justify removal of land from Green Belt and allocation for development has not been proven – housing need alone is insufficient to justify Green Belt release.
- Consideration of valid alternatives must be provided, including revision of evidence base methodologies. The current approach is not National Planning Policy Framework compliant (para 170)
- GMSF should include the terms of the exceptions test in more detail, especially to enable lay readers to consider whether current plans for strategic removal of land from the Green Belt are justified
- Policy terms “positive and beneficial use of the Green Belt” and “providing high quality green spaces that will support economic growth” are not within the National Planning Policy Framework , and we ask for more detail to what is actually meant.
- Green Belt only established in 1980s – changes now conflict with concept of permanence of Green Belt.
- Land should not be removed from Green Belt and allocated for development as this will lead to urban sprawl, conflicting with spirit and intention of national Green Belt policy.
- Development of Green Belt land will have an adverse impact on air quality and health and wellbeing.
- Development of Green Belt land will lead to more flooding.

- Green belt land should not be developed as it protects the water supply.
- Green Belt land should not be developed as it includes significant local biodiversity assets
- Building on our green spaces and Green Belt, which act as wildlife corridors and homes to huge variety of plants, animals, insects and birds, will have a negative impact on the environment. GMSF Allocation Species List from GM Ecology Unit includes 100's of Protected and priority species.
- All designated Sites of Biological Importance are removed from the allocated sites.
- All future large scale developments should sit outside of the existing priority green infrastructure.
- Development of Green Belt land will lead to loss of / adverse impact on heritage assets.
- Local transport network and infrastructure cannot cope with houses on the Green Belt.
- Proposed additional roads infrastructure will not solve current high levels of congestion on the main roads/routes and motorway network.
- Development of Green Belt land is not being supported by necessary infrastructure
- Green Belt land figures should be split into land that is publicly accessible for leisure use and land that is not - more of the Green Belt being lost is publicly accessible land, as it tends to be closer to urban areas.
- Smaller sites in Green Belt have been overlooked in favour of large sites; smaller sites should be considered.
- It is not appropriate to reclassify existing open space as Green Belt.
- Support the reduction in the amount of Green Belt proposed for development.
- Support further reduction in the amount of Green Belt land lost. If the housing requirement is adjusted to reflect realistic economic growth, and based on 2016-based household projections then the land needed for jobs and housing is much less
- Support the new Green Belt additions. Note that some parcels of new Green Belt have limited value to the public in terms of access.
- The new areas of Green Belt proposed in the revised GMSF will not have any protection given that proposals will remove the said same protection from current Green Belt.
- Objections to the proposed inclusion of land within the Green Belt.
- The plan does not identify enough safeguarded land to meet longer term development needs.
- Unwise to add land to the Green Belt when future growth is unclear. It might be wiser to safeguard this land to meet growth.
- Support release of green belt, although it has not gone far enough as there too much reliance on Manchester and Salford's brownfield land.
- The extent of land to be released from the Green Belt needs to be significantly increased to meet the growth needs of Greater Manchester. The current approach to Green Belt release will prove ineffective in meeting the needs of Greater Manchester and as such further exceptional circumstances exist for an increased Green Belt release.

**Response to Comments:**

- Positive support for this chapter and associated policies is noted.
- Agree with taking a landscape scale approach and have reflected via a reference to nature recovery strategies.
- Agree that brownfield land can be equality important for nature. This is why the Plan includes specific policies on urban green space and green infrastructure standards.
- Agree that the Green Infrastructure policies could be clarified and the policies have been amended, including a focus on natural capital.
- Agree that net "enhancement" should be replaced with "net gain" to ensure alignment with national policy.
- Have referenced the Greater Manchester Woodland Strategy
- Disagree that some sections of undeveloped mossland are considered inappropriate for future development as they are well-located to make a notable contribution to delivering

more balanced and inclusive growth. Such areas will only be developed where they are shown to be of limited ecological value and the development can be delivered without compromising the green infrastructure role of the wider area.

- Agree that canals have an important role as urban greenspace (blue space) and are referenced in the overarching Green Infrastructure policy and a specific policy on River Valleys and Waterways.
- The GMSF sets out a very clear preference of using previously developed (brownfield) land and vacant buildings to meet development needs. However, given the scale of development required to meet the needs of Greater Manchester a limited amount of development is required on greenfield and Green Belt land as it is critical to the delivery of the overall vision and objectives of the plan. The release of greenfield and Green Belt land has, however been kept to a minimum.
- The scale of development proposed in the GMSF appropriately meets the Local Housing Need and Objectively Assessed Need for Employment.
- The GMSF identifies a sufficient land supply buffer to ensure not only flexibility in choice for future development but also to ensure that the Green Belt boundary endures beyond the plan period. Additionally a new policy has been included in relation to safeguarded land.
- Additional evidence has been prepared in relation to the proposed changes to the Greater Manchester Green Belt boundary.
- The remaining Green Belt will continue to be protected through National Policy and the GMSF and evidence has been prepared to identify opportunities to enhance the beneficial use of the remaining Greater Manchester Green Belt.

### **3.1.8. A Greater Manchester for Everyone**

There were 1,870 comments received for this chapter. In general the policy approach was supported but comments were received around; the need to ensure that the GMSF was based on an appropriate level of up-to-date evidence about the historic environment; the need to support the demand for health and care services and education provision in areas of significant housing growth funding through developer contributions

More detailed comments in relation to specific elements of the policies are set out below

**Heritage Assets:**

- The Framework should be based on an appropriate level of up-to-date evidence about the historic environment.
- The specific gaps and issues that were highlighted during the previous consultation period have not been addressed.
- Before proposing site allocations, the National Planning Policy Framework requires an appropriate evaluation of the impact which the allocation of a site and the proposed level of development might have upon any elements (including setting) that contribute to the significance of a heritage asset.
- Heritage impact assessments should be prepared for each of the proposed allocations.
- These should consider potential impacts upon the significance of heritage assets and their setting, the appropriate type/quantum of development, its public benefit, and how any harm could be mitigated.
- Without this understanding of the historic environment of the area, and an assessment of the extent to which the significance or value of its heritage assets may be harmed or lost (or improved) by the GMSF proposals, GMCA cannot demonstrate that the objectively assessed development needs of the Manchester area will be met in accordance with the presumption in favour of sustainable development.
- Overall the GMSF should provide a clearer and more positive strategy for the conservation and enhancement of the historic environment, and one which is responsive to the heritage issues highlighted by supporting evidence.
- This evidence should establish how the historic environment contributes to the character, economy and quality of life of Manchester; and identify the issues and challenges it is/will be facing, and what opportunities the historic environment offers to remedy these and help deliver the objectives of the Strategic Framework.

**Health Care Provision**

- In areas of significant housing growth funding must be leveraged through developer contributions to support the demand for health and care services.
- The need for developers and plan makers to work with health care providers cannot be underestimated, and planning policies and site assessments should be informed by ongoing engagement with them.
- It is imperative that Section 106 and Community Infrastructure Levy (CIL) payments are collected to help deliver and support health services in dealing with the cumulative demands arising from smaller residential developments.
- Where health care providers are seeking to develop land, support should be given to proposals which will cross-subsidise new facilities and enable the provision of vital, modern and fit-for-purpose healthcare that benefits the wider community.
- The recognition that improvements in health facilities will be supported, including where required to respond to changing needs and demands of residents, is welcomed.
- It is important that all new developments be designed to encourage walking, cycling and public transport, to reduce the negative effects of traffic, and improve health.

**Education Provision:**

- Ensure that education contributions made by developers are sufficient to deliver the additional school places required to meet the increase in demand generated by new developments.
- Highlight the requirements for developer contributions towards expanding existing schools, and the provision of new schools.
- Ensuring there is an adequate supply of sites for schools is essential and will ensure that the local authorities within the Greater Manchester area can swiftly and flexibly respond to the existing and future need for school places over the plan period.
- Pupil yield factors should be used to understand the number of children likely to arise from housing developments and the associated need for school places. These should be based upon evidence from recent developments; thereby matching school census data to housing developments in order to determine actual pupil numbers.
- Councils within the Greater Manchester area should set out their education infrastructure requirements for the plan period within an Infrastructure Funding Statement.
- When new schools are developed, local authorities should also seek to safeguard land for any future expansion where demand indicates this might be necessary.
- Whilst facilities, knowledge and universities are rightly areas of focus, there is little emphasis on the importance of the development of skills that are essential for the workplace and key to greater social mobility, i.e. high quality, well supported work-based learning needs.

**Community and Cultural Facilities:**

- New development (particularly at high density) should seek to retain or enhance existing community, cultural and social facilities.
- There are no references to theatre anywhere in the document despite it forming a core part of Manchester's extensive arts and cultural offer.
- Theatres and other cultural buildings can play a key role in helping to support town centres by driving footfall.
- The Framework would be enhanced by the addition of a policy setting out the plan's overall support for these types of facilities, and the importance of their retention.
- Recognise the contribution that community facilities (including pubs) make towards social inclusion and the role they play in place-making.
- The retail centre hierarchy is supported, but the Framework does not refer to the increasing role played by the night-time economy.
- The GMSF must recognise and plan for a wide range of social infrastructure, including Places of Worship, in order to discharge its Public Sector Equality Duty.
- Review the provision of land and buildings for social infrastructure purposes, in particular to meet the needs of the voluntary and not-for-profit sectors.
- There should be a policy to support and retain community and cultural facilities given Manchester's strong arts and cultural heritage

<b>Retail and Leisure Uses:</b>
<ul style="list-style-type: none"> <li>• The leisure policy should be strengthened to provide a clear steer that identifies designated city and town centre locations as the focus for retail and major leisure development.</li> <li>• Any applications for retail, commercial or leisure development should comply with the sequential approach where applicable.</li> <li>• Produce a retail and leisure background paper that objectively assesses the need for further leisure uses and explains the how these ‘needs’ have been derived (including the pattern, scale and quality of development required to meet them).</li> <li>• Unless there is a clear strategy for growth that focuses on the existing City Centre the GMSF could dilute and fragment the existing retail and leisure core of the Greater Manchester conurbation.</li> <li>• The value that leisure and culture can play in providing a high-quality sustainable living environment should be recognised.</li> <li>• Support the proposed hierarchy of centres but there should be greater protection provided to assure their continued vitality and viability given the challenges they face due to changing consumer behaviour.</li> <li>• The GMSF fails to recognise the importance of major leisure uses to delivering economic prosperity.</li> </ul>
<b>Sport and Recreation:</b>
<ul style="list-style-type: none"> <li>• The GMSF should explicitly confirm that the release of current sports pitches to meet the need for new homes will be considered acceptable where the provisions of national policy are met.</li> <li>• The GMSF should allow new development to enhance existing sport and recreation provision (in quality and quantity terms) both on and off site.</li> <li>• Families and children need local parks and open spaces if they are to lead healthy lives.</li> <li>• Creating new green space is equally as important as protecting existing green space.</li> </ul>
<b>Response to Comments:</b>
<ul style="list-style-type: none"> <li>• Have commissioned:             <ul style="list-style-type: none"> <li>○ Additional research and evidence (Topic Paper)</li> <li>○ A strategic historic environment assessment.</li> <li>○ Individual districts have commissioned site specific historic environment assessments.</li> </ul> </li> <li>• Engagement has taken place with the GM Health and Social Care Partnership.</li> <li>• Cross subsidy of new health facilities is a matter for individual LPAs.</li> <li>• The education policy highlights the need for Local Authorities to work with education providers to forecast likely changes in demand for school places</li> <li>• The community facilities policy refers to the need for new, accessible and improved facilities for all ages including further and higher education and adult training.</li> <li>• A new culture policy has been added to reflect the importance of culture in Greater Manchester.</li> <li>• A wider range of social infrastructure, including Places of Worship, voluntary and not-for profit sectors is out of scope (for the GMSF) and is a matter for individual Local Plans</li> <li>• The leisure policy has been strengthened to provide a clear steer that identifies designated city and town centre locations as the focus for retail and major leisure development – the sequential approach is already set out in NPPF.</li> <li>• Disagree that a specific retail and leisure background paper that objectively assesses the need for further leisure uses and explains the how these ‘needs’ have been derived</li> </ul>



(including the pattern, scale and quality of development required to meet them) is required. This isn't required by NPPF and is out of the GMSF scope.

- Disagree that the GMSF should explicitly confirm that the release of current sports pitches to meet the need for new homes will be considered acceptable where the provisions of national policy are met. Open space, sports and recreation facilities are already covered in NPPF and NPPG.
- Disagree that the GMSF should allow new development to enhance existing sport and recreation provision (in quality and quantity terms) both on and off site: (1) Open space, sports and recreation facilities are already covered in NPPF and NPPG and (2) this is Local Plan matter.
- Disagree that in order for the Spatial Framework to be considered sound, the accommodation requirements of gypsy and travellers will need to be linked into a policy that sets out a substantive and robust approach for meeting their needs and assessing applications. This is not within the scope of the plan.
- Agree that creating new greenspace is as important as protecting existing greenspace and the Greener GM chapter retain the greenspace and green infrastructure policies.

### **3.1.9. A Connected Greater Manchester**

There were 2,414 comments received on this chapter. There was general agreement with the objectives but various local issues raised, as well as some overall concerns with scope and affordability.

Concerns were raised that high levels of road congestion, and overcrowding on rail services, would be exacerbated as a result of development at the new allocations and that the scope and hours of operation of public transport is not sufficient to ensure modal shift. Without adequate, public transport networks in place residents will remain reliant on the private car. This is particularly an issue for those new allocations located in rural or semi-rural areas.

Comments were received that Greater Manchester needs fully reformed and publically run bus service akin to what is currently offered in London and there should be a focus on orbital routes for Metrolink so that passengers do not need to go into the city centre and change in order to reach their destination

There was support for greater use of rail and canals to carry freight, which will reduce congestion on the road network but also the view that growth in activity at the Airport is inconsistent with the aim of a zero carbon city.

The Streets for All approach was supported however it is also important that they are safe and secure. The needs of disabled people need to be considered to ensure that streets do not become a no- go area.

Some respondents considered that cycling and walking should be encouraged and routes should be attractive, well-lit and secure, whilst others felt there was too much emphasis placed on cycling and walking given the topography and weather in Greater Manchester.

Concerns were also raised that Greater Manchester lacks the funding necessary to delivery new transport schemes

In relation to digital connectivity there was general support for the policy with some responses highlighting the need to ensure that full digital connectivity is available within the rural areas around Manchester and provided to all education facilities. Concerns were raised that the proposed policy fails to address the issue of older and poorer citizens who are not currently digitally connected.

<b>Connectivity</b>
<ul style="list-style-type: none"> <li>• General agreement with the objectives but various local issues raised, as well as some overall concerns with scope and affordability</li> <li>• High levels of road congestion, and overcrowding on rail services, would be exacerbated as a result of development at the new allocations</li> <li>• The scope and hours of operation of public transport is not sufficient to ensure modal shift. Without adequate, public transport networks in place residents will remain reliant on the private car. This is particularly an issue for those new allocations located in rural or semi-rural areas.</li> <li>• There is an environmental impact of traffic congestion, which will be exacerbated through new developments.</li> <li>• Greater Manchester lacks the funding necessary to delivery new transport schemes</li> </ul>
<b>Digital Connectivity:</b>
<ul style="list-style-type: none"> <li>• Ensure that full digital connectivity is available within the rural areas around Manchester will support economic growth, whilst educing development needs .</li> <li>• Support investment in new and upgraded networks to increase the range and quality of coverage.</li> <li>• Full fibre broadband should be provided to all education facilities.</li> <li>• The siting of telecommunications infrastructure should be sensitively considered as it can introduce man-made structures into rural landscapes that are free from development.</li> <li>• Areas around the city centre are in desperate need of full fibre broadband.</li> <li>• 5G could be damaging to human and animal health.</li> <li>• Manchester has an opportunity to be at the forefront of digitalisation but this cannot be achieved easily and requires clear and detailed planning.</li> <li>• The infrastructure needed for this has to be carefully planned for so that green spaces are not developed.</li> <li>• The policy proposed fails to address the issue of older and poorer citizens who are not currently digitally connected.</li> <li>• The question of digital connectivity is addressed through the Building Regulations. Consequently, it is unnecessary for the GMSF to set more stringent requirements through policy.</li> <li>• Fibre broadband should be available within affordable home developments even though fewer people might be able to afford to take up the services available.</li> <li>• The policy should refer to ensuring digital connectivity for existing, as well as new residents.</li> <li>• The policy is not clear enough and does not reflect changes to national planning policy. The stipulation for ‘multiple-ducting’ alone will not necessarily result in a range of suppliers being available. We are now actively seeking to encourage Local Planning Authorities to include broadband policies in their Local Plans which mandate both full fibre connections and a choice of infrastructure suppliers on each site to reflect the changes to national planning policy. The GMSF Greater should highlight these changes and promote adherence to them.</li> <li>• It was argued that this policy should be deleted as digital connectivity is addressed through Building Regulations and it is unnecessary to set more stringent requirements. National policy does not allow the Mayor of Greater Manchester to make policy in this area according to the Written Ministerial Statement following the Housing Standards Review.</li> </ul>
<b>Public Transport</b>
<ul style="list-style-type: none"> <li>• Support principles of the policy on the Public Transport Network, in particular investing in the rail network. Such investment must not however be exclusively for passenger rail but should also take into account the needs of the rail freight sector.</li> <li>• Public transport services have been withdrawn outside of the main urban areas, and where services remain fare increases mean that they are not affordable for many people. This does</li> </ul>

<p>not provide a good alternative to the car and has a particular impact on people who are disabled or may be socially isolated.</p> <ul style="list-style-type: none"> <li>• Public transport is over-crowded, particularly in peak times, this will be made worse by additional housing.</li> <li>• Public transport is too expensive, and you can't use day/return tickets on different bus companies. There should be better integration between modes meaning you could buy a ticket for a door-to-door journey irrespective of the types of mode you use.</li> <li>• Public transport is infrequent and unreliable, which doesn't make it attractive, there is also too little car parking at key train and Metrolink stations.</li> <li>• Bus services need to operate as in London, with a regulated service pattern and fares set by the Council. The private bus companies do not offer good value for money.</li> </ul>
<p><b>Highways</b></p>
<ul style="list-style-type: none"> <li>• Transport proposals are insufficient to support development plans, and focus too much on cycling and walking. Highway improvements will be needed if these plans are to be realised.</li> <li>• Current road infrastructure needs to be better maintained, this includes sorting out pot holes and fixing dangerous pavements.</li> <li>• Environmental aspirations will be impossible to achieve if new roads are built and road space is expanded. More roads means more traffic.</li> <li>• Streets need to be made safer by reducing speeds, and designing in features that support vulnerable road users</li> <li>• Infrastructure improvements needs to be made in advance of new development, not after or during construction. Sustainable travel and the use of public transport should be embedded early on</li> <li>• New highways will lead to reductions in air quality, more noise, and a loss of biodiversity</li> <li>• It is argued that further work is required to identify specific improvements and this should be set out in an Infrastructure Delivery Plan and the refreshed South East Manchester Multi Modal Strategy (SEMMMS) should be referenced</li> </ul>
<p><b>Freight and Logistics</b></p>
<ul style="list-style-type: none"> <li>• Support for greater use of rail and canals to carry freight, which will reduce congestion on the road network.</li> <li>• Growth in activity at the Airport is inconsistent with the aim of a zero carbon city. Both of these objectives cannot be true.</li> <li>• The city region should support freight vehicles which use alternative fuels over diesel in order to reduce the amounts of NOx, and make a positive impact on people's health</li> <li>• The release of large areas of greenfield land for logistics would be car based and unsustainable. It would also require major and hugely costly transport infrastructure to be implemented to deliver the scale of development proposed that could be better spent on other projects.</li> <li>• Logistics are certainly important, but the area is already saturated by Logistic firms all adding to the congestion, and pollution. HGV restrictions need to be enforced in all residential areas.</li> <li>• Consolidation centres would allow HGVs to be kept out of town and city centres and for goods to be delivered to their final destination using electric vehicles.</li> <li>• Logistics centres generate small numbers of low skill, low pay jobs, but pull in large amounts of highly polluting HGV traffic. The sites in this plan are not located anywhere near a rail line or canal.</li> <li>• Existing business parks still aren't full. You should be encouraging businesses to use these before providing new ones for companies to use.</li> </ul>

### **Streets for All**

- Considering people and place is good. People and sustainable transport must be prioritised over vehicle movement. Increasing greenery is beautiful, good for mental health and also a carbon sink. Greenery also increases workplace productivity - there are multiple studies supporting this
- It is important to make streets accessible to all, but it is also important that they are safe and secure. The needs of disabled people need to be considered to ensure that streets do not become a no go area
- Streets should incorporate more green space as it makes them more attractive for people to spend times, as well as reducing and mitigating the impacts of air and noise pollution from cars.
- The release of land from the Green Belt is not consistent with the plans to make streets more attractive by greening them. The new sites will place a huge burden on existing transport infrastructure and will be dangerous for cyclists and pedestrians, as well as making air pollution worse.

### **Transport Requirements of Developments**

- Infrastructure should be ready before developing housing, Developers should be made to pay for infrastructure improvements before allowing them to build
- There is broad support for this policy
- New sites must be master planned to ensure that adequate transport infrastructure is put in place to ensure the viability of the site.
- Existing infrastructure is not up to scratch in order to support the current population without increasing population levels in areas with already inadequate infrastructure
- A number of respondents felt that developers should be held to account for contributions to support transport infrastructure
- However, other respondents felt that developers would use these commitments as an excuse to not deliver on other requirements, such as affordable housing.
- Any new development should not be built in areas with high pollution levels as this would be deemed unsafe to public health.

### **Cycling and Walking**

- Cycling and walking should be encouraged and routes should be attractive, well-lit and secure. This policy will promote physical as well as mental wellbeing.
- There is too much emphasis placed on cycling and walking, Greater Manchester is too hilly and the weather too bad to make it suitable if you need to arrive somewhere clean and dry or if carrying bags.
- Cycling infrastructure needs to be high quality and continuous. Potholes and congestion make cycling unsafe.
- The plans for cycling are not ambitious enough. Cycle lanes are required on all major roads and a holistic approach needs to be taken to ensure infrastructure is a consistent standard across all District.
- The plans for cycling are too ambitious. Only a small proportion of the population want to cycle but everyone is inconvenienced by the narrowing of roads and the inconvenience of cycle lanes.
- It is one thing to provide cycling and walking infrastructure but if it is not maintained it will not be used. Cycle lanes are full of pot holes and litter Infrastructure also needs to be advertised and promoted to ensure usage.
- The Bee Lines network needs to be given priority in all new developments, with cycling and walking infrastructure integrated into the design of the development

## Other issues

- Greater Manchester needs fully reformed and publically run bus service akin to what is currently offered in London.
- There should be a focus on orbital routes for Metrolink so that passengers do not need to go into the city centre and change in order to reach their destination

### Response to Comments:

- The overall framework for transport investment across Greater Manchester (GM) is contained in the *Greater Manchester Transport Strategy 2040* and the *2040 5-Year Delivery Plan*. The delivery plan draws on the two GMSF Transport Study Reports, *Understanding the Issues* and *Addressing the Issues*. The *2040 5-Year Delivery Plan* should be read alongside this GMSF chapter.
- Locality Assessment work has been done for each allocation to demonstrate that the site can be delivered with the transport impacts mitigated alongside the accumulative impact of all GMSF growth. Potential public transport and sustainable transport proposals are also being developed from the outset, where feasible, to mitigate the need to travel by car.
- Affordability: GM is involved in ongoing discussions with Government as part of the devolution agenda to secure a long-term funding settlement that will allow for a full programme of infrastructure investment. Government has identified £4.2bn for mayoral combined authorities over a five-year programme which will allow GM to start to plan and deliver programmes of investment whilst developing capability and capacity.
- Congestion: Road congestion is being addressed through the Mayor's Congestion Deal. Rail overcrowding is being tackled through rail franchise commitments, which will provide 40,000 more seats and upgraded rolling stock. More trams are being delivered. However, the challenge of road congestion and rail overcrowding driven by growth in the economy and population will need to be continually addressed.
- The *2040 5-Year Delivery Plan* includes rail capacity studies which are looking at where improvements are needed, and opportunities to work with Network Rail and train operators to provide more seats and more journeys.
- Most development will be on land within the existing urban area which already benefits from access to public transport. A focus on town centres for residential developments will help ensure access to public transport for those residents.
- For the allocations, the site selection process has focused on selecting locations which are closest to existing public transport networks (amongst other priorities) to help mitigate the impact of development on the highway network.
- GM has existing transport solutions for areas not well served by conventional public transport. These are innovative and demand responsive approaches, such as Local Link. Shared services such as bike hire schemes and car clubs will also play a role.
- GM has an ambitious target to be carbon-neutral by 2038. The GM 5-year Environment Plan sets out five decarbonisation priorities for transport, which align with GM's Transport Strategy 2040 and the emerging GM Clean Air Plan:
  - Increasing use of public transport and active travel modes;
  - Phasing out fossil-fuelled vehicles and replacing with zero-emission alternatives;
  - Tackling the most polluting vehicles on our roads;
  - Establishing a zero-emission bus fleet; and
  - Decarbonising road freight and shifting more freight movement to rail and water.
- GM is developing a Clean Air Plan which will include a package of interventions to reduce NO2 concentrations in the 'shortest possible time', as required by Government.
- Most GM bus services are run by private operators on a commercial basis with GMCA, TfGM and local councils currently having little influence. TfGM will fund parts of the bus network that operators consider insufficiently profitable, but which are essential to connect people with work and local services. The mayor is considering changes; options available include different types of partnerships and franchising. Newly devolved powers have the potential to bring improved

routes, frequencies, timetables, fares, ticketing, network integration and quality standards. TfGM funds and manages the Ring and Ride service, which provides door-to-door, demand responsive transport to residents who find it difficult to use conventional public transport. TfGM is currently exploring new flexible bus services serving rail and Metrolink stations. TfGM will continue to fund concessionary fares for children, elderly and disabled people. It is also funding concessionary fares for some women affected by changes in the state pension age and provides free public transport travel for 16-18-year olds in full time education to and from school or college.

- Our ambition is to enable people to move seamlessly between services on a single, easy-to-use network. TfGM will be working with Transport for the North (TfN) to deliver its Integrated and Smart Travel programme, which will make it easier to make multi-mode, multi-operator, price-capped journeys across the North.
- Many of the proposed interventions relate to improvements in the frequency and reliability of public transport, and Park & Ride site upgrades.
- The Transport Act 2000 (as amended) allows the GMCA to reform the bus market. Options include different types of partnerships and franchising, which is the system used in London. These powers have potential to bring benefits, including improved routes, frequencies, timetables, fares, ticketing, network integration and quality standards.
- Locality Assessment work has been undertaken for each of the allocations to demonstrate that each can be delivered with the necessary transport infrastructure, including public transport where feasible. In many cases the mitigation required will include highway junction improvements. Some allocations require new highway infrastructure to better integrate the site into the existing transport network. A small number of highway infrastructure schemes will also be required to support the delivery of new housing, and to alleviate pinch-points on the existing network. Where new highway infrastructure is necessary, environmental impacts may be mitigated as far as possible. It is neither economically viable nor environmentally desirable to undertake a large-scale program of new highway construction. Therefore, there is a focus on mode shift to increase use of public transport, walking and cycling.
- Road maintenance: local authorities have a statutory duty to maintain their highways. TfGM has a five-year investment program to maintain the Key Route Network.
- The Streets for All programme involves developing streets for the benefit of all users, including the vulnerable. It proposes to incorporate more green space in our street where possible. It will allow a holistic approach to the design and management of the highway network to tackle issues such as congestion and pollution, with a focus on balancing the movement of people and goods alongside the creation of more people-friendly and less polluted streets and places.
- Infrastructure for new developments: Where the transport infrastructure relates specifically to a particular development site, it is often not possible to provide it in advance. If it is to be privately funded the developer often can't cover the upfront costs without first receiving some returns from the development. Publicly funded infrastructure requires a positive business case which is often dependent on the development coming forward to produce demand for the infrastructure. Ideally in both these cases the infrastructure and the development would be provided concurrently. For more strategic (non site specific) infrastructure it may be easier to provide publicly funded infrastructure ahead of development where a positive business case already exists. This process will be further refined at the planning application stage through the submission of Transport Assessments which should stipulate when particular infrastructure is expected to be required.
- The location of freight and logistics sites is driven by market demand and sites located close to rail and water terminals are less common than those located close to the road network. However, where opportunities arise TfGM will work with developers to support the creation of rail and water linked logistics sites which demonstrate a viable business case. There is scope to work with other bodies, such as TfN, to adopt a pan-Northern approach to freight and to explore opportunities to move more freight by rail. The opportunity to introduce rail freight into Port Salford will be key to facilitate the delivery of Port Salford as a tri-modal logistics hub utilising road, rail and the Manchester Ship Canal. Other ways to reduce the freight and logistics impact

on congestion will also be promoted such as the use of consolidation centres and local distribution using sustainable means for final destinations.

- Manchester Airport is working towards being carbon neutral in relation to ground transport emissions. TfGM will work with the airport and its customers, partners and stakeholders to identify new ways to reduce the environmental impact of its operations.
- The Clean Air Plan contains a comprehensive package of measures to support a move to more sustainable fuels. This includes modal shift, increased efficiency and alternative fuels for heavy vehicles. Heavy goods vehicles are currently essential but have few zero emission alternatives. Low emission fuels and changes to logistics infrastructure could significantly reduce emissions.
- Influencing the movement of heavy and light goods vehicles on our roads will be a key focus of the 2040 5-Year Delivery Plan to benefit the economy and manage the negative impacts of freight on our local road networks and communities. We will work with the freight industry to introduce sustainable distribution where possible, including consolidation of freight movements in urban areas and for public sector organisations, and potentially using greener vehicles for 'last mile' delivery. TfGM are progressing a range of projects, including with Regional Centre businesses, to assess the viability of consolidation centres.
- The existing land supply, including land still available at existing business parks, was taken into account in developing the employment land requirement over the plan period.
- Masterplans for the site allocations will ensure that development and transport investment fully considers the needs of all people and those modes which make most efficient and sustainable use of Greater Manchester's limited road space, by following the Global Street Design Guide hierarchy as set out in GMSF policy GM C-1.
- Site viability assessment will aid the districts in determining the different requirements of private sector development contributions for each site.
- The Cycling and Walking Commissioner's infrastructure proposal in his 2017 Made to Move report has identified 1,000 miles of walking and cycling routes. Local authorities will develop and deliver schemes via the Mayor's Challenge Fund for Cycling and Walking. At present there is £160m in the fund available over the next four years to roll out a programme of high quality, well maintained, attractive and well publicised cycle and walking routes. The longer-term proposition for cycling and walking is being developed through a Local Cycling and Walking Infrastructure Plan for Greater Manchester, which builds on the recommendations of the Cycling and Walking Commissioner. To encourage more people to walk and cycle, we also need to improve the quality of the streetscape, and make sure that the urban environment is sufficiently attractive and safe to pass through on foot and by bike. This is why we are actively embedding good active travel design into the City Centre Transport Strategy, other town centre strategies and into our Streets for All approach.
- It is recognised that cycling and walking are not suitable for everyone and all journeys, but the plans set out in the Bee Network aim to ensure that everyone that wants to walk and cycle, are able to do so safely. Where high quality cycle infrastructure has been introduced, we have witnessed significant increases in the number of cyclists.
- Providing for sustainable modes on our highways will make them more reliable and safer and will help to make the best use of available highways capacity by enabling higher volumes of people to move more safely and efficiently through the network. It is important, however that the design of cycling infrastructure is suitable for the function of the road in terms of the amount of through traffic and public transport provision.
- The shared use of highway space has the potential to cause conflicts between different users, for example at crossing points. Schemes will be designed to reduce these conflicts as far as possible to protect the most vulnerable road users.
- The provision of world-class walking and cycling infrastructure, will enable walking and cycling to become the natural choice for short journeys and, in turn, will make Greater Manchester a healthier, cleaner and safer place to live as well as making a significant contribution to achieving our vision of 50% of trips to be undertaken by walking, cycling or public transport by 2040.
- GMSF policy GM N 7 will ensure that all new development will be required to prioritising safe and convenient access to the site and buildings for all users in accordance with the user hierarchy set



out in Policy GM N 1. This will include providing new and enhanced walking, cycling routes through and around the site and improve the coverage, quality and integration of the wider walking, cycling network.

- It is unlikely that a positive business case for many orbital Metrolink routes could be demonstrated due to limited demand and many “orbital” journeys will be quicker via the city centre particularly as there are now a number cross city services available by bus, Metrolink and rail. However, there is demand for public transport links between Greater Manchester town centres and travel across the wider city region that can be met by improved bus services.
- We are undertaking an ambitious study of potential Quality Bus Transit corridors on key corridors across GM linking town centres and other areas of high trip generation. Quality Bus Transit corridors are whole-route upgrades of key bus corridors, with a strong focus on quality and reliability. These will be focused mainly on short-distance trips of less than 6km and will incorporate comprehensive bus priority packages.
- We are also exploring options for new bus rapid transit links for longer distance journeys, following the success of the Leigh-Salford Manchester guided busway, including potential services from the Airport and also new links to the M62 North- East Corridor (Northern Gateway) development area.
- Further priorities for rapid transit including further Metrolink expansion and the potential for tram/train development are set out in the 2040 5-Year Delivery Plan.

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- In response to the comments received, the GMSF has been amended in the following areas:
    - the climate emergency declaration
    - the GM 5-year Environment Plan
    - the Clean Air Plan
    - the transport sector's contribution to carbon emissions and the five specific decarbonisation priorities.
    - Recommendations of each of the Locality Assessments are reflected in the relevant GMSF allocation policy.
    - GMSF “Our Network” chapter sets out our approach to Streets For All.
- Recommendations of each of the Locality Assessments are reflected in the relevant GMSF allocation policy.

### 3.2. Strategic Allocations

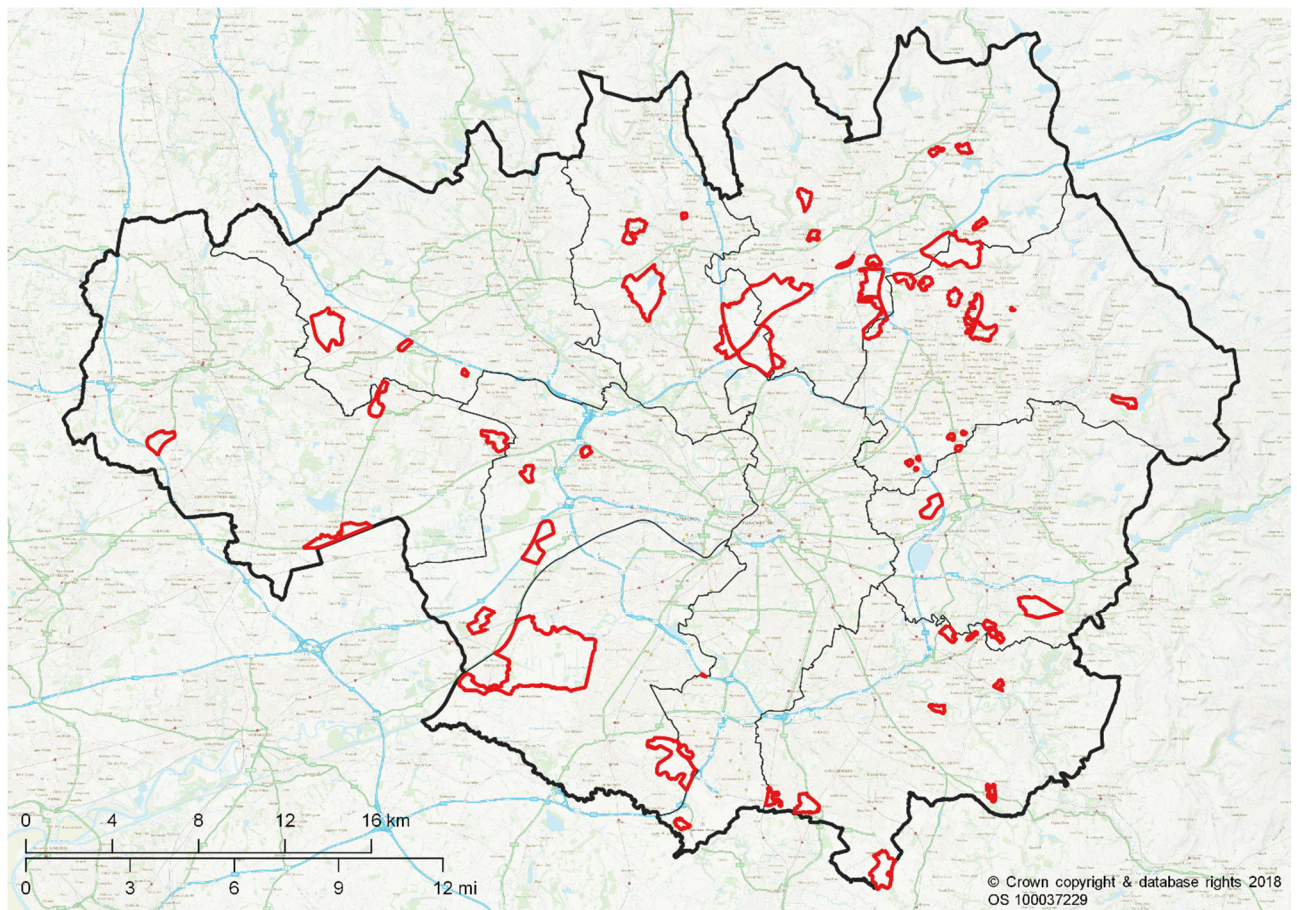
To deliver the inclusive and prosperous future outlined in the Greater Manchester Strategy, Greater Manchester authorities have sought to maximise the use of land outside of the Green Belt, giving the highest priority to brownfield land.

The GMSF sets out 55 proposed land allocations for employment and housing land.

The strategic employment and housing locations were selected based on their location and the opportunity they provide to address some of the economic disparities evident within the conurbation and provide a greater mix of housing. Some of these sites straddle local authority boundaries.

The majority of the respondents (95%) answered at least one question relating to allocations to the GMSF consultation related to these strategic allocations. Below sets out an overview of the responses received relating to each allocation.

The map below shows the location of the proposed allocations:



**Figure 2: GMSF 2019 Allocations**

### 3.2.1. Cross-Boundary Strategic Allocations

The following section provides an overview of the responses relating to the cross-boundary allocations. There were 4,538 comments to these questions.

The cross-boundary allocations cover the districts of Bury, Oldham and Rochdale.

#### GM Allocation 1: Northern Gateway (463 comments)

There was some support for employment given its location and motorway access, although many find this to be a disproportionate distribution of employment land and query the need when existing estates in the area are below capacity. The other main issues raised as objections are traffic and air quality concerns; specifically as existing roads and motorways are at capacity and proposed solutions do not alleviate the situation, excessive loss of Green Belt, unreasonable scale of housing growth which will overwhelm small villages of character and quality of life, lack of social infrastructure, loss of natural environment and loss of working farms. There is also concern at a lack of detail regarding infrastructure improvements and the jobs to be created. It was generally felt that there are other opportunities on brownfield land within urban areas that should be considered first

There was concern that GMA1 does not set out all the transport requirements that are listed in GMA1.1, 1.2 and 1.3 and these should be consistent. Landowners and developers in the area note the potential for individual allocations to come forward early but raise concern that infrastructure requirements and the need for a masterplan for the whole of GMA1 prior to commencement could hinder progress. There was concern raised about its impact on farmland bird populations and question its identification as it is part of the GM Ecological Network.

Principle / scale of development
<ul style="list-style-type: none"> <li>• Disproportionate distribution of employment land, is not consistent with Bury’s historic rates of development, allocated too much land as most will not come forward until after plan period. Must revisit based on sustainable and not accelerated growth/Brexit impact.</li> <li>• Excessive loss of Green Belt, major impact on Bury South and needs to be distributed evenly across GM, will undermine regeneration of town centres.</li> <li>• Unreasonable scale of housing growth overwhelming small villages/quality of life. Simister/Bowlee cannot merge under law.</li> <li>• Scale of development a concern which will increase traffic due to proximity of motorways and wider growth planned close to site. Policy needs to set out requirements for either roads/motorways.</li> <li>• Inconsistent with natural environment/climate change objectives.</li> <li>• Potential for individual allocations within GMA1 to be delivered early, but the need for a masterplan and infrastructure for GMA1 prior to commencement could hinder progress.</li> <li>• Support – Major landowner has been in extensive discussions with local authorities/landowners and is seeking a development partner. Site in excellent location and motorway access, opportunity for investment in north of GM to contribute to economic growth, should be supported with small clusters of housing. Agree that masterplan needed to enable infrastructure delivery. Split into three sites allows for areas of varying character and early delivery.</li> </ul>

<b>Housing (inc affordable housing)</b>
<ul style="list-style-type: none"> <li>• Proposed layout will destroy the character of villages. Some view that higher densities are required to minimise greenfield loss.</li> <li>• Increasing the population will displace problems elsewhere.</li> <li>• Unviable, market cannot absorb large quantity in one area, also the cumulative effect of other allocations in north to consider.</li> <li>• Concern that GMA1 targets are in addition to district targets.</li> <li>• Housing will not be affordable and need local definition, does not but must cater for over 65s. must be carbon-neutral.</li> <li>• No information on viability.</li> </ul>
<b>Employment and Economy</b>
<ul style="list-style-type: none"> <li>• Rebalancing GM economy – lack of local support/is reasonable as it is an opportunity to regenerate deprived adjoining areas.</li> <li>• Will not attract the right kind of development, only low skill jobs, better opportunities in Salford/Manchester.</li> <li>• No need given that existing industrial estates are below capacity.</li> <li>• Policy not specific enough, lack of detail on jobs to be created.</li> <li>• Evidence required on need for logistics hubs, justification against demand.</li> <li>• Impact on existing businesses, loss of agricultural land and jobs.</li> </ul>
<b>Green Belt</b>
<ul style="list-style-type: none"> <li>• Disproportionate loss of Green Belt in area and compared to others, would not be needed if 2016 housing projections used. Encourages urban sprawl and merging of towns.</li> <li>• Concern that there will be further removal of Green Belt.</li> <li>• New communities on the moors would have more identity than being part of urban sprawl.</li> <li>• No case for exceptional circumstances.</li> </ul>
<b>Brownfield</b>
<ul style="list-style-type: none"> <li>• There are other opportunities on brownfield land within urban areas and should be considered first, distributed evenly in Bury's six towns. Need single occupancy dwellings in town centres.</li> <li>• Should expand existing employment sites, consider relocating businesses to under-occupied sites to free up for housing.</li> <li>• Need to discourage land banking and offer grants to firms.</li> </ul>
<b>Transport – Highways / Public Transport / Cycling / Walking</b>
<ul style="list-style-type: none"> <li>• Existing roads/motorways/junctions at capacity. Infrastructure must address increased need. Scale of development will lead to increase in travel demand between GM and Rossendale along the M66. M62 corridor growth impacts on freight traffic flows.</li> <li>• Proposed road solutions do not alleviate the situation. Previous issues raised ignored. Junctions will be too close together. Access roads exit onto already congested roads. Poor emergency access.</li> <li>• Policy does not include requirements of GMA1.1, 1.2 and 1.3.</li> <li>• Current public transport inadequate/non-existent. Train services infrequent. Proposed measures useless as will still use cars. East Lancashire Railway should be used for commuting/freight.</li> <li>• Lack of detail regarding infrastructure improvements.</li> <li>• Access needed for all users. Will result in loss of footpaths.</li> </ul>

<ul style="list-style-type: none"> <li>• Support – Detailed proposals on infrastructure welcomed. Birch junction support by some, though it may lead to more congestion.</li> </ul>
<p><b>Physical Infrastructure and utilities</b></p>
<ul style="list-style-type: none"> <li>• Existing infrastructure at capacity. Proposed infrastructure improvements are inadequate.</li> <li>• Two overhead lines on-site, buildings should not be built below.</li> <li>• Need for additional waste management capacity will arise.</li> <li>• Support – Detailed proposals on infrastructure welcomed.</li> </ul>
<p><b>Social Infrastructure</b></p>
<ul style="list-style-type: none"> <li>• Existing schools are at capacity. Many demolished recently. Extension of St John’s School would be a loss of identity.</li> <li>• Impact on health services. Need for health facilities to be provided.</li> <li>• Community uses should be co-located. Food shops need to be accessible for those without a car and to promote cohesion.</li> <li>• Must be provided prior to development.</li> <li>• No detail on enhanced recreation/community facilities. No detail on schools proposals and how their requirements were calculated, and should be subject to consultation. Some locations unsuitable.</li> <li>• Need to be clear on recreation land to be retained.</li> <li>• Support – Detailed proposals on infrastructure welcomed.</li> </ul>
<p><b>Environmental – Green Infrastructure, Biodiversity, open space</b></p>
<ul style="list-style-type: none"> <li>• Loss of green space used for recreation, walking and cycling.</li> <li>• Loss of wildlife habitats and biodiverse site of GM importance – in GM Ecological Network, impact on farmland bird populations and need to consider NERC Act 2006.</li> <li>• No data/map layers on habitats and species.</li> <li>• GMG10 protects peat-based soils and needs to be applied here.</li> <li>• Support – Opportunities to secure net gains for nature which can be applied to green infrastructure, deciduous woodland and soils. Green Infrastructure network welcomed.</li> </ul>
<p><b>Air Quality</b></p>
<ul style="list-style-type: none"> <li>• Increased pollution from traffic, impact on health and wellbeing.</li> <li>• No detail/evidence on mitigation, tree planting not effective.</li> </ul>
<p><b>Flood risk</b></p>
<ul style="list-style-type: none"> <li>• Development will make existing flooding issues far worse.</li> <li>• No detail on improvement works.</li> </ul>
<p><b>Heritage</b></p>
<ul style="list-style-type: none"> <li>• Impact on places of historic significance.</li> </ul>

## Other

- Lack of consultation from Bury and Rochdale Council
- No quality jobs being offered in Bury, all in centre of the conurbation
- Negative impact on mental and physical health
- Housing – Figures are out-of-date as using 2016 projections, need to build at higher densities, need to control immigration, Brexit will reduce need for housing.
- Loss of amenity – Residents will lose their unspoilt views. Properties will lose their value, request for compensation. Impact on residents of Brookvale Home in Simister.
- Consultation has been inadequate from local authorities/GMCA.
- Concerns over noise pollution and that it may not be adequately mitigated. Tree planting not enough.
- Climate change – Electricity generation inadequate to meet increased demand for electric vehicles. Increase in food miles.

## Response to Comments

It should be noted that this Policy will no longer be a specific Policy in the GMSF, Policies GM1.1 Heywood/Pilsworth and GM1.2 Simister/Bowlee will cover the requirements for each site within the Northern Gateway. It should be noted that the previously proposed allocation for Whitefield has been removed.

### Principle / scale of development

The Northern Gateway is an extensive area located around Junction 18 of the M60 motorway extending east to junction 19 of the M62 and north of junction 3 of the M66. It comprises two key sites within the wider North-East Growth Corridor:

- Heywood/Pilsworth (Bury and Rochdale) (see Policy GM Allocation 1.1 Heywood/Pilsworth (Northern Gateway)); and
- Simister and Bowlee (Bury and Rochdale) (see Policy GM Allocation 1.2 'Simister/Bowlee (Northern Gateway)')

The Northern Gateway straddles the districts of Bury and Rochdale and is positioned at a strategically important intersection around the M60, M62 and M66 motorways. This strategic allocation will enable the delivery of a large, nationally-significant employment opportunity to attract high quality business and investment, with a complementary housing offer on the M62 corridor, where there is strong evidence of market demand.

The allocation is of a scale that it represents a highly accessible opportunity for growth in Greater Manchester with wider benefits on a regional and national level. The central theme of the spatial strategy for Greater Manchester is to deliver inclusive growth across the city region complemented by a key aim to boost the competitiveness of the northern parts of Greater Manchester. The Northern Gateway is one of the key locations that will help to deliver these fundamental objectives. Transport analysis contained in the Locality Assessment has identified necessary mitigation to accommodate any additional traffic generated by the proposed allocation.

### Housing (inc affordable housing)

Policy GM-H4 covers density of new housing and seeks to maximise average density of new housing in accessible locations. The provision of a range of housing tenures and types is addressed by GMSF thematic policies specifically GM-H2 Affordability of New Housing and GM-H3 Type, Size and Design of New Housing. The allocation policies require the provision of affordable housing in accordance with local planning policy requirements.

### Employment and Economy

The allocation Policies (GM1.1 and GM1.2) include requirements to ensure that the design and layout allows for effective integration with surrounding communities, including active travel links and connections to local services, employment opportunities between Heywood/Pilsworth and Simister and Bowlee. The policy justification for GM1.1 considers that whilst the location of this allocation along the M62 corridor will be particularly attractive to the logistics sector, it is important that it provides high quality business premises for a range of other sectors including advanced manufacturing and higher value knowledge based businesses. The variety will not only provide a better range of good quality jobs but has the potential to provide premises for new and growing sectors, this diversifying both the local and sub regional economy. The allocation policy should be read in conjunction with Policy GM-P 1 – Supporting Long Term Economic Growth.

### Green Belt

The policies contained within the GMSF should be read as a whole, in relation to Green Belt Policy GM-10 covers the Greater Manchester Green Belt, the policy should be read in conjunction with the Green Belt Assessment and the Green Belt Exceptional Circumstances Justification Paper which sets out the case for exceptional circumstances for the Green Belt proposals as a whole and the specific case for this allocation.

### Brownfield

Issues relating to previously developed land are addressed by thematic Policy GM-S1.

### Transport – Highways / Public Transport / Cycling / Walking

Transport analysis contained in the Locality Assessment has identified necessary mitigation to accommodate any additional traffic generated by the Northern Gateway proposed allocation.

The allocation Policy for GM1.1 (Heywood/Pilsworth) sets out specific requirements for new and improved highways infrastructure to enable the proposed level of development to be accommodated, including: improvements to Junction 3 of the M66, Improved links between junction 3 of the M66 and Junction 19 of the M62. Other off-site highway works where these are necessary to ensure acceptable traffic movement, including a contribution towards the mitigation proposed at Croft Lane, Hollins Lane/Hollins Brow. The policy also includes a requirement to support the delivery of improved public transport infrastructure through the allocation (including Bus Rapid Transit corridors) and close to the allocation (including potential tram-train on the East Lancashire rail line between Bury and Rochdale) to enhance sustainable connectivity to the wider sub-region and adjoining districts and neighbourhoods. The policy also includes a requirement to deliver safe and convenient cycling and walking routes through the allocation designed to national and GM standards of design and construction.

The allocation Policy for GM1.2 (Simister and Bowlee) sets out specific requirements for supporting transport services and infrastructure including: an upgrade to the local highway network, traffic restrictions on Simister Lane to prevent this route from being a form of access/egress to and from the allocation, improved public transport provision through the allocation (including Bus Rapid Transit corridors) and close to the allocation (including potential Bus Rapid Transit or Metrolink extension to Middleton) in order to serve the development; and other off-site highway works where these are necessary to ensure acceptable traffic movement. The allocation policy also includes requirements to deliver a network of safe and convenient cycling and walking routes through the allocation designed in accordance with national and GM standards of design and construction.

### Physical Infrastructure and utilities

The allocation Policies for GM1.1 and GM1.2 set out a specific requirement for a comprehensive masterplan relating to the area to come forward in the plan period that has previously been approved by the LPA(s). The masterplan will include a clear phasing strategy as part of an



integrated approach to the delivery of infrastructure to support the scale of the development as a whole. The policies include a requirement to make provision for other necessary infrastructure such as utilities, broadband and electric vehicle charging points. The policies should also be read in conjunction with the Utility Statement for the Northern Gateway. Capacity and efficient use of utilities and infrastructure is addressed by GMSF thematic policy GM-D1 Infrastructure Implementation.

#### Social Infrastructure

The allocation policies (GM1.1 and GM1.2) set out a specific requirement for a comprehensive masterplan relating to the area to come forward in the plan period that has previously been approved by the LPA(s). The masterplan will include a clear phasing strategy as part of an integrated approach to the delivery of infrastructure (including recreation and social infrastructure) to support the scale of the development as a whole. Policy GM1.1 makes provision for a new primary school in the eastern part of the allocation to meet the needs of the prospective school aged residents. The policy also includes requirements for a range of supporting and ancillary services and facilities, such as the provision of a new local centre, and a requirement for financial contributions for offsite additional primary and secondary school provision.

Policy GM1.2 makes provision for a new two-form entry primary school to meet the needs of the prospective school aged residents. There is also a requirement for financial contributions for off-site additional primary and secondary school provision. The policy also includes requirements for a range of supporting and ancillary services and facilities, such as the provision of a new local centre which includes a range of appropriate retail, health and community facilities and ensure that it is integrated with existing communities.

#### Environmental – Green Infrastructure, Biodiversity, open space

The allocation Policies (GM1.1 and GM1.2) set out a requirement to minimise impacts on and provide net gains for biodiversity assets within the allocation in accordance with Policy GM-G10 – A Net Enhancement of Biodiversity and Geodiversity. The policies set out a requirement for the provision of new, high quality, publically accessible multifunctional green and blue infrastructure to provide health benefits to workers and residents as well as creating a visually attractive environment. Policy GM1.1 requires a management plan to demonstrate how the retention and improvement of Green and Blue infrastructure and nature conservation assets will continue to be managed. This should include the integration and enhancement of existing features such as Hollins Brook/Brightly Brook SBI and Whittle Brook. The allocation policy should be read in conjunction with policy GM-G2 Green Infrastructure Network and policy GM-G9 Standards for a Greener Greater Manchester. Policy GM1.2 includes a requirement to make appropriate provision for the long term management and maintenance of areas of green infrastructure, biodiversity features and other areas of open space. The allocation policies should be read in conjunction with policy GM-G2 Green Infrastructure Network and Policy GM-G9 Standards for a Greener Greater Manchester and supporting Ecology reports.

#### Air Quality

The policies contained within the GMSF should be read as a whole, in relation to Air Quality this is covered by policy GM-S6 – Clean Air, the GMSF policy should be read in conjunction with the Northern Gateway Noise and Air Quality Constraints Review.

#### Flood risk

Policy GM-S5 covers flood risk and the water environment and makes specific reference to sustainable drainage systems (SuDS) this should also be read in conjunction with the accompanying Strategic Flood Risk Assessment (SRFA) and the Northern Gateway Flood Risk Assessment and Drainage Strategies for GM1.1 and GM1.2. Policy GM1.1 makes specific reference to mitigating potential flood risk from all sources including Whittle Brook, Castle Brook and Brightley Brook and does not increase the flood risk elsewhere. Policy GM1.2 makes



specific reference to mitigating potential flood risk from all sources. The allocation Policies (GM1.1 and GM1.2) include a requirement to incorporate on-site measures to deal with surface water run-off in line with the hierarchy of drainage options ensuring, wherever possible, they are designed as multi-functional green infrastructure connecting to the wider green infrastructure network in accordance with thematic Policy GM-S5 Flood Risk and the Water Environment.

#### Heritage

Policy GM1.1 sets out a requirement to protect and, where appropriate, enhance the heritage assets and their setting within the allocation including the Grade II Listed buildings – Brick Farmhouse and Lower Whittle Farmhouse and the wider historic character of the surrounding setting in accordance with the findings and recommendations of a Heritage Impact Assessment. There is also a policy requirement to carry out a detailed assessment and evaluation of known and potential archaeological sites including Meadow Croft Farm, historic landscape features and built heritage assets, to establish specific requirements for the protection and enhancement of significant heritage assets.

Policy GM1.2 sets out a requirement to protect and enhance the heritage and archaeological assets within the vicinity of the allocation and their setting in accordance with the findings of a Heritage Impact Assessment.

The allocation policies should be read alongside the Northern Gateway Heritage Statements for both GM1.1 and GM1.2. Heritage is addressed by GMSF thematic policy GM-E2 along with the accompanying GMSF Heritage Environment Background paper.

**GM Allocation 1.1: Heywood/Pilsworth (Northern Gateway) (345 comments)**

Many have criticised a disproportionate distribution of employment land and query the need when existing estates in the area are below capacity, there is an overreliance on logistics and warehouses which will only create low skill low-wage jobs. The other main issues raised as objections are transport concerns; specifically as existing roads and motorways are at capacity and public transport is poor with no suitable solutions offered, loss of Green Belt and merging of towns, loss of recreation and biodiversity, increase in noise and air pollution, lack of social and utilities infrastructure, impact on flood risk and impact on heritage.

There is concern about the scale of the allocation as it has potential to give rise to traffic impacts due to its proximity to motorways.

Alternative strategies include the expansion of existing industrial estates, the recognition of the potential of Metrolink and East Lancashire Railway to serve the site, and the use of brownfield land within existing urban areas and landfill sites.

<b>Principle / scale of development</b>
<ul style="list-style-type: none"> <li>• Disproportionate distribution of employment land.</li> <li>• Large scale of site is a concern as it has potential to give rise to traffic impacts due to it being close to motorways.</li> <li>• No need when existing estates in area are below capacity.</li> <li>• Economic growth should not be at the expense of the community and the environment. Considerable impact on local agriculture.</li> <li>• Pilsworth landfill – include within developable area/unsuitable for development but could be a country park/should remain rural.</li> <li>• Support – Highly accessible and sustainable location for growth.</li> </ul>
<b>Housing (inc affordable housing)</b>
<ul style="list-style-type: none"> <li>• Should be set back from motorways and at high densities.</li> <li>• Will be expensive executive homes. Affordable home prices will not be affordable. Must provide for elderly. Need terraced homes.</li> <li>• Support – land is available for development. More housing needed closer to the planned jobs.</li> </ul>
<b>Employment and Economy</b>
<ul style="list-style-type: none"> <li>• Over-reliance on logistics and warehouses which have low-skilled and low wage jobs, needs to attract high technology industries. Will not solve the issue of a lack of suitable premises.</li> <li>• More detail required on jobs created, investors.</li> <li>• Should expand existing under-capacity industrial estates.</li> <li>• New jobs should be for local residents.</li> <li>• Consider impact of automation and Brexit.</li> <li>• Need to promote business growth in town centres.</li> <li>• Support – Provides significant employment opportunities and new impetus for regeneration.</li> </ul>
<b>Green Belt</b>
<ul style="list-style-type: none"> <li>• Release of Green Belt disproportionate in this area of the Borough and compared to other districts.</li> <li>• Will result in the merging of towns and urban sprawl.</li> <li>• Retained Green Belt includes land that is not appropriate such as Pilsworth Quarry.</li> </ul>
<b>Brownfield</b>
<ul style="list-style-type: none"> <li>• Must use brownfield land within the urban areas before considering greenfield land.</li> </ul>

<b>Transport – Highways / Public Transport / Cycling / Walking</b>
<ul style="list-style-type: none"> <li>Existing roads, motorways and junctions are at capacity.</li> <li>Highways - Too much emphasis on road transport/improvements necessary. Needs to be provided before development, evidence base/business case needs to set out detail on improvements to existing motorway junctions. Compulsory purchase concerns.</li> <li>Birch junction will not work/make roads dangerous, more detail required in policy/evidence. South Heywood link road scheme should be paused until wider proposals brought forward.</li> <li>Public transport is poor, particularly in Heywood, proposed solutions not suitable. Must recognise potential of Metrolink and East Lancashire Railway, subject to heritage impact, to serve site.</li> <li>Current cycling network dangerous. Cycle lanes not needed.</li> <li>There is some support for the detailed infrastructure proposals.</li> </ul>
<b>Physical Infrastructure and utilities</b>
<ul style="list-style-type: none"> <li>No capacity in existing utilities infrastructure. Sewer systems cannot cope in Bury in particular.</li> <li>Ground conditions on Manchester Road in Rochdale poor, road has often collapsed.</li> </ul>
<b>Social Infrastructure</b>
<ul style="list-style-type: none"> <li>Existing schools, particularly in Heywood, are poor and are at capacity.</li> <li>More information on impact on/capacity of health facilities, evidence on where money will come from.</li> <li>Need commitment that infrastructure will be provided before development starts and who will pay.</li> <li>Community uses should be co-located. Food shops need to be accessible for those without a car. Need for more retail/community facilities in Heywood area where industry dominates.</li> </ul>
<b>Environmental – Green Infrastructure, Biodiversity, open space</b>
<ul style="list-style-type: none"> <li>Loss of recreation space of high value to residents and visitors. Must continue to protect Pike Fold Golf Course and protect/ enhance routes for horse riders. Concern at impact on Thornham Cricket Club.</li> <li>Significant loss in biodiversity and fragmentation of wildlife sites, many priority habitats and designated areas of importance.</li> <li>Policy needs to strengthen protections and reference all relevant sites, giving appropriate buffers. Additional designations required.</li> <li>Green Infrastructure policy on offsetting land is non-committal.</li> <li>Protect trees and plant more trees. Enhance wildlife corridors.</li> <li>Evidence required – Ecology impact assessment.</li> <li>Support – significant area will be retained as publically accessible green infrastructure for workers and residents.</li> </ul>
<b>Air Quality</b>
<ul style="list-style-type: none"> <li>Carbon emissions will increase. No clarity on mitigation.</li> </ul>
<b>Flood risk</b>
<ul style="list-style-type: none"> <li>Concern over impact on Whittle and Whiteley Brooks.</li> <li>Underground watercourses not accounted for.</li> <li>Further analysis required on the likely flood risk at Castle Brook.</li> </ul>
<b>Heritage</b>
<ul style="list-style-type: none"> <li>Archaeological features on the site such as Meadowcroft Fold.</li> <li>Concern over impact on the listed building at Brick House.</li> </ul>

<b>Other</b>
<ul style="list-style-type: none"> <li>• Strategy – The northern areas are losing more Green Belt than the south and this is unfair. Bolton not released Green Belt. Has been a developer-led process. Bury should produce its own short-term plan which would not need Green Belt release.</li> </ul>
<ul style="list-style-type: none"> <li>• Site selection – Why have previous sites been rejected, areas in North Bury that are more affluent not considered.</li> </ul>
<ul style="list-style-type: none"> <li>• Transport – HS2 should be cancelled. Bus franchising and regulation needed. Parking required above or below developments to help release surface car parks for housing. Consider building more ring roads and use of intelligent traffic light systems.</li> </ul>
<ul style="list-style-type: none"> <li>• Housing – Plan needs to include a break point at which housing need/allocations are reviewed. Should address empty properties, homelessness. Negotiate housing need with adjoining authorities.</li> </ul>
<ul style="list-style-type: none"> <li>• Brownfield – large number of sites and vacant floors above shops in town centres and under-used employment sites that should be developed first. Also the Bowlee area used for car boot sales.</li> </ul>
<ul style="list-style-type: none"> <li>• Quality of life - Impact on physical/mental health, noise and light pollution likely. Not clear on mitigation. Impact on views.</li> </ul>
<p><b>Response to Comments</b></p> <p><u>Principle / scale of development</u>  The Heywood/Pilsworth allocation provides an opportunity for a large, nationally significant employment opportunity to attract high quality business and investment, with a complementary housing offer on the M62 corridor.</p> <p>The allocation seeks to deliver a total of around 1,200,000 sqm of industrial and warehousing space (with around 700,000 sqm being delivered within the plan period). This should comprise a mix of high quality employment premises in an attractive business park setting in order to appeal to a wide range of business sectors, including the development of an Advanced Manufacturing Park. Around 1,200 homes will be delivered within the allocation, 1000 homes along with a new primary school will be located within the eastern part of the site (within Rochdale). A further 200 homes will be located in the west of the allocation off Castle Road, north of Castlebrook High School playing fields.</p> <p>The allocation forms part of the Northern Gateway and is of a scale in order to address the central theme of the spatial strategy for Greater Manchester in delivering inclusive growth across the city region complemented by a key aim to boost the competitiveness and economic outputs from the northern parts of the conurbation. The Northern Gateway is one of the key locations that will help to deliver these fundamental objectives. Transport analysis contained in the Locality Assessment has identified necessary mitigation to accommodate any additional traffic generated by the proposed allocation.</p> <p><u>Housing (inc affordable housing)</u>  Policy GM-H4 covers density of new housing and seeks to maximise average density of new housing in accessible locations. The provision of a range of housing tenures and types is addressed by GMSF thematic policies specifically GM-H2 Affordability of New Housing and GM-H3 Type, Size and Design of New Housing. The allocation policy requires the delivery of a broad mix of houses which includes an appropriate mix of house types and sizes and accommodation for older people. The allocation policy requires the provision of affordable housing in accordance with local planning policy requirements.</p> <p><u>Employment and Economy</u>  The allocation policy includes a requirement to ensure that the design and layout allows for effective integration with surrounding communities, including active travel links and connections</p>

to local services, employment opportunities and over the M62 to proposed development at Simister/Bowlee (GM1.2). The policy justification considers that whilst the location of this allocation along the M62 corridor will be particularly attractive to the logistics sector, it is important that it provides high quality business premises for a range of other sectors including advanced manufacturing and higher value knowledge based businesses. The variety will not only provide a better range of good quality jobs but has the potential to provide premises for new and growing sectors, this diversifying both the local and sub regional economy. The allocation Policy should be read in conjunction with Policy GM-P 1 – Supporting Long Term Economic Growth.

#### Green Belt

The policies contained within the GMSF should be read as a whole, in relation to Green Belt Policy GM-10 covers the Greater Manchester Green Belt, the policy should be read in conjunction with the Green Belt Assessment and the Green Belt Exceptional Circumstances Justification Paper which sets out the case for exceptional circumstances for the Green Belt proposals as a whole and the specific case for this allocation.

#### Brownfield

Issues relating to previously developed land are addressed by thematic Policy GM-S1.

#### Transport – Highways / Public Transport / Cycling / Walking

Transport analysis contained in the Locality Assessment has identified necessary mitigation to accommodate any additional traffic generated by the proposed allocation.

The allocation policy sets out specific requirements for new and improved highways infrastructure to enable the proposed level of development to be accommodated, including: improvements to Junction 3 of the M66, Improved links between junction 3 of the M66 and Junction 19 of the M62. Other off-site highway works where these are necessary to ensure acceptable traffic movement, including a contribution towards the mitigation proposed at Croft Lane, Hollins Lane/Hollins Brow. The policy also includes a requirement to support the delivery of improved public transport infrastructure through the allocation (including Bus Rapid Transit corridors) and close to the allocation (including potential tram-train on the East Lancashire rail line between Bury and Rochdale) to enhance sustainable connectivity to the wider sub-region and adjoining districts and neighbourhoods. The policy also includes a requirement to deliver safe and convenient cycling and walking routes through the allocation designed to national and GM standards of design and construction.

#### Physical Infrastructure and utilities

The allocation policy sets out a specific requirement for a comprehensive masterplan relating to the area to come forward in the plan period that has previously been approved by the LPA(s). The masterplan will include a clear phasing strategy as part of an integrated approach to the delivery of infrastructure to support the scale of the development as a whole. The policy includes a requirement to make provision for other necessary infrastructure such as utilities, broadband and electric vehicle charging points. The policy should also be read in conjunction with the Utility Statement for Northern Gateway. Capacity and efficient use of utilities and infrastructure is addressed by GMSF thematic policy GM-D1 Infrastructure Implementation.

#### Social Infrastructure

The allocation policy sets out a specific requirement for a comprehensive masterplan relating to the area to come forward in the plan period that has previously been approved by the LPA(s). The masterplan will include a clear phasing strategy as part of an integrated approach to the delivery of infrastructure (including recreation and social infrastructure) to support the scale of the development as a whole. The allocation policy makes provision for a new primary school in the eastern part of the allocation to meet the needs of the prospective school aged residents. The policy also includes requirements for a range of supporting and ancillary services and

facilities, such as the provision of a new local centre, and a requirement for financial contributions for offsite additional primary and secondary school provision.

#### Environmental – Green Infrastructure, Biodiversity, open space

The policy sets out a requirement to minimise impacts on and provide net gains for biodiversity assets within the allocation in accordance with Policy GM-G10 – A Net Enhancement of Biodiversity and Geodiversity. The policy sets out a requirement for the provision of new, high quality, publicly accessible multifunctional green and blue infrastructure to provide health benefits to workers and residents as well as creating a visually attractive environment. A management plan will also be required to demonstrate how the retention and improvement of Green and Blue infrastructure and nature conservation assets will continue to be managed. This should include the integration and enhancement of existing features such as Hollins Brook/Brightly Brook SBI and Whittle Brook. The allocation policy should be read in conjunction with Policy GM-G2 Green Infrastructure Network and policy GM-G9 Standards for a Greener Greater Manchester and supporting Ecology reports.

#### Air Quality

The policies contained within the GMSF should be read as a whole, in relation to Air Quality this is covered by Policy GM-S6 – Clean Air, the GMSF Policy should be read in conjunction with the Northern Gateway Noise and Air Quality Constraints Review.

#### Flood risk

Policy GM-S5 covers flood risk and the water environment and makes specific reference to sustainable drainage systems (SuDS) this should also be read in conjunction with the accompanying Strategic Flood Risk Assessment (SRFA) and the Northern Gateway Flood Risk Assessment and Drainage Strategy. The allocation policy makes specific reference to mitigating potential flood risk from all sources including Whittle Brook, Castle Brook and Brightley Brook and does not increase the flood risk elsewhere. The allocation policy includes a requirement to incorporate on-site measures to deal with surface water run-off in line with the hierarchy of drainage options ensuring, wherever possible, they are designed as multi-functional green infrastructure connecting to the wider green infrastructure network in accordance with policy GM-S5.

#### Heritage

The policy sets out a requirement to protect and, where appropriate, enhance the heritage assets and their setting within the allocation including the Grade II Listed buildings – Brick Farmhouse and Lower Whittle Farmhouse and the wider historic character of the surrounding setting in accordance with the findings and recommendations of a Heritage Impact Assessment. There is also a policy requirement to carry out a detailed assessment and evaluation of known and potential archaeological sites including Meadow Croft Farm, historic landscape features and built heritage assets, to establish specific requirements for the protection and enhancement of significant heritage assets. The allocation policy should be read alongside the Northern Gateway Heritage Statement. Heritage is addressed by GMSF thematic policy GM-E2 along with the accompanying GMSF Heritage Environment Background paper.

**GM Allocation 1.2: Simister and Bowlee (Northern Gateway) (399 comments)**

The broad consensus is that the proposed housing is an unreasonable amount of development in one location which will harm village character, cause a loss of amenity and depress property values. The other main issues raised as objections are traffic and air quality concerns; specifically as congestion on existing roads and M62 which is most polluted area in the country and proposed solutions do not alleviate the situation, loss of Green Belt which will be universal in Simister, concern over flood risk, loss of greenspace and key ecological assets, impact on heritage and loss of working farms where owners have not been notified. There is also concern at a lack of detail regarding infrastructure improvements.

There is concern at the loss of fields and routes used by horse riders and the suggestion of the protection of key bridleways.

It was also felt that growth should be distributed more evenly across Bury, traffic should be diverted away from Simister Village as it cannot support high levels of traffic and greater use should be made of empty and underused brownfield sites.

<b>Principle / scale of development</b>
<ul style="list-style-type: none"> <li>• Unreasonable and disproportionate scale of development in one location.</li> <li>• Will cause considerable harm to character of small village, result in a loss of amenity and depress property values. Compulsory purchase will be required.</li> <li>• Some landowners wish to see the site extended.</li> <li>• Support, provided that villages sympathetically merged and appropriate separation distances implemented.</li> </ul>
<b>Housing (inc affordable housing)</b>
<ul style="list-style-type: none"> <li>• Layout not sympathetic to village which will be overwhelmed.</li> <li>• Scale of growth proposed not achievable and will take a number of years to come forward. Phasing will be critical to avoid flooding the market.</li> <li>• Does not cater for affordable/specialist housing needs. Needs to be environmentally friendly and delivered at appropriate densities.</li> <li>• Housing growth should be distributed more evenly across Bury.</li> <li>• There is support that the development will provide much needed housing in this location, there is a willingness from landowners in Simister to bring the site forward and more housing to south of village should be considered.</li> </ul>
<b>Employment and Economy</b>
<ul style="list-style-type: none"> <li>• No need for employment proposal at Heywood/Pilsworth as low unemployment and deprivation in Simister and Bowlee. Likely to be low paid, need quality manufacturing, no indication of interest.</li> <li>• Residents will have poor access and will need to commute out.</li> <li>• Support – Must invest in the Northern Powerhouse.</li> </ul>
<b>Green Belt</b>
<ul style="list-style-type: none"> <li>• Simister will lose all of its Green Belt, this was misrepresented in the consultation letter. Wide disparities between Bury townships.</li> <li>• Area is semi-rural and remote, designation attracts people to area.</li> <li>• No justification, will result in sprawl and merge distinct towns.</li> <li>• Details on proposed protections for removals not made clear.</li> <li>• It was highlighted that Clarkes Cross (west of M60) has been omitted but could still make a contribution in the form of safeguarded land for long-term needs</li> </ul>

<b>Transport – Highways / Public Transport / Cycling / Walking</b>
<ul style="list-style-type: none"> <li>• Scale of development a concern which will increase traffic due to proximity of motorways and wider growth planned close to site.</li> <li>• Congestion on existing roads e.g. Heywood Old Road already of concern and is mostly industrial traffic which causes property damage. Simister has one access and cannot support high levels of traffic, should be diverted. Dangerous for schoolchildren.</li> <li>• Proposed Birch junction and new road intervention not achievable. Exits onto Heywood Old Road and will therefore make the situation worse. Highways England proposals for Junction 18 should have been shown.</li> <li>• Public transport – Improvements not sufficient. Should extend Metrolink to serve all of site. Rail services in Rochdale at capacity.</li> <li>• Policy lacks detail, need more on junction alterations/ improvements for both local roads and motorways. Must be provided first before any development.</li> <li>• Support – there is good potential for improvements, existing and proposed infrastructure meets needs.</li> </ul>
<b>Physical Infrastructure and utilities</b>
<ul style="list-style-type: none"> <li>• Not viable to provide required infrastructure improvements.</li> <li>• Lack of detail on how development will be serviced.</li> <li>• An electricity transmission route runs through the site and sufficient clearances are required.</li> <li>• The detailed proposals on infrastructure were welcomed by many respondents</li> </ul>
<b>Social Infrastructure</b>
<ul style="list-style-type: none"> <li>• GPs and hospitals cannot cope now. Little detail on how these facilities will be expanded/improved.</li> <li>• Should build new schools on previously-developed land such as former school sites in Middleton area, redevelopment of Castlebrook High School should factor in needs arising.</li> <li>• Local centre siting on main road is unsafe. Should not undermine existing centres.</li> <li>• There was some support for the detailed social infrastructure as outline in the proposal</li> </ul>
<b>Environmental – Green Infrastructure, Biodiversity, open space</b>
<ul style="list-style-type: none"> <li>• Loss of green space that is protected e.g. Simister Wetlands and Bowlee Country Park. Important for exercise.</li> <li>• Loss of green infrastructure and key ecological assets e.g. Bradley Hall Farm, many in decline. Proposed new green infrastructure corridors/enhancements not sufficient, risk of crime.</li> <li>• Loss of fields and key routes/rights of way used by both walkers and horse riders. Key routes and additional suggested routes should be protected.</li> <li>• Lack of information on maintenance.</li> <li>• Support, particularly in relation to drainage and waterbodies.</li> </ul>
<b>Air Quality</b>
<ul style="list-style-type: none"> <li>• Not adequately addressed, no evidence provided.</li> <li>• M62 area is the most polluted area in the country, will make worse.</li> </ul>
<b>Flood risk</b>
<ul style="list-style-type: none"> <li>• Concerns at impact on flood risk in areas with high water table, need to consider underground watercourses.</li> </ul>
<b>Heritage</b>
<ul style="list-style-type: none"> <li>• Sites of historical interest in fields near Prestwich and Blue Ball Lane. Properties from 18th Century on Simister Lane will be damaged by traffic.</li> </ul>



<ul style="list-style-type: none"> <li>• Impact on setting of Heaton Park.</li> </ul>
<p><b>Other</b></p> <ul style="list-style-type: none"> <li>• Agriculture – Loss of working farms and which is contrary to plan’s economic aims of rebalancing economy, important to future. Farm owners have not been notified.</li> <li>• Brownfield – Greater use should be made of empty and underused sites such as the business parks in the local area.</li> <li>• Impact on health and wellbeing/quality of life/amenity from noise/ air/light pollution and disruption, particularly for older people in Brookvale Care Home who require peaceful setting.</li> <li>• Consultation/Presentation of proposals – Politically and financially driven. Proposal needs to be shown in both Bury and Rochdale district sections so it is not missed. Village boundary of Simister needs to be clearly identified.</li> <li>• Green Belt – Inconsistency between level of detail on additions and removals. Removals are insufficient to compensate for loss.</li> <li>• Statement of Common Ground issues – Lack of communication between Bury and Rochdale Councils. Plan does not link up with plans in Merseyside, Lancashire and Cheshire.</li> <li>• Other locations preferable with existing infrastructure in place and fewer constraints e.g. Milnrow, Tameside.</li> </ul>
<p><b>Response to Comments</b></p> <p><u>Principle / scale of development</u></p> <p>The Simister/Bowlee allocation has the potential to deliver around 1,500 homes in order to diversify the type of accommodation across the Simister, Bowlee and Birch and Langley areas. This will include plots for custom and self-build and a mix of housing densities.</p> <p>The allocation forms part of the Northern Gateway and is of a scale to address the central theme of the spatial strategy for Greater Manchester in delivering inclusive growth across the city region complemented by a key aim to boost the competitiveness and economic outputs from the northern parts of the conurbation. The Northern Gateway is one of the key locations that will help to deliver these fundamental objectives. Transport analysis contained in the Locality Assessment has identified necessary mitigation to accommodate any additional traffic generated by the proposed allocation.</p> <p>It should be noted that the extent of GM1.2 Simister/Bowlee allocation has been significantly reduced since the 2019 revised draft version of the GMSF in order to help preserve the character of Simister Village.</p> <p><u>Housing (inc affordable housing)</u></p> <p>Policy GM-H4 covers density of new housing and seeks to maximise average density of new housing in accessible locations. The provision of a range of housing tenures and types is addressed by GMSF thematic policies specifically GM-H2 Affordability of New Housing and GM-H3 Type, Size and Design of New Housing. The allocation policy requires the provision of affordable housing in accordance with local planning policy requirements.</p> <p><u>Employment and Economy</u></p> <p>The allocation policy includes a requirement to ensure that the design and layout allows for effective integration with surrounding communities, including active travel links and connections to local services and the new area of employment at Heywood/Pilsworth (GM1.1). The allocation policy should be read in conjunction with Policy GM-P 1 – Supporting Long Term Economic Growth.</p>

### Green Belt

The policies contained within the GMSF should be read as a whole, in relation to Green Belt Policy GM-10 covers the Greater Manchester Green Belt, the policy should be read in conjunction with the Green Belt Assessment and the Green Belt Exceptional Circumstances justification paper which sets out the case for exceptional circumstances for the Green Belt proposals as a whole and the specific case for this allocation.

### Transport – Highways / Public Transport / Cycling / Walking

Transport analysis contained in the Locality Assessment has identified necessary mitigation to accommodate any additional traffic generated by the proposed allocation. The allocation policy sets out specific requirements for supporting transport services and infrastructure including: an upgrade to the local highway network, traffic restrictions on Simister Lane to prevent this route from being a form of access/egress to and from the allocation, improved public transport provision through the allocation (including Bus Rapid Transit corridors) and close to the allocation (including potential Bus Rapid Transit or Metrolink extension to Middleton) in order to serve the development; and other off-site highway works where these are necessary to ensure acceptable traffic movement. The allocation policy also includes requirements to deliver a network of safe and convenient cycling and walking routes through the allocation designed in accordance with national and GM standards of design and construction.

### Physical Infrastructure and utilities

The allocation policy sets out a specific requirement for a comprehensive masterplan relating to the area to come forward in the plan period that has previously been approved by the LPA(s). The masterplan will include a clear phasing strategy as part of an integrated approach to the delivery of infrastructure to support the scale of the development as a whole. The policy includes a requirement to make provision for other necessary infrastructure such as utilities, broadband and electric vehicle charging points. The policy should also be read in conjunction with the Utility Statement for the Northern Gateway. Capacity and efficient use of utilities and infrastructure is addressed by GMSF thematic Policy GM-D1 Infrastructure Implementation.

### Social Infrastructure

The allocation policy sets out a specific requirement for a comprehensive masterplan relating to the area to come forward in the plan period that has previously been approved by the LPA(s). The masterplan will include a clear phasing strategy as part of an integrated approach to the delivery of infrastructure (including recreation and social infrastructure) to support the scale of the development as a whole. The allocation policy makes provision for a new two-form entry primary school to meet the needs of the prospective school aged residents. There is also a requirement for financial contributions for offsite additional primary and secondary school provision. The policy also includes requirements for a range of supporting and ancillary services and facilities, such as the provision of a new local centre which includes a range of appropriate retail, health and community facilities and ensure that it is integrated with existing communities.

### Environmental – Green Infrastructure, Biodiversity, open space

The policy sets out a requirement to minimise impacts on and provide net gains for biodiversity assets within the allocation in accordance with Policy GM-G10 – A Net Enhancement of Biodiversity and Geodiversity. The policy sets out a requirement for the provision of new, high quality, publically accessible multifunctional green and blue infrastructure to provide health benefits to workers and residents as well as creating a visually attractive environment. The policy includes a requirement to make appropriate provision for the long term management and maintenance of areas of green infrastructure, biodiversity features and other areas of open space. The allocation policy should be read

in conjunction with policy GM-G2 Green Infrastructure Network and Policy GM-G9 Standards for a Greener Greater Manchester and supporting Ecology reports.

#### Air Quality

The policies contained within the GMSF should be read as a whole, in relation to Air Quality this is covered by policy GM-S6 – Clean Air, the GMSF policy should be read in conjunction with the Northern Gateway Noise and Air Quality Constraints Review.

#### Flood risk

Policy GM-S5 covers flood risk and the water environment and makes specific reference to sustainable drainage systems (SuDS) this should also be read in conjunction with the accompanying Strategic Flood Risk Assessment (SRFA) and the Northern Gateway Flood and Drainage Constraints Plan. The allocation policy makes specific reference to mitigating potential flood risk from all sources. The allocation policy includes a requirement to incorporate on-site measures to deal with surface water run-off in line with the hierarchy of drainage options ensuring, wherever possible, they are designed as multi-functional green infrastructure connecting to the wider green infrastructure network in accordance with thematic Policy GM-S5 Flood Risk and the Water Environment.

#### Heritage

The policy sets out a requirement to protect and enhance the heritage and archaeological assets within the vicinity of the allocation and their setting in accordance with the findings of a Heritage Impact Assessment. The allocation policy should be read alongside the Northern Gateway Heritage Appraisal. Heritage is addressed by GMSF thematic policy GM-E2 along with the accompanying GMSF Heritage Environment Background Paper.

**GM Allocation 1.3: Whitefield (Northern Gateway)** (327 comments)

The main issues raised as objections are transport concerns; specifically as existing roads are at capacity and in poor condition and the area is overpopulated, disproportionate loss of Green Belt in this area, loss of trees and wildlife of importance, impact on quality of life from loss of recreation and public rights of way, impact on already stretched social infrastructure, poor drainage and the impact of the proposed local centre on shops in Unsworth.

It is felt that public transport solutions are required including making use of the East Lancashire Railway for passenger services. Also that empty and underused brownfield sites in town centres and low-capacity employment sites should be converted for housing. The landowners are in favour of the allocation and its proposed policy.

<b>Principle / scale of development</b>
<ul style="list-style-type: none"> <li>• Too many homes in an area which is already overpopulated.</li> <li>• Pule Farm should be removed from the proposed layout.</li> <li>• Support – majority of landowners are in favour of the allocation and its proposed policy.</li> </ul>
<b>Housing (inc affordable housing)</b>
<ul style="list-style-type: none"> <li>• Require higher density homes.</li> <li>• Should provide affordable homes and include homes for families and over 65s.</li> <li>• Housing – Bury should offset housing need to neighbouring authorities in Cheshire and Lancashire.</li> </ul>
<b>Green Belt</b>
<ul style="list-style-type: none"> <li>• Disproportionate loss of Green Belt in this part of the Borough, important in maintaining a separation from M66/M62.</li> <li>• Should leave a buffer between new homes and motorway.</li> </ul>
<b>Brownfield</b>
<ul style="list-style-type: none"> <li>• Brownfield - Should convert empty and underused brownfield sites in town centres instead and/or bring forward low-capacity employment sites in area for housing such as Pilsworth.</li> </ul>
<b>Transport – Highways / Public Transport / Cycling / Walking</b>
<ul style="list-style-type: none"> <li>• Existing roads are at capacity and in poor condition. Severe traffic congestion at Simister Island. Scale of development a concern which will increase traffic due to proximity of motorways and wider growth planned close to site.</li> <li>• The proposed link road will add to congestion problems in a residential area that is already overpopulated.</li> <li>• More information needed on junction alterations/improvements for both local roads and motorways and impact on public access on foot and by cycle.</li> <li>• Public transport solutions are required. Proposals in Northern Gateway justify a new Bury – Oldham Metrolink line.</li> <li>• It was felt that developers are likely to renege on their responsibility</li> <li>• Transport – Build more ring roads. Revisit traffic light technology. Should make use of East Lancashire Railway for passenger services.</li> <li>• Concern over traffic noise, there is little evidence/justification</li> <li>• Support – Detailed proposals on infrastructure welcomed.</li> </ul>
<b>Physical Infrastructure and utilities</b>
<ul style="list-style-type: none"> <li>• Upgrades required to utilities and need more clarity on when this will be delivered.</li> <li>• Support – Detailed proposals on infrastructure welcomed.</li> </ul>
<b>Social Infrastructure</b>
<ul style="list-style-type: none"> <li>• Large number of schools in area and these are over-subscribed.</li> <li>• Health services are stretched, new health centre required.</li> </ul>

<ul style="list-style-type: none"> <li>• Need for multi-purpose community facilities.</li> <li>• Impact of the proposed local centre on shops in Unsworth.</li> <li>• Support – Detailed proposals on infrastructure welcomed</li> </ul>
<p><b>Environmental – Green Infrastructure, Biodiversity, open space</b></p>
<ul style="list-style-type: none"> <li>• Loss of trees.</li> <li>• Loss of wildlife areas which should be considered for designation.</li> <li>• Loss of recreation at Boz Park and impact on quality of life. Should be upgraded/complemented with new recreation facilities.</li> <li>• Loss of public rights of way.</li> <li>• No leisure facilities proposed, need for indoor leisure.</li> <li>• Lack of detail/further evidence required e.g. Ecological Impact Assessment, which recreational facilities to be enhanced, impact of link road on school playing fields.</li> </ul>
<p><b>Air Quality</b></p>
<ul style="list-style-type: none"> <li>• Will increase carbon emissions in Simister Island area which is already an area with high levels of air pollution in region.</li> <li>• Lack of evidence of the effect on air quality of the development.</li> </ul>
<p><b>Flood risk</b></p>
<ul style="list-style-type: none"> <li>• Poor drainage, land boggy in south. Proposals can only increase risk.</li> </ul>
<p><b>Other</b></p>
<ul style="list-style-type: none"> <li>• Loss of residential amenity, will devalue properties.</li> <li>• Loss of views.</li> <li>• Issues of privacy and security for existing residents.</li> </ul>
<p>GMSF 2019 Policy GM Allocation 1.3: Whitefield (Northern Gateway) has been removed and is not proposed as a strategic allocation in GMSF 2020.</p>

**GM Allocation 2: Stakehill** (984 comments)

Overwhelming objection to the proposal of building on a significant proportion of the Green Belt for additional employment and housing. In terms of employment the concern is that the majority of these jobs would be low paid and low skilled within warehousing and manufacturing. There is a lack of demand for further industrial warehousing/units within the area beyond the existing employment areas of Stakehill and Broadgate Industrial Park where a large number of units still remain unoccupied. Further evidence and work needs to be done to justify the demand.

There are key concerns about how the new additional homes proposed north of Thornham St. John’s would place a considerable amount of pressure on existing, and in some instances inadequate infrastructure which could exacerbate issues around drainage, sewers and flooding measures.

There is support for providing adequate infrastructure such as schools, hospitals and doctors before development can take place, in order to ensure that community facilities can accommodate and manage the additional capacity/subscription either through an expansion of the existing site or provision of a new facilities.

Concerns that the creation of higher value properties will price out local people who are not able to afford the new homes and benefit the wealthy – an imbalance is created between the low skilled/low paid jobs being offered through the proposal and the inability of local people being able to buy a property within their area.

A large number of residents raised concerns regarding existing heavy congestion, particularly during peak times, on A627M, A664, Mills Hill lane, Elk Mill Retail Park, Middleton Road, Haigh Lane, Boarshaw road and Boarshaw Lane. It was assumed by many that the development would result in an increase of 1400 cars on these local roads making the congestion much worse. Although the site can be accessed using public transport, an increase in cost of the train from Mills Hill is taking this mode of transport out of the option for a lot of working class people. The new charging tariffs on the Metro is also discouraging people from taking public transport.

The issue of air pollution was a concern for many residents. Sections of the A664 (Rochdale Road and Manchester Road) and A627M falls within an Air Quality Management Area and already exceeds air pollution guidelines. This development and the resulting increased number of cars will increase the level of pollution, impacting on people’s health.

The industrial manufacturing of farming needs to be taken into account and considered for future growth including dairy pasteurising, bottling delivering fresh milk daily another using a milk tanker, another beef pigs turkey eggs. In addition, there are fields which are productive, and suitable for cereals, sugar beet, potatoes; this could be valuable especially as we may not be importing much produce from the EU.

<b>Principle / scale of development</b>
<ul style="list-style-type: none"> <li>• With an established industrial estate and good access to motorways development at this site would be logical.</li> <li>• Green Belt land should be protected and not built on.</li> </ul>
<b>Housing (inc affordable housing)</b>
<ul style="list-style-type: none"> <li>• There is a need for affordable housing but without covering all of the Green Belt, leaving areas where people can walk, cycle, ride safely, breathe fresh air, places locally without having to travel 40/50 miles to the coast or National Parks.</li> </ul>

<ul style="list-style-type: none"> <li>• No justification for the urbanisation and industrialisation of the Northern areas as the figures are based on based on over-inflated housing target</li> <li>• General disagreement with how the Local Housing Need has been calculated and with Rochdale's housing target being higher than its Local Housing Need.</li> <li>• By raising the 'competitiveness' of the areas within GM, associated costs of living will rise such as rent and house prices which are currently affordable. This in itself will mean the Northern Area will lose its competitive edge when people are deciding where in GM they should settle.</li> <li>• The Green Belt sites would not be providing housing for local people.</li> </ul>
<p><b>Employment and Economy</b></p>
<ul style="list-style-type: none"> <li>• A huge area of Green Belt will be sacrificed for low paid low skilled jobs in warehousing. There is a lack of demand for further industrial warehousing/units within the area beyond the existing employment areas of Stakehill and Broadgate Industrial Park where a large number of units remain unoccupied.</li> <li>• Support for long term, fulfilling careers for the local population and a Technology Park or an area creating high volume well paid jobs.</li> <li>• The employment space needs to be ring fenced for high tech green technology and not just more low income warehousing space.</li> </ul>
<p><b>Green Belt</b></p>
<ul style="list-style-type: none"> <li>• A strategic area of Green Belt should be added on the east side next to the A627(M) and the north side next to the M62 / Thornham New Road to maintain separation between this new urban area and its surroundings.</li> <li>• Losing this invaluable Green Belt will just increase urban sprawl bringing Oldham and Rochdale into one built up area</li> <li>• Exceptional Circumstances have not been demonstrated to remove land from the Green Belt and no Green Belt review has taken place.</li> </ul>
<p><b>Brownfield</b></p>
<ul style="list-style-type: none"> <li>• Not enough attention has been given to identifying brownfield sites towards the city centre i.e. Oldham Road / Rochdale corridors.</li> <li>• Brownfield land should be brought up to a deliverable state as should contaminated land/buildings.</li> <li>• A 'brownfield first approach' should be adopted unlike the 'brownfield approach' which does not afford Green Belts the same protection.</li> <li>• A brownfield site has been put forward for inclusion in the allocation boundary. This site could deliver around 100 new homes and provide a suitable access point.</li> <li>• Remediation of difficult/toxic brownfield sites across Greater Manchester, no matter how large or small, should be undertaken before considering Green Belt or green space for development. Money for brownfield site remediation must be found in the short to medium term, from either Central, Regional or local Council sources so that these sites are not left for future generations to deal with.</li> </ul>
<p><b>Transport – Highways / Public Transport / Cycling / Walking</b></p>
<ul style="list-style-type: none"> <li>• Building in this area will significantly increase the traffic around the already congested area of the A627M, A664M, Mills Hill lane, Elk Mill retail park, Middleton Road, Haigh Lane, Boarshaw road and Boarshaw Lane.</li> <li>• Mills Hills station is already overcrowded in rush hour with people unable to board a number of the trains that pass through at these times. Adding an extra station will only make this worse, I am also sceptical that any improvement will be made to public transport.</li> <li>• The drastic increase in cost of the train from Mills Hill is taking this mode of transport out of the option for a lot of working class people. The new charging tariffs on the Metro is also discouraging people from taking public transport.</li> </ul>

<ul style="list-style-type: none"> <li>• Increased traffic on Rochdale Road, Rochdale Lane, Dogford Road, Oozewood Road and surrounding roads in Royton would undoubtedly add to the Road Safety danger.</li> <li>• Public Transport in this area is extremely poor, inefficient and never runs to the scheduled timetable. With no direct access to the Metrolink or Train Services meaning residents have to drive/catch bus/walk long distance to the Metrolink /train stop in Shaw, Oldham, Middleton, and Rochdale causing increased pollution.</li> <li>• The roads are already congested; junction 21 has the highest recorded levels of nitrogen dioxide a further potential 1400 cars will only add to this.</li> <li>• The M62 is already one of the most congested and polluting motorways in the Country.</li> </ul>
<p><b>Physical Infrastructure and utilities</b></p>
<ul style="list-style-type: none"> <li>• This is a large increase in both employment and housing, concerned how the infrastructure will actually cope with this.</li> <li>• Road infrastructure needs to be improved to support any expansion.</li> </ul>
<p><b>Social Infrastructure</b></p>
<ul style="list-style-type: none"> <li>• St. John's CE Primary School is currently oversubscribed and pupil admission number (PAN) has increased in response to current demand.</li> <li>• Ensure the provision of additional school places either through an expansion of existing primary and secondary schools or through new provision within the site, including the expansion of Thornham St John's Primary School located within the allocation; - the school is on a single track road, which can't be widened without knocking down houses on either side of the road.</li> </ul>
<p><b>Environmental – Green Infrastructure, Biodiversity, open space</b></p>
<ul style="list-style-type: none"> <li>• The loss of huge amounts of the Green Belt will have a detrimental impact and loss on amenity for the local communities in regards to walking, hiking, horse riding, running, cycling.</li> <li>• Detrimental impact on the local wildlife population, degradation of habitat, plant-life especially pollen producing plants and grasses.</li> <li>• Concerns over the proximity of the development to Chadderton Park, residential areas and green space.</li> <li>• The development of this area will increase pollution and the risk of flooding</li> </ul>
<p><b>Air Quality</b></p>
<ul style="list-style-type: none"> <li>• Impact upon the air quality – increased congestion around the A627M, A664M, Mills Hill lane, Elk Mill Retail Park, Middleton Road, Haigh Lane, Boarshaw road and Boarshaw Lane will increase the air pollution within the area. This will negatively have an impact on general health within the area.</li> <li>• It remains to be seen how you plan to reduce emissions when you are proposing such vast expansions of the urban landscape. Any reductions in existing emissions will be matched — if not exceeded — by the proposed increase of the 'new' businesses — and households – GMSF seeks to attract.</li> </ul>
<p><b>Flood risk</b></p>
<ul style="list-style-type: none"> <li>• The loss of trees and natural ground cover on this site will worsen the flood problem within Thornham Old Lane.</li> <li>• The current water supply, drainage and sewer systems that would be expected to serve the Thornham Old Road site, which adjoins this proposed development date from the 19th century and are already at full capacity. A recent sewer collapse closed the main Rochdale Road between Oldham, Royton and Rochdale for a week adjacent to this proposed site</li> </ul>
<p><b>Heritage</b></p>
<ul style="list-style-type: none"> <li>• Ensure that the design of the scheme preserves or enhances the setting of the listed St John's Church and war memorial.</li> </ul>



<ul style="list-style-type: none"> <li>• Visual amenity and overall aspect of surrounding land, Hamlets and view of the site will change significantly</li> </ul>
<p><b>Other</b></p> <ul style="list-style-type: none"> <li>• A brownfield site has been put forward for inclusion in the allocation boundary, this offers a key opportunity to enhance the deliverability and could come forward within the initial phase, design and function of the wider GMA2 development. This land could deliver in the region of 100 new homes and within the short term, contribute to overall delivery of around 1,000 from this allocation.</li> <li>• Lack of investigation into other possibilities such as an alternative location for warehousing at junction 22 of the M62 having smaller impact on local community</li> <li>• Have all the land owners and home owners already agreed to a compulsory purchase? Because the financial rewards will persuade them to support this.</li> <li>• The industrial manufacturing of farming needs to be taken into account and considered for future growth including dairy pasteurising, bottling and delivering fresh milk daily, using a milk tanker and the fields with sheep in the winter.</li> <li>• There are fields which are productive, soil classified as 55 ID Newport 1, suitable for cereals, sugar beet, potatoes; this could be valuable especially as we may not be importing much produce from the European Union.</li> <li>• Raising the awareness of consultation has been poor.</li> </ul>
<p><b>Response to Comments</b></p> <p>The site selection paper identifies that Stakehill meets criteria 3 and 5.</p> <p>The case for exceptional circumstances is set out for the Green Belt proposals as a whole and the specific case for this allocation in the accompanying Green Belt Topic Paper.</p> <p>The justification for the housing figures are set out Policy GM-H 1 and the support background evidence including the GM Strategic Housing Market Assessment 2020.</p> <p>The GMSF prioritises the use of brownfield land. However it acknowledges that in order to meet the housing and employment needs selective release of Green Belt is necessary.</p> <p>Transport analysis contained in the locality assessment has identified necessary mitigation to accommodate any additional traffic generated by the proposed allocation.</p> <p>Objective 9 of the GMSF seeks to ensure that new development is properly served by social and physical infrastructure including schools, health, social care, sports and recreation facilities. Specific criteria is also included in the policy to ensure the proposal delivers the social infrastructure is delivered to meet the needs of new and existing communities.</p> <p>The policy acknowledges the need to take account of areas of biodiversity in and adjacent to the site and includes the requirement to carry out a project specific habitats regulations assessment. Policy GM-G 9 covers the concept of net gain with respects to Green Infrastructure and biodiversity.</p> <p>The Integrated Appraisal (IA) identifies that the allocation is within 150m of an existing AQMA. The policy include the need to incorporate appropriate noise and air quality mitigation along the motorway corridors.</p> <p>The site has been covered by the GM Strategic Flood Risk Assessment which has considered all the allocations in respect of flood risk and water management and no significant issues have been identified.</p>

The policy includes the need to ensure the design of the scheme preserves and enhances the setting of the listed St Johns Church and War Memorial. Heritage and archaeological screening has been undertaken by the University of Salford Archaeology Team.

Other concerns raised by consultees are covered by the allocations policy, other GMSF policies or Local Plan policies.

**GM Allocation 3: Kingsway South** (2,020 comments)

It was felt that the homes proposed do not match the proposed jobs. With regards to highways , there is already congestion around junction 21 and surrounding villages / roads, additional traffic cannot be supported. The need for employment is recognised but it was highlighted that Kingsway Business Park is not at capacity and that there is no clear justification for the demand in new employment. There were also concerns the any additional jobs created will be low paid.

Rather than housing it was felt that the Green Belt would be better used for tourism and farming – with an increased need to produce more food. There are also major concerns raised with the loss of ecology in the area, a loss of identity and heritage and the visual impact on the landscape with the development being in an elevated position and thus being seen for miles. With regards to flood risk and water it was highlighted that the area is in a Groundwater Source Protection Zone and that this needs to be referenced in the policy

<b>Principle / scale of development</b>
<ul style="list-style-type: none"> <li>• Huge amount of Green Belt loss around this area.</li> </ul>
<b>Housing (inc affordable housing)</b>
<ul style="list-style-type: none"> <li>• Used outdated figures to calculate housing need.</li> <li>• Housing target is above the housing need figure.</li> <li>• Do not support luxury executive homes. Will push people out of the area.</li> <li>• Need low cost, higher density housing on brownfield land.</li> <li>• Urban regeneration should be prioritised with terraced houses developed.</li> <li>• There are sufficient brownfield sites and a high number of empty properties.</li> <li>• Welcome the reduction in housing numbers on the site.</li> <li>• Scale of housing is too low to ensure affordable housing needs are met. Needs to align with employment strategy.</li> <li>• Policy should allow financial contribution towards affordable housing in lieu of off-site provision. Viability should be taken into account.</li> <li>• Will provide a mix of housing to address local need.</li> <li>• No reference is made to the provision of affordable housing.</li> </ul>
<b>Employment and Economy</b>
<ul style="list-style-type: none"> <li>• Objections regarding Kingsway having empty units (as with surrounding estates) and still being developed. The site is not at capacity.</li> <li>• No evidence what the industries will be, that Kingsway South has benefitted the area so far and what the plans are to attract businesses?</li> <li>• Questions regarding the number and type of jobs that will be created?</li> <li>• Warehousing industry is expected to decline.</li> <li>• May free up units such as in Shaw Centre for housing.</li> <li>• Will attract low numbers of low paid jobs.</li> <li>• Do not know what will happen post -Brexit.</li> <li>• Enough employment space already.</li> <li>• The development could assist with employment opportunities.</li> <li>• No vision for the economy.</li> <li>• Business rates will not benefit Oldham.</li> <li>• Area makes sense for commercial buildings.</li> <li>• Opportunity to enhance an established employment site. Will provide much needed employment floorspace. Site is reaching capacity.</li> <li>• Evidence shows there is not enough supply within the North West to meet the market demand for employment.</li> </ul>

<p><b>Tourism:</b></p> <ul style="list-style-type: none"> <li>• Green Belt would be better utilised for tourism with the proximity of Ellenroad Mill.</li> <li>• Walking tours suggested.</li> <li>• Newhey Quarry could be a sports adventure site.</li> </ul>
<p><b>Green Belt</b></p> <ul style="list-style-type: none"> <li>• Would like the Green Belt protected.</li> <li>• Plans will degrade the area. Loss is appalling. Chose to live in this area because of the countryside.</li> <li>• There will be no green corridor between Oldham and Rochdale.</li> <li>• The development on Shaw's, Royton and Crompton's Green Belt is disproportionate. Saddleworth been left untouched.</li> <li>• OPOL's should have been upgraded to Green Belt in the North West of the borough.</li> <li>• No exceptional circumstances. Economic growth is not an exceptional circumstance. Very little gain.</li> <li>• The proposed reallocation of the Green Belt includes the football pitches at Cardinal Langley school which are inaccessible to the public.</li> <li>• Reclassifying recreation areas such as Firgrove playing fields and Queens Park Heywood to Green Belt to appear as if there is less green belt loss is ludicrous.</li> <li>• Retaining a strategic area of Green belt is a token effort.</li> <li>• The Green Belt retained is contaminated.</li> <li>• Identifying so much Green Belt de-designation over a 20-year period is unreasonable, given the uncertainties. Suggest 15-year period.</li> <li>• Land is used by ridings schools and stables.</li> <li>• Site is farmland. Plan gives no regard to local farming industry. Will result in loss of employment, displaced families and an increase in food miles.</li> <li>• Should not protect all greenfield sites automatically – each site should be assessed on its own merits.</li> </ul>
<p><b>Brownfield</b></p> <ul style="list-style-type: none"> <li>• Question whether brownfield land costs too much. Comments that developers are cherry picking land to build high price easily sellable housing, with less cost to build rather than remediating brownfield land.</li> <li>• Abandoning the mess is not acceptable. Developers should assist with developing brownfield sites.</li> <li>• Would like to see GMCA push the government for support to remediate contaminated land, to provide funding for infrastructure and to support alternative models of housing delivery.</li> <li>• Comments requesting that brownfield land, empty properties, mills and town centres are explored. Have a duty to exhaust brownfield sites first.</li> <li>• There is a high number of empty properties.</li> <li>• Provide homes by public transport links.</li> <li>• Question regarding how many homes will be available to older people and people with disabilities. Should be making places dementia friendly.</li> <li>• The plan should cover 15 years, which would result in a lower housing figure.</li> <li>• The SHLAA is not a finite supply of land, other plots will become available over time.</li> <li>• A mix of different sites are required to ensure housing needs are met.</li> </ul>
<p><b>Transport – Highways / Public Transport / Cycling / Walking</b></p> <ul style="list-style-type: none"> <li>• M62, A664 / Elizabethan Way will be more congested.</li> <li>• Junction 21 through to Eccles is gridlocked.</li> <li>• Traffic volume and noise through Newhey, Milnrow, Littleborough, Smithy Bridge, Royton and Shaw is excessive.</li> <li>• Congestion causes delays and stress impacting on mental health and well being.</li> </ul>

- Railway crossing is down 15 minutes per hour. Additional cars will add congestion.
- Can feel vibrations from traffic on the B6194.
- Ladyhouse Estate has one access road. If there was an accident emergency services would struggle to access with congestion.
- Kiln Lane and Bentgate Street have issues with school traffic.
- Number of large trucks will increase as well as thousands more cars.
- Request for an independent traffic and transport impact assessment.

Access:

- Policy does not provide detail on the scale and type of improvements required at Junction 21.
- Scale of the allocation is a concern because it gives rise to impacts on an individual and cumulative perspective due to proximity to M62 Junction 21 and the M62 corridor.
- No space on the motorway for more cars.
- Greenhill Avenue and Mossgate Road are not wide enough to cope with increased traffic. Mossgate road is a farmers track and is narrow. Cars struggle to turn onto Rochdale Road.
- Greenhill is a busy cul-de-sac. Would result in a busier road.
- Wagons use Shaw Road / Milnrow Road as a main route.
- The modified junction from the M62 with additional traffic will increase issues in Milnrow and Newhey.
- Broad Lane is a rural road. It needs new foundations already. Road cannot take further traffic.
- The plan looks as if access will enter a small cul de sac at the back of the park. Access from this road onto Rochdale Road is a blind spot.
- Already accessible.
- Access roads are too narrow.

Road Safety:

- Close proximity of access roads to Newhey County Junior and Primary School.
- More vehicles parking on B6194 will make it more difficult for traffic coming out of the side streets to see the traffic.
- No pavement on Mossgate Road and becomes a single track for farmers only.
- Mossgate Road alleyway would become less safe to use.
- Accidents around Junction 21 of the M62 are regular.
- Crompton School and other schools – no where for parents to pick up from.
- Concern about vibrations from vehicles.

Active travel:

- GRA3 is an ideal opportunity to create cycle routes linking Shaw and Kingsway. Request to work with Bee Network to ensure that allocation has a safe cycle link to Shaw.
- Cycle paths / recreational routes need to be protected.
- Development requirement 7 – to create safe active routes - these should be greened.

Public Transport:

- Question on how the bus service can be upgraded along the A627.
- Poor transport is poor. Fewer and less frequent buses. Don't run in the evenings or on Sundays. Bus journey times have increased due to congestion.
- Increased capacity and frequency of Metrolink will be needed. The Metrolink is overcrowded.
- Parks and Ride's do not have enough car parking spaces.
- Kingsway Metrolink stop is remote and unsafe to access.

<ul style="list-style-type: none"> <li>• Can't access Metrolink stops by foot so have to drive adding further congestion. Broad Lane is too dangerous to cycle on.</li> <li>• Trains don't run on time and are overcrowded.</li> <li>• No public transport plan / not enough consideration.</li> <li>• New residents will not be close to train, Metrolink and bus stops.</li> </ul>
<p><b>Physical Infrastructure and utilities</b></p> <ul style="list-style-type: none"> <li>• Need to use green energy, including for public transport.</li> <li>• Development and supporting infrastructure, including water will require more energy use.</li> <li>• Renewable energy requires back up by conventional sources.</li> <li>• Renewable energy can have environmental impacts and associated access roads can attract bikers.</li> <li>• Against wind farms.</li> <li>• All new developments should incorporate solar panels or are passive design.</li> <li>• No regard to cumulative adverse effects on infrastructure. When there will have significant impact on the demand for water, gas, electricity and telecommunications.</li> </ul>
<p><b>Social Infrastructure</b></p> <ul style="list-style-type: none"> <li>• Will overwhelm infrastructure.</li> <li>• No specific plans for infrastructure expansion such as schools and health facilities and associated staff. Children will be expected to travel further.</li> <li>• Have to wait weeks for an appointment currently. At full capacity.</li> <li>• Schools are oversubscribed.</li> <li>• Travel far already for a dentist.</li> <li>• Ageing population will mean that access to health care will be even more important.</li> <li>• Recent developments have not contributed towards health infrastructure.</li> <li>• Need good schools to attract high paid people.</li> <li>• Question whether hospitals would cope.</li> <li>• Sufficient community facilities needed. Lack of leisure facilities already and poor health facilities.</li> <li>• Pressure on social services and policing.</li> <li>• Question regarding where accessible food shops will be located.</li> <li>• Request for legally binding agreements to ensure infrastructure is delivered.</li> </ul>
<p><b>Environmental – Green Infrastructure, Biodiversity, open space</b></p> <ul style="list-style-type: none"> <li>• Impact on wildlife raised, including rare species. Includes Site of Biological Importance (SBI).</li> <li>• Need area for food sources.</li> <li>• Different types of species listed. Over 1000 species present on site.</li> <li>• Not an environmentally friendly plan.</li> <li>• Increased traffic and pollution, as well as loss of green belt, affects wildlife.</li> <li>• UK has biggest decline in hedgehog populations since records began. Hedgehogs need hedges.</li> <li>• Request for trees and shrubs to be planted on the south side of the M62.</li> <li>• Plan will weaken climate change and go against Northern Forest Plan and Natural Capital Committee Plans.</li> <li>• Public Right of Way would be impacted upon.</li> <li>• Net gains can be applied to green infrastructure, deciduous woodland and protected species.</li> </ul> <p>Landscape:</p> <ul style="list-style-type: none"> <li>• Site topography means that the development would be very visible.</li> <li>• Impact on setting will have unacceptable impact.</li> </ul>

- Existing Kingsway Business Park units are unsympathetic to the surrounding environment. Proposed development would be the same.
- Will not be possible to minimise the development's visual impact.
- Site is currently beautiful with unique landscape.

Open space:

- Large green spaces are needed for long walks, including for dog walkers, horse riders and runners. Need access to recreation and accessible green belt. Will not feel like the countryside.
  - Question regarding where children will play?
  - Need for Local Green Spaces.
  - Loss of green space will impact on mental and physical well being. Poor health around the site area. Exercising outdoors is important.

**Air Quality**

- Worsened air quality will be concentrated in one area.
- High pollution levels already. Further development will exasperate this.
- Will increase miscarriages, deaths and asthma and other illnesses.
- Warehouses will bring large polluting vehicles.
- Questions on how we will be a carbon neutral city and how plans conform with Clean Air Plan.
- Worsened air quality will add to NHS pressures.
- Request for independent air quality impact assessment.
- Want evidence of how mitigation measures will work.
- Recommendation for substantial woodland buffers.
- If mitigation fences are installed they will end up covered in graffiti.

**Flood risk**

- Land to the south of the Beal is a flood plain.
- Area has flooded previously.
- No flood mitigation plans.
- Want an assessment of the impact of flooding.
- Will lead to increased flood risk elsewhere.
- Impacts on education when schools are shut due to floods.
- Land previously contained a reservoir and quarries.
- Issues raised with flood risk from surface water and sewer flooding.

Water supply / quality:

- Flow of water to minor watercourses is important. Concerned about water being drained away from Stanny Brook, removing its environmental contribution.
- Area is within a groundwater source protection zone 2 for a public water supply abstraction. Records of private supplies too. Policy must ensure development considers the vulnerability of the land and propose suitable mitigation measures to reduce risk of pollution. Policy wording recommended. Planning applications will need hydrological assessments.
- Amended wording recommended for enhancing the River Beal as part of the overall green infrastructure strategy for the site.

**Heritage**

- Buildings of historical interest at land at Burnedge.
- Suggest maintaining a band of Green Belt either side of the unadopted lane (by Burnage) to prevent urban sprawl and to protect the heritage sites in the area.
- Whitfield dairy is a place of historical interest.
- Concern over impact on heritage and sense of place / loss of identity.

**Other**

- Question whether the mine shafts are not in this area.
- Request that consideration is given to the possibility of gases present in the disused mines.
- Air, noise and light pollution.
- Link between 'excess development' and higher crime rates.
- Significant comments on the consultation regarding inconsistency with viewing the concept plans, the presentation of the plan making it difficult to find the proposed allocation, feelings that the consultation did not meet the Statement of Community Involvement and not taking on board the feedback from the 2016 consultation.
- Not enough hard facts.
- The plan does not link with the plans of surrounding authorities – i.e. Lancashire and Cheshire.
- Letters of support from Landowners. Sites are available, suitable and achievable.

**Response to comments:**

GMSF 2019 Policy GM Allocation 3 Kingsway South has been removed and is not proposed as a strategic allocation in GMSF 2020.

Instead, Policy GM-Strat 7 North East Growth Corridor identifies High Crompton Broad Location. The indicative location, which only covers that part of the former GM Allocation 3 Kingsway South which falls within the Oldham Boundary is identified on the GMSF 2020 Key Diagram.

High Crompton Broad Location will remain in the Green Belt until such time that a review of the GMSF and / or the Oldham Local Plan can demonstrate that it is fully justified.

The opportunity presented by the High Crompton Broad Location would serve to meet future employment and housing needs and demand of businesses and local communities in this part of the conurbation well beyond the end of the plan period. Well designed, sustainable development at High Crompton Broad Location would diversify further the employment and housing offer in Oldham by ensuring truly inclusive growth could be achieved which would help to reduce further the levels of deprivation and poverty



### 3.2.2. Strategic Allocations in Bolton

There are 3 allocations in Bolton and these received 415 comments in total.

#### **GM Allocation 4: Bewshill Farm** (69 comments)

There was some support for this allocation due to it being a natural extension of the Logistics North employment site. The main issues raised as objections are the loss of green belt, especially with adequate vacant brownfield sites able to accommodate employment, increased traffic, flood risk and pollution, decline in wildlife habitats and reduction of green spaces leading to poorer mental health.

There were particular recommendations including stronger references regarding Sustainable Drainage Systems and Green Infrastructure. There was also particular reference to the loss of grade 3 farmland and reference to the inclusion of a safe, accessible, sustainable transport scheme as part of the policy.

Suggested alternative strategies include various ways of protecting the green belt such as identifying brownfield sites to accommodate employment, filling unused industrial units at Logistics North and Wingates, reducing the plan period so that there is sufficient supply, and the provision of high-quality landscaping for stronger protection and buffering of the Cutacre Brook Site of Biological Importance

<b>Principle / scale of development</b>
<ul style="list-style-type: none"> <li>The proposals are not based on factual and recent data regarding the amount of warehousing spaces and homes required in the area.</li> </ul>
<b>Employment and Economy</b>
<ul style="list-style-type: none"> <li>Westhoughton has too much industrial development.</li> </ul>
<b>Green Belt</b>
<ul style="list-style-type: none"> <li>Concern over the loss of green belt land for employment sites.</li> <li>Industrial development will encroach on the countryside.</li> <li>Developing on green belt means the air quality will suffer and as a result, we will not be giving future generations a greener city.</li> </ul>
<b>Brownfield</b>
<ul style="list-style-type: none"> <li>Adequate brownfield sites are available to accommodate employment provisions.</li> </ul>
<b>Transport – Highways / Public Transport / Cycling / Walking</b>
<ul style="list-style-type: none"> <li>Development will increase heavy traffic into the area, which will worsen the existing congestion.</li> <li>The potential considerable increase in HGVs via the M61 and A6 and other commuting traffic due to the proposals would disrupt existing neighbourhoods.</li> <li>There should be safe, accessible and sustainable transport included as part of the policy.</li> </ul>
<b>Physical Infrastructure and utilities</b>
<ul style="list-style-type: none"> <li>Existing infrastructure cannot cope with new developments. Infrastructure will need to improve before any further units are built.</li> <li>Allowing development on green belt land will require digging up to provide power, internet and sewage systems. This will lead to delays on the road network, which will affect existing businesses and possibly lead to reduction in revenue.</li> </ul>
<b>Environmental – Green Infrastructure, Biodiversity, open space</b>

<ul style="list-style-type: none"> <li>• Concern over decline in wildlife and habitats due to green belt loss.</li> <li>• The reduction in green spaces will lead to poorer mental health.</li> <li>• Development will cause a loss of grade 3 farmland, which will harm the rural economy.</li> <li>• No reference to the Cutacre Brook, which flows through the middle of Bewshill. Landscaping should buffer the green infrastructure to the east and west and ensure biodiversity gain. It should buffer Cutacre Brook SBI and amphibian populations to the south of the proposed allocation.</li> </ul>
<p><b>Air Quality</b></p> <ul style="list-style-type: none"> <li>• Concern of increased pollution, particularly that Bolton and Farnworth have the 10th highest admission rates into hospital and are the 50th most congested in EU.</li> <li>• The Council should take responsibility for pollution from such developments.</li> <li>• Development will cause more light and noise pollution.</li> </ul>
<p><b>Flood risk</b></p> <ul style="list-style-type: none"> <li>• Concern over increased flood risk as development will reduce natural drainage.</li> <li>• There is no reference to the use of Sustainable Drainage Systems (SuDS).</li> </ul>
<p><b>Other</b></p> <ul style="list-style-type: none"> <li>• Some support for the allocation as it is a natural extension of the Logistics North employment site.</li> </ul>
<p><b>Response to comments</b></p> <p>Policy GM-P4 covers the requirement for additional industrial and warehousing sites to meet the overall identified need which is evidenced by the districts' strategic employment land availability assessment and the Employment Land Demand Paper.</p> <p>Policy GM-G 10 defines the need to deliver the positive long-term outcomes of the GM strategy as exceptional circumstances which justify the strategic altering of the GM Green Belt, with justification set out in the Green Belt Topic Paper. Policy GM-Strat 6 states that the release of Green Belt in 'Northern areas' of GM to boost economic opportunities is required.</p> <p>The site selection topic papers cover the criteria for site selection which have been informed by the objectives of the GMSF. The selected sites meet site selection criteria 3 to maximise existing economic opportunities.</p> <p>The Stage 2 Greater Manchester Green Belt Study provides an assessment of the impact on the Green Belt resulting from the allocation and the overall harm to Green Belt purposes from the release of land.</p> <p>Transport analysis contained in the Locality Assessment has identified necessary mitigation to accommodate any addition traffic generated by the proposed allocation. Policies GM-N4 and GM-N5 cover the requirement for development to make a positive contribution to the quality of place and support high levels of walking, cycling and public transport.</p> <p>Policy GM-D 1 covers the plan to work directly with infrastructure providers to ensure that investment plans are consistent with the GMSF.</p> <p>Policy GM-Strat 13 states that the protection and enhancement of green infrastructure assets will be complemented by a suite of policies enabling GM's residents to access and maximise the benefits of GI on health and wellbeing.</p> <p>Policy GM-E 6 requires new development which requires an EIA to be supported by a Health Impact Assessment also.</p>

Policy GM-G 9 states that across the plan a net enhancement of biodiversity sources will be sought, and will follow the hierarchy of avoiding harm, mitigation and compensation. The policy also states that the best and most versatile agricultural land will be safeguarded.

The Identification of Opportunities to Enhance the Beneficial Use of the Green Belt report identifies Cutacre Brook as a biodiversity and wildlife corridor.

Policy GM-S 2 states the aim of delivering a carbon neutral Greater Manchester no later than 2038. Policy GM-S6 sets out a range of measures which will be taken to support improvements in air quality. Policy GM-N4 also requires the mitigation of the impacts of air and noise pollution and carbon emissions from road transport. Paragraph 180 of the NPPF covers the requirement of development to limit the impact of light pollution on local amenity and intrinsically dark landscapes.

Policy GM-S 5 requires developments will be located and designed to minimise the impacts of current and future flood risk, and to use sustainable drainage systems. The GM Strategic Flood Risk Assessment (SFRA) covers issues of flood risk and sustainable drainage system.

**GM Allocation 5: Chequerbent North** ( 77 comments)

The main issues raised as objections are traffic concerns, specifically at the already congested Chequerbent roundabout, increased flood risk and noise and air pollution, loss of green belt, especially with adequate vacant brownfield sites able to accommodate employment, decline in wildlife habitats, removal of farmer’s livelihoods and reduction of green spaces leading to poorer mental health. There are also numerous references to Bolton’s Allocations Plan up until 2026, where the Planning Inspectorate determined there to be no need for further Green Belt amendments.

There was some support highlighting the key strategic location of the Wigan-Bolton growth corridor. There were recommendations including the need for stronger references regarding Sustainable Drainage Systems , the protection and enhancement of the watercourse network and the requirement to deliver a net gain as part of the strategic approach to site delivery. There was objection due to the loss of grade 3 farmland and reference to previously rejected allocations.

Suggested alternative strategies include various ways of protecting the green belt such as identifying brownfield sites to accommodate employment, filling unused industrial units at Logistics North and Wingates, reducing the plan period so that there is sufficient supply and ensuring net biodiversity gain by protecting Chanters Brook.

<p><b>Principle / scale of development</b></p> <ul style="list-style-type: none"> <li>• In Bolton’s Allocations Plan, the Planning Inspectorate determined there to be no need for further Green Belt amendments.</li> <li>• Proposed development would mean no natural separating nearby communities, which would lead to urban sprawl.</li> <li>• The Government target the development is based on was estimated prior to Brexit and is not based on factual data regarding the amount of warehousing spaces and homes required in the area.</li> <li>• Concern over the loss of green belt in Bolton for an employment site.</li> </ul>
<p><b>Employment and Economy</b></p> <ul style="list-style-type: none"> <li>• Oppose the loss of grade 3 farmland, which should be protected for future generations.</li> <li>• No need for further employment allocations when there are derelict sites on Wingates Industrial Estate.</li> <li>• Most of the jobs that will be created on this site will be low paid jobs and will not contribute to creating a prosperous economy in Bolton.</li> </ul>
<p><b>Brownfield</b></p> <ul style="list-style-type: none"> <li>• There are enough brownfield sites available to accommodate the amount of employment land required without the loss of green belt.</li> <li>• Need to identify all brownfield sites and reassess criteria for deliverability.</li> </ul>
<p><b>Transport – Highways / Public Transport / Cycling / Walking</b></p> <ul style="list-style-type: none"> <li>• The traffic in and around Westhoughton and M61 junction 5 is gridlocked and traffic backs up onto the motorway. The proposals will only increase traffic along Logistics North and Wingates expansions.</li> <li>• The Chequerbent roundabout already takes some 4000 cars per hour. The congestion at the roundabout will only get worse with increased traffic as a result of the proposed development.</li> <li>• The outlined plans will bring an increase in the number of HGVs using existing roads, which will create more congestion and air pollution.</li> <li>• Cyclists’ ability to travel efficiently and safely amongst the congestion will be impacted by the proposals.</li> </ul>

<b>Environmental – Green Infrastructure, Biodiversity, open space</b>
<ul style="list-style-type: none"> <li>• With a decline in wildlife and habitats, we need to ensure some net biodiversity gain.</li> <li>• The proposals would mean a reduction of green spaces leading to poorer mental health.</li> <li>• Stronger references required regarding Sustainable Drainage Systems (SuDS), the protection and enhancement of the watercourse network and requirement to deliver a net gain as part of the strategic approach to site delivery.</li> <li>• The proposals would cause substantial harm to green belt and encroachment onto the countryside.</li> <li>• There is no mention of the Mill Dam stream, which runs through the site that flows into Main River of Chanters Brook.</li> </ul>
<b>Air Quality</b>
<ul style="list-style-type: none"> <li>• Proposed development would bring about high levels noise and air pollution along the M61 Corridor. This will only worsen due to the increase of HGVs/traffic.</li> <li>• More light pollution will result from development.</li> </ul>
<b>Flood risk</b>
<ul style="list-style-type: none"> <li>• Concerned about the increased flood risk these proposals could bring about.</li> <li>• There is no reference to Sustainable Drainage Systems (SuDS) within this strategic allocation.</li> </ul>
<b>Other</b>
<ul style="list-style-type: none"> <li>• We should not be extracting coal.</li> <li>• The proposals will make the area more built up and claustrophobic and could lead to further development on the other side of the A6, on the remaining green space between Atherton and Westhoughton.</li> </ul>
<b>Response to Comments</b>
<p>The site selection topic papers cover the criteria for site selection which have been informed by the objectives of the GMSF. The selected sites meet site selection criteria 3 to maximise existing economic opportunities.</p> <p>Policy GM-G 10 refers to the need to deliver the positive long-term outcomes of the GM strategy as exceptional circumstances which justify the strategic altering of the GM Green Belt which are set out in the Green Belt Topic Paper.</p> <p>Policy GM-P4 covers the requirement for industrial sites which is evidenced by the strategic employment land availability assessment and the Employment Land Demand Paper.</p> <p>Policy GM-G 9 also states that the best and most versatile agricultural land will be safeguarded.</p> <p>Transport analysis contained in the Locality Assessment has identified necessary mitigation to accommodate any addition traffic generated by the proposed allocation. The Chequerbent North allocation policy states a financial contribution will be provided to mitigate impacts on the Local Road Network including improvements to Chequerbent roundabout or other improvements identified through a transport assessment. The allocation policy also states that development will be required to provide good quality access to the site by motor vehicle, public transport, walking and cycling.</p> <p>Policy GM-G 9 states that across the plan a net enhancement of biodiversity sources will be sought, and will follow the hierarchy of avoiding harm, mitigation and compensation. Policy GM-E 6 requires new development which requires an EIA to be supported by a Health Impact Assessment also.</p> <p>Policy GM-S 5 covers the policies to minimise the impacts on flood risk and sustainable drainage systems.</p> <p>The allocation policy requires high quality landscaping, with trees and hedgerows along eastern boundary retained for screening. The Identification of Opportunities to Enhance</p>

the Beneficial Use of the Green Belt report identifies Mill Dam stream as a key water network biodiversity and wildlife corridor. The document outlines the opportunity for green infrastructure enhancements to improve the status of the water from 'Moderate' to 'Good' through active interventions.

Policy GM-S 6 sets out a range of measures which will be taken to support improvements in air quality. Paragraph 180 of the NPPF covers the requirement of development to limit the impact of light pollution on local amenity and intrinsically dark landscapes.

Policy GM-S 5 requires developments will be located and designed to minimise the impacts of current and future flood risk, and to use sustainable drainage systems. The GM Strategic Flood Risk Assessment (SFRA) covers issues of flood risk and sustainable drainage system.

**GM Allocation 6: West of Wingates** (144 comments)

The main issues raised as objections are traffic concerns, increased flood risk and noise and air pollution, loss of green belt for employment use especially with vacancies on the current Wingates Industrial Estate, the negative effect on rare wildlife and Borsdane Wood Site of Biological Importance, negative effect on neighbouring properties, loss of recreational space and reduction of green space leading to poorer mental health. There are also numerous references to Bolton's Core Strategy and Allocations Plan up until 2026, where the Planning Inspectorate determined there to be no need for further Green Belt amendments. There were recommendations to include stronger references regarding SUDs, the protection and enhancement of the watercourse network, the approach of historic landfill sites within the allocation and the requirement to deliver a net gain as part of the strategic approach to site delivery (as do Natural England). CPRE object due to pressure on Borsdane Wood SBI.

There was submission of an alternative development area of 172ha, compared to GM Allocation 6, which is 184ha, although the alternative site runs along the A6 beyond the Junction 6 roundabout. Other broader alternatives include various ways of protecting the green belt such as identifying brownfield sites to accommodate employment, filling unused industrial units at Logistics North and Wingates, reducing the plan period so there is a supply and spreading the employment allocations more evenly down the A6 to reduce environmental impact. As well as the alternative boundary there was suggestion to amend wording to reflect opportunities for small to medium sized businesses.

<b>Principle / scale of development</b>
<ul style="list-style-type: none"> <li>• Concern that the units will be considered to be bigger than Whistl at Logistics North.</li> <li>• There would be no natural break from other nearby communities creating an urban sprawl.</li> </ul>
<b>Employment and Economy</b>
<ul style="list-style-type: none"> <li>• Warehousing offers very little to the local community in terms of employment, and even the ones that do employ people such as Amazon employ people on minimum wage or below.</li> <li>• B2 and B8 employment can be accommodated on brownfield land and exceptional circumstances are not justified for Green Belt release.</li> <li>• Reduce economic ambition to more realistic levels, which do not require releasing Green Belt land.</li> </ul>
<b>Green Belt</b>
<ul style="list-style-type: none"> <li>• Concern over loss of green belt for employment use, especially with vacancies on the current Wingates Industrial Estates.</li> <li>• Green Belt should remain in its entirety for future generations of people and wildlife.</li> <li>• Development will set a precedent for applications for development on remaining green belt around Wingates, Fourgates and Dicconson Lane.</li> <li>• The proposed additional Green Belt areas of Ditchers Farm and Horwich Golf Club do not justify the loss of Green Belt in Westhoughton.</li> <li>• Farmland should be protected for future generations' food security.</li> </ul>
<b>Brownfield</b>
<ul style="list-style-type: none"> <li>• There are alternative brownfield sites nearby that could be used instead.</li> </ul>
<b>Transport – Highways / Public Transport / Cycling / Walking</b>
<ul style="list-style-type: none"> <li>• Concerns over increased traffic congestion due to increased workforce.</li> <li>• Dicconson Lane is need of desperate repair, mainly driven from the constant movement of large vehicles in and out of Wigan.</li> </ul>

<ul style="list-style-type: none"> <li>• Concern over the addition of new road from Hilton House towards the town centre, which means Wingates will be sandwiched between three roads and will increase congestion.</li> <li>• There are poor transport links with the M6.</li> <li>• Development of the new link road does not solve the problem of crossing the A6 to get to the M61.</li> <li>• Impacts the use of the area for walking and cycling and horse riding.</li> <li>• Concern over the proposal to construct a new bypass that connects to the Bowlands Hey residential development and therefore implies it will be constructed on the Golf Club's property. Development planned on the surrounding areas will affect the Golf Club, especially with this area not being allocated for Green Belt.</li> </ul>
<p><b>Physical Infrastructure and utilities</b></p>
<ul style="list-style-type: none"> <li>• Negative impact on neighbouring properties.</li> <li>• Sewerage pipes in this area are not sufficient to cope with the extra volume, which would come down Dicconson Lane area.</li> </ul>
<p><b>Social Infrastructure</b></p>
<ul style="list-style-type: none"> <li>• Loss of green belt and development will lead to the loss of recreational space.</li> </ul>
<p><b>Environmental – Green Infrastructure, Biodiversity, open space</b></p>
<ul style="list-style-type: none"> <li>• Proposed development would have a negative effect on rare wildlife in the area.</li> <li>• Would cause significant access and disturbance to Borsdane Wood.</li> <li>• It would affect historic hedgerows and many mature trees.</li> <li>• Removal of green spaces will affect mental health of local residents.</li> <li>• Watercourses that flow across the site which drain into the catchment of Borsdane Brook should be protected and enhanced as part of the Green Infrastructure Strategy.</li> </ul>
<p><b>Air Quality</b></p>
<ul style="list-style-type: none"> <li>• Noise, air, and visual pollution have all been raised as concerns.</li> <li>• Physical and mental well-being of local residents will be impacted by traffic related pollution.</li> <li>• Increased poor air quality will affect resident with asthma, particularly children. This will be made worse by traffic queueing on the M61.</li> <li>• Significant scientific evidence to indicate that Nitrogen Oxide emitted by diesel is responsible for as much as one in ten cases of Alzheimer's in people living near busy roads.</li> </ul>
<p><b>Flood risk</b></p>
<ul style="list-style-type: none"> <li>• Increased flood risk as open grassland, which will be developed on- has the benefit of natural drainage.</li> </ul>
<p><b>Heritage</b></p>
<ul style="list-style-type: none"> <li>• Character of the area will be "destroyed", as Westhoughton has had its fair share of development and rapid expansion.</li> <li>• Industrial spread will negatively affect the beauty and views of Rivington.</li> </ul>
<p><b>Other</b></p>
<ul style="list-style-type: none"> <li>• A huge industrial area does not respect the landscape qualities, despite policy to respect the distinctive landscape qualities of M61 Corridor.</li> <li>• Planning Inspectorate for Allocations Plan up to 2026 says there is no need for further amendments to the Green Belt beyond those at Cutacre.</li> <li>• It is logical to expand the Wingates estate in this location, which benefits from good motorway access. However, we need to improve amenities such as medical care to local facilities, specifically school.</li> </ul>
<p><b>Response to comments</b></p> <p>The Stage 2 Greater Manchester Green Belt Study provides an assessment of the impact on the Green Belt and the purposes of including land within it.</p>



Policy GM-P4 covers the requirement for industrial sites which is further evidenced by the strategic employment land availability assessment and the Employment Land Demand Paper.

The site selection topic papers cover the criteria for site selection which have been informed by the objectives of the GMSF. The selected sites meet site selection criteria 3 to maximise existing economic opportunities.

Policy GM-G 10 refers to the need to deliver the positive long-term outcomes of the GM strategy as exceptional circumstances which justify the strategic altering of the GM Green Belt which are set out in the Green Belt Topic Paper. Policy GM-Strat 6 states that the release of Green Belt in 'Northern areas' of GM to boost economic opportunities is required.

The allocation will provide sites for future employment development which address an identified need in Greater Manchester. No evidence that this will set a precedent for employment on unallocated Green Belt sites where different policies apply

Policy GM-G 9 also states that the best and most versatile agricultural land will be safeguarded.

Policy GM-P4 requires the release of some Green Belt in order to meet GM's future development requirements and increase the supply of high quality sites which can compete for investment on a larger scale.

The Greater Manchester Spatial Framework Transport Study sets out the evidence and strategic interventions for GM's transport system in relation to the strategic direction set out in the 2040 Transport Strategy.

The West of Wingates allocation policy states that a good quality access road will be provided, allowing a link from the A6 to Westhoughton. The policy states that development will take advantage of the site's location near Junction 6 of the M61 whilst making sure that it has no significantly adverse effects on the motorway or other surrounding roads. The policy also requires financial contributions to the enhancement of the highway network public transport, cycling and walking or other improvements identified through a transport assessment. The allocation policy also states that the integrity of the extensive network of existing rights of way will be protected. The route of the bypass extending southwards across Bowlands Hey cannot be defined until further feasibility work is completed and then if appropriate a preferred route identified. Therefore, at this stage it cannot be established whether the golf club will be impacted.

Transport analysis contained in the Locality Assessment has identified necessary mitigation to accommodate any addition traffic generated by the proposed allocation.

Policy GM-D 1 covers the plan to work directly with infrastructure providers to ensure that investment plans are consistent with the GMSF proposals.

Policy GM-G2 outlines the requirement to protect, manage and enhance Greater Manchester's Green Infrastructure, including promotion of active travel and recreational opportunities. Additionally, Policy GM-E 7 requires sport and recreation facilities to be protected and enhanced.

Policy GM-G 9 states that across the plan a net enhancement of biodiversity sources will be sought, and will follow the hierarchy of avoiding harm, mitigation and compensation.

The allocation policy covers protection of the Site of Biological Importance at Four Gates from development, combined with very high levels of landscaping and retention of existing woodland, hedgerows and ponds where practicable to minimise visual and environmental impacts.

Policy GM-G 2 states that a strategic approach will be taken to the protection, management and enhancement of Greater Manchester's Green Infrastructure. Policy GM-G 7 states that authorities will deliver the aims and objectives of the GM Tree and Woodland Strategy aiming to protect and enhance woodland.

The Identification of Opportunities to Enhance the Beneficial Use of the Green Belt report identifies Borsdane Brook as a biodiversity and wildlife corridor. The document outlines the opportunity for green infrastructure enhancements to improve the status of the water from 'Moderate' to 'Good' through active interventions.

The allocation policy states that development will be required to take into account the effects of air and noise pollution, and ensure there is no undue adverse impact of light, air and noise pollution for the development's associated operations.

Policy GM-S 6 sets out a range of measures which will be taken to support improvements in air quality, and Policy GM-N 4 requires the mitigation of the impacts of air and noise pollution from road transport.

Policy GM-S 5 requires developments will be located and designed to minimise the impacts of current and future flood risk, and to use sustainable drainage systems. The GM Strategic Flood Risk Assessment (SFRA) covers issues of flood risk and sustainable drainage system.

Policy GM-Strat 6 states that development in this location on land released from the Green Belt will identify opportunities to protect and enhance the natural and historic environments to improve the local character.

The allocation policy covers the requirement for development to incorporate high levels of landscaping and retention of existing features to minimise the visual impacts on the wider landscape.

**Further comments on the overall proposals for Bolton, including strategic transport interventions (125 comments)**

<p><b>Principle / scale of development</b></p> <ul style="list-style-type: none"> <li>• Too much development in Westhoughton. Bolton council has no interest in the residents of Westhoughton. They are just concerned with getting more business rates from large companies, regardless of the impact for local residents.</li> <li>• GMSF doesn't increase the supply of deliverable land and therefore additional land needs to be made available.</li> <li>• The overall strategy focuses on boosting significantly the competitiveness of the northern parts of Greater Manchester, yet the strategy should also focus on delivering developments in the northern areas which are attractive to the market, of high quality and are aspirational.</li> <li>• Strategic policies for economic development and housing are not aligned, with the housing requirement adopting a minimum assessed need and not meeting the needs to deliver its ambition to become a top global city.</li> <li>• Although the GMSF seeks to boost the competitiveness of the north, the housing requirements don't reflect the aspiration. Bolton's housing requirement falls below the minimum housing requirement established using the standard calculating method and is instead relying on apartment-focused developments in Manchester and Salford.</li> <li>• GM needs a land-use plan that enables development and acts as a guidance for future local plans – the current draft of the GMSF does not do this.</li> </ul>
<p><b>Housing (inc affordable housing)</b></p> <ul style="list-style-type: none"> <li>• In favour of the removal of Hulton Park site for housing.</li> <li>• Housing in town centres encourages the use of public transport and cycling and reduces reliance on cars.</li> <li>• Concern over the impact of immigration trends on housing demands and the inflating house prices.</li> <li>• The affordable housing proposed cannot be achieved if the affordable housing figure remains at 201,000. Financial contributions should be made towards affordable housing in lieu of on-site provision to provide the mix of housing for local needs.</li> <li>• There is an over reliance on apartment in the housing supply.</li> <li>• Concern that high-density standards through the set criteria are too high and are not achievable.</li> <li>• Future development needs cannot be reasonably found without a review and release of Green Belt at this stage – an approach consistent with National Planning Policy Framework.</li> </ul>
<p><b>Employment and Economy</b></p> <ul style="list-style-type: none"> <li>• Westhoughton has more than enough industrial land</li> <li>• The employment sites in Bolton are all proposed along the west of the M61, which leaves a great proportion Bolton lacking a strategic focus and opportunities for growth.</li> </ul>
<p><b>Green Belt</b></p> <ul style="list-style-type: none"> <li>• Too much green belt is being lost in Bolton- green belt must not be built on.</li> <li>• Misleading of Bolton Council to state it protects green belt from housing in regional plan, when it is proposing building one of Europe's largest industrial sites on green belt land. Building industrial developments on green belt is worse than housing.</li> <li>• Pleased that Green Belt is no longer allocated for residential development. However, concerns that forecasts for economic growth is over-optimistic and the demand will not be as great as what is allocated. Green Belt release should be on a phased approach and only after Brownfield sites have been used first. Concerned impact on local transport and infrastructure should be completely adequate to accommodate increased traffic.</li> </ul>

- In favour of the proposal to create a new green belt addition at Horwich Golf Club identified as LU02 which meets the standards of the National Planning Policy Framework and supported by the LUC report.
- Support for the admission on Knowles Farm as Green Belt admission. The land adjoins green belt and makes a natural fit.
- Objection to use of Green Belt land. Green Belt allocations can be deleted by:
  - Making a strong case for using lower housing target figures
  - Reducing economic ambitions to realistic levels
  - Utilising more brownfield sites and reassessing criteria for deliverability
  - Aiming for a shorter plan period.
- Greater Manchester Green Belt plan no longer serves the Green Belt purposed set out in the National Planning Policy Framework. GMSF must therefore take the opportunity to address those issues or make it explicit that plans should be allowed to be changes in non-strategic plans such as local plans and neighbourhood plans.
- The tight Green Belt around North Bolton prevents development in a very sustainable location of C2 and C3 housing. There is strong demand for C2 accommodation in a location convenient to shops and services, but no sites are available because of a restrictive green belt.
- There is a need to release Green Belt land for housing development, in order to meet future housing needs.

#### **Brownfield**

- Bolton is one of the most industrial areas of Manchester in the past, there has to be alternatives, or is it a fact that it costs too much to use brownfield sites?
- There is enough brownfield site available in Bolton to accommodate the same amount of land without releasing green belt.
- Concern that brownfield land is the only focus to deliver a five-year supply. Strategy should be amended to 'support and encourage' brownfield re-use as opposed to making it a priority.
- In favour of the focus on urban brownfield sites for housing

#### **Transport – Highways / Public Transport / Cycling / Walking**

- More information required regarding the road linking Westhoughton to A6. Who will fund the up keep of current roads with increased traffic, will council tax be raised? Will HGV traffic be restricted from using this route?
- M61 and M60 are already congested, policies need to consider this.
- Support for the electrification of the Bolton to Manchester line, making Bolton TC more accessible. Suggest this should happen to the Bolton-Wigan line, but recommendation that the timescale is shortened to deliver the benefits ASAP.
- Bolton has the 3rd largest population in GM, so the Metrolink should be extended to Bolton.
- Metrolink proposals aren't enough to provide capacity and efficiency to bring Bolton and Wigan in line with other areas of Manchester. Metrolink plans need to be fast-tracked, specifically on the Atherton Lane, which would serve Daisy Hill station. Need to increase frequency of services from Westhoughton into Manchester. Metrolink should link to Bolton Town Centre.
- Better access into and out of the town centre is required from most districts in Bolton. Not more relief roads or bypasses but improved cycle paths, car share initiatives and encouraging people to walk or cycle on shorter journeys and use public transport for longer journeys.
- Wigan Council are preparing a further 700 houses at Gibfield which is on the boundary of Westhoughton. In addition to the proposed warehousing sites in Bolton, this will further impact the traffic problems in the area, specifically Chequerbent Roundabout.

<ul style="list-style-type: none"> <li>• Support – The Bolton area is markedly less developed than other more congested and polluted areas of Greater Manchester and can absorb the associated higher levels of transport density.</li> </ul>
<p><b>Physical Infrastructure and utilities</b></p>
<ul style="list-style-type: none"> <li>• Infrastructure cannot deal with development, traffic would be hazardous.</li> <li>• Infrastructure and investment don't come with development.</li> </ul>
<p><b>Environmental – Green Infrastructure, Biodiversity, open space</b></p>
<ul style="list-style-type: none"> <li>• Not government body has checked the translocation of species.</li> <li>• Strongly object to GMSF supporting golf course. This would remove 23 acres of mature trees and 3km of hedgerow, devastating wildlife habitat.</li> <li>• It's been revealed that Bolton is a hotspot for breeding swifts. Swift populations the UK declined by 51% between 1995 and 2015. Therefore, new homes for swifts with internal nesting bricks need to be provided.</li> <li>• Map doesn't clear show the priority green infrastructure areas. There is limited justification as to why these areas have been selected and the policy does not account for how development can improve green infrastructure.</li> </ul>
<p><b>Air Quality</b></p>
<ul style="list-style-type: none"> <li>• The development envisaged in this area over-emphasised the destructive freight and logistics industries which will imperil the GMCA's strategies on Clean Air and Carbon Emissions.</li> <li>• Council should take responsibility for the impact of pollution.</li> <li>• Should not require more stringent carbon emission reduction targets than those required by Building Regulations. Any GMSF policy must not place burdensome requirements that impact viability and deliverability.</li> </ul>
<p><b>Other</b></p>
<ul style="list-style-type: none"> <li>• Should not be extracting coal</li> <li>• Development should be aspirational – much of Westhoughton's modern housing is of poor quality through poor street and housing design. Open Space and local facilities should be incorporated into design.</li> </ul>
<p><b>Response to comments</b></p> <p>The site selection topic papers cover the criteria for the location of development sites which have been informed by the objectives of the GMSF, with selection criteria 3 to maximise existing economic opportunities. The Locality Assessment also provides justification for site selections in terms of the transport system.</p> <p>Policy GM-Strat 6 sets out the measures to provide a good supply of high quality development sites and major transport improvements to support greater competitiveness in northern parts of Greater Manchester.</p> <p>Methodology for calculating Local Housing Need is set by the government and deviation from this can only be justified in exceptional circumstances, and the justification for the housing figures is covered in the Housing Topic Paper. There is no equivalent methodology in terms of economic growth and this approach is based on the economic forecasting work set out in the Employment Land Demand Paper.</p> <p>The GMSF provides the strategic plan for the city-region and once adopted will form part of each Greater Manchester authority's development plan. Districts will continue producing Local Development plans with more detail reflecting local circumstances. The evidence that underpins the GMSF will also inform district level plans.</p> <p>The Greater Manchester Strategic Housing Market Assessment provides an assessment of the need for housing in Greater Manchester and sets out evidence to inform overall</p>

housing requirements for the conurbation and individual local authorities. This covers market and affordable housing.

Policy GM-H 2 states the provision of affordable housing will be supported either on-or off-site as part of developments, with locally appropriate requirements being set by each local authority.

Policy GM-H 4 states the requirement for increasing the average density of housing developments will contribute to a number of GMSF objectives. Housing densities will be based on the site location and in some cases site specific or housing market issues.

The site selection topic papers cover the criteria for site selection which have been informed by the objectives of the GMSF. The selected sites meet site selection criteria 3 to maximise existing economic opportunities.

Policy GM-G 10 sets out the exceptional circumstances which justify the strategic altering of the GM Green Belt. The justification for this is set out in the Green Belt Topic Paper.

The Housing Topic Paper provides the justification for Bolton's housing requirement which is based on national guidelines for calculating housing need.

Policy GM-P4 covers the requirement for additional industrial and warehousing sites as the existing supply is insufficient to meet the overall identified need, which is evidenced by the districts' strategic employment land availability assessment and the Employment Land Demand Paper.

Policy GM-Strat 14 outlines the requirement for a sustainable and integrated transport network in Greater Manchester and an ambitious programme of investment in the transport system. The Greater Manchester Spatial Framework Transport Study sets out the evidence and strategic interventions for GM's transport system as a whole and in relation to the strategic direction set out in the 2040 Transport Strategy.

The Locality Assessments identify necessary mitigation to accommodate additional traffic generated by the proposed allocations. The site specific allocation policies also provide details of interventions in the transport system.

Policies GM-N4 and GM-N5 cover the requirement for development to support high levels of walking, cycling and public transport.

Policy GM-D 1 covers the plan to work directly with infrastructure providers to ensure that investment plans are consistent with the GMSF.

Policy GM-G 9 sets out the net enhancement of biodiversity resources being sought across the plan as a whole, and includes measures to achieve this.

Planning permission for the golf course at Hulton Park was granted by the Secretary of State in July 2020, its implementation being dependent on a successful Ryder Cup bid for 2030 or 2034. In reaching this decision the Secretary of State considered all relevant factors such as very special circumstances and the effects on the existing woodland and listed park.

Policy GM-G 2 sets out the strategic approach to the protection, management and enhancement of GM's Green Infrastructure, and identifying key opportunity areas for its improvement. The report on the Identification of Opportunities to Enhance the Beneficial

Use of the Green Belt also gives place specific opportunities to enhance Green Infrastructure.

Policy GM-S 2 states the aim of delivering a carbon neutral Greater Manchester no later than 2038.

Policy GM-S6 sets out a range of measures which will be taken to support improvements in air quality. Policy GM-N4 also requires the mitigation of the impacts of air and noise pollution and carbon emissions from road transport.

Policy GM-H 3 states that innovation in housing will be supported where it is consistent with principles of good design and local distinctiveness. More policy will be determined through district local plans, masterplans and other guidance to reflect local circumstances

### 3.2.3. Strategic Allocations in Bury

There are 3 allocations in Bury and these received 1,909 comments in total

#### **GM Allocation 7: Elton Reservoir Area** (690 comments)

The main issues raised as objections are transport concerns; specifically as the proposed link road exits onto existing roads which are already at capacity and the Metrolink is also overloaded, disproportionate loss of Green Belt which would merge Bury and Radcliffe, concern at distances between existing and proposed properties, loss of major recreational asset for area and impact on health and wellbeing, loss of important ecological resource, concern over flood risk and sewerage capacity, loss of greenspace and key ecological assets, impact on industrial heritage and loss of working farms. There was also a particular concern regarding the impact on social infrastructure and the need to replace lost facilities in Radcliffe.

It is noted that there is potential for the allocation to give rise to traffic impacts on the Strategic Route Network at Junction 17 M60. It is highlighted that a Level 1 and 2 Strategic Flood Risk Assessment is required and note that residual risk must be considered appropriately. It is felt that biodiversity gains would not mitigate the loss of key species. Alternative strategies suggested include increased densities to reduce Green Belt loss and brownfield sites in town centres being used first. It was pointed out that villages surrounding Radcliffe are dying and would benefit from strategic infill and connection to new infrastructure such as a circular bus service could connect both existing and future residents to Metrolink stops.

<b>Principle / Scale of development</b>
<ul style="list-style-type: none"> <li>• Object to the scale of development in this area. Growth should be evenly distributed across the Borough and throughout the six towns.</li> <li>• Object to losing one of the last remaining accessible greenspaces in a lower socio-economic area.</li> <li>• There is poor land stability and mineshafts on-site.</li> <li>• Question the relationship between the Council and developers.</li> <li>• Development should be focused on the southern area close to Derby High School and the new Coney Green High School.</li> <li>• Villages surrounding Radcliffe are dying and would benefit from infill development and connection to new infrastructure.</li> <li>• This is a site of strategic significance that will make a considerable contribution to housing supply, is accessible to surrounding towns and well connected to existing infrastructure.</li> </ul>
<b>Housing</b>
<ul style="list-style-type: none"> <li>• There is too much proposed housing density</li> <li>• Proposed housing will not meet the needs of over 65s.</li> <li>• Proposed housing will not be affordable.</li> <li>• Concerned about the distances between existing and proposed properties.</li> <li>• There is not enough proposed housing density, which will result in a need to develop on Greenfield land.</li> <li>• It is a deliverable site with no constraints that cannot be addressed through careful master planning.</li> </ul>
<b>Green Belt</b>
<ul style="list-style-type: none"> <li>• Disproportionate loss of Green Belt, which would merge Bury and Radcliffe. Has key functions in halting urban sprawl, sheltering wildlife, growing food and providing tranquillity.</li> </ul>



<ul style="list-style-type: none"> <li>• Retained Green Belt insufficient. Unsure why it includes reservoirs and a crematorium. Additions can never compensate.</li> <li>• Exceptional circumstances exist in which Green Belt loss can be acceptable and efforts to minimise this are welcomed.</li> </ul>
<p><b>Brownfield</b></p>
<ul style="list-style-type: none"> <li>• There are many brownfield sites in Radcliffe which if used would aid regeneration and improve footfall.</li> </ul>
<p><b>Transport</b></p>
<ul style="list-style-type: none"> <li>• There would be an impact on local roads and the wider network, particularly in Radcliffe, where the proposed link road exits onto these roads.</li> <li>• There would be an impact on Bury Bridge/Bury New Road (some of worst congested nationally) and on motorway network.</li> <li>• Public transport is unreliable. Buses will not be used and need to be integrated. The Metrolink is overcapacity.</li> <li>• Walking/cycling plans will not work due to topography.</li> <li>• Need more parking, circular bus service to connect residents to Metrolink stops and a separate entrance to the cemetery.</li> <li>• Support – Detailed proposals on infrastructure welcomed</li> </ul>
<p><b>Physical Infrastructure and utilities</b></p>
<ul style="list-style-type: none"> <li>• Utilities network would not cope with the increased demand.</li> <li>• Sewerage system is at capacity and will need new and expanded facilities.</li> <li>• The existing transport network cannot cope.</li> <li>• More freight should be moved by rail.</li> <li>• More detail required on quality bus transit.</li> <li>• Metrolink links to Bolton and Rochdale should be considered.</li> <li>• Support – Detailed proposals on infrastructure welcomed</li> </ul>
<p><b>Social Infrastructure</b></p>
<ul style="list-style-type: none"> <li>• Large number of community facilities have been lost in recent years and still need replacing i.e. swimming pools, secondary schools, and civic suite.</li> <li>• Health provision is currently inadequate.</li> <li>• All of the schools in area are over-subscribed.</li> <li>• The Leisure Centre is popular and should not be lost.</li> <li>• Infrastructure should be built prior to houses being occupied.</li> <li>• There is a lack of detail on new health facilities.</li> <li>• Support – Detailed proposals on infrastructure welcomed</li> </ul>
<p><b>Environmental</b></p>
<ul style="list-style-type: none"> <li>• Loss of a prized asset within easy reach of population, which is heavily used by a wide range of people. Opening this natural area up as a country park will sterilise it and harm views in the area.</li> <li>• This is not just a question of upgrading. New recreational land is needed.</li> <li>• Would lead to the loss of the most biodiverse area in the Borough. Opportunities exist for net gain. Biodiversity gains are unrealistic and will not mitigate for loss. New woodland is needed. The policy should mention maintain and enhance priority habitats.</li> <li>• Remediation required for historic landfill sites.</li> <li>• Management of park should be transferred to an organisation.</li> <li>• Objection to the loss of pitches at Warth Fold. They were well used.</li> <li>• Noise and light pollution would harm the cemetery.</li> <li>• Improve the canal for leisure e.g. water taxi, improved walking/cycling routes and off road routes for horse riders.</li> <li>• Homes should support species e.g. bat and swift boxes.</li> </ul>

<ul style="list-style-type: none"> <li>• Evidence required e.g. biodiversity surveys, bat survey and open space management.</li> <li>• Parkland will provide substantial opportunities to protect habitats and make it accessible by a range of users.</li> <li>• Carbon reduction goals will not be achieved. New homes should be carbon-neutral.</li> <li>• We should invest in Green Technology.</li> </ul>
<p><b>Air Quality</b></p>
<ul style="list-style-type: none"> <li>• Bury Bridge and A56/A58 are some of worst areas in the country for air quality.</li> </ul>
<p><b>Flood risk</b></p>
<ul style="list-style-type: none"> <li>• Existing residents were adversely affected in the 2015 floods including Bury and Bolton Road due to the area being in a natural flood plain.</li> <li>• Concerned at the potential for the reservoir to fail and the subsequent danger for new and existing residents. Properties will be uninsurable.</li> <li>• Mimicking of natural drainage is unrealistic and ignores the size of the development.</li> <li>• Evidence required on Level 1&amp;2 Strategic Flood Risk Assessment. Residual risk must be considered appropriately.</li> </ul>
<p><b>Heritage</b></p>
<ul style="list-style-type: none"> <li>• Presence of Bronze Age burial site and embankment of a horse-pulled railway.</li> <li>• Canal is a major heritage asset in the area and must be fully considered.</li> </ul>
<p><b>Other</b></p>
<ul style="list-style-type: none"> <li>• There was a lack of consultation from Bury Council</li> <li>• We should be using the latest housing projections to calculate housing need.</li> <li>• Loss of working farms and jobs is contrary to economic objectives and will lead to the displacement of animals. Farms are crucial to responding to climate change and Brexit issues.</li> <li>• The construction process will lead to an increase in crime and anti-social behaviour.</li> <li>• The site selection process has been developer-led.</li> </ul>
<p><b>Response to Comments</b></p> <p><u>Principle / Scale of development</u>  The Elton Reservoir allocation seeks to deliver 3,500 houses in Bury and Radcliffe, delivering a broad mix of homes designed to diversify the type of accommodation available in Bury and Radcliffe, and include provision of affordable housing to address local housing need. Fundamental to the delivery of the allocation will be the provision of major highway infrastructure, a new Metrolink stop with associated park and ride facilities, provision of new facilities for primary and secondary education and small local centres.</p> <p>The allocation is largely surrounded by development within the existing urban area and is in a sustainable location. The scale of the proposed allocation presents an opportunity to deliver the necessary infrastructure required to support the proposed development including new and improved highways infrastructure and opportunities for cycling and walking routes. The allocation will also increase the provision of publicly accessible multifunctional green and blue infrastructure to provide health benefits to residents and create a visually attractive environment.</p> <p><u>Housing</u>  Policy GM-H4 covers density of new housing and seeks to maximise average density of new housing in accessible locations. The provision of a range of housing tenures and types is addressed by GMSF thematic policies specifically GM-H2 Affordability of New Housing and GM-H3 Type, Size and Design of New Housing. The allocation policy requires the delivery of a broad mix of houses which includes an appropriate mix of house types and sizes and accommodation for older people. The allocation policy requires the</p>

provision of affordable housing equivalent to at least 25% of the dwellings on the site across a range of housing types and sizes.

#### Green Belt

The policies contained within the GMSF should be read as a whole, in relation to Green Belt Policy GM-10 covers the Greater Manchester Green Belt, the policy should be read in conjunction with the Green Belt Assessment and the Green Belt Exceptional Circumstances justification paper which sets out the case for exceptional circumstances for the Green Belt proposals as a whole and the specific case for this allocation.

The allocation policy makes provision for a significant green corridor which will remain within the Green Belt and will provide a strategic amount of new, high quality and publicly accessible open space/parkland coupled with a network of multi-functional green and blue infrastructure within the allocation.

#### Brownfield

Policy GM-H1 covers the scale, distribution and phasing of new housing development and demonstrates that brownfield land will be the predominant source of land over the plan period. A large number of previously developed sites suitable for housing are identified in the council's Brownfield Land Register and its Strategic Housing Land Availability Assessment (SHLAA) however these sites are insufficient to meet Bury's identified need and as such there is a need to identify additional sites. The GMSF proposes a 'brownfield preference' policy to help bring brownfield sites forward as early as possible in the plan period. The former Coney Green school site which is a previously developed site is located within the allocation boundary.

#### Transport

Transport analysis contained in the Locality Assessment has identified necessary mitigation to accommodate any additional traffic generated by the proposed allocation. The allocation policy sets out specific requirements for new and improved highways infrastructure including a north-south strategic spine road connecting Bury and Bolton Road (A58) Bury Road, Radcliffe, a strategic connection from the spine road to Spring Lane, Radcliffe via the Coney Green High School site and other off site highway works where these are considered necessary.

The allocation policy sets out requirements for major investment in public transport infrastructure to enable more sustainable transport choices including a new Metrolink stop and associated park and ride facilities in the Warth area.

#### Physical Infrastructure and utilities

The allocation policy sets out a specific requirement for a masterplan to be approved before any planning applications are submitted. The masterplan will include a clear phasing strategy as part of an integrated approach to the delivery of infrastructure to support the scale of the development as a whole. The policy should also be read in conjunction with the Utility Statement for Elton Reservoir. Capacity and efficient use of utilities and infrastructure is addressed by GMSF thematic policy GM-D1 Infrastructure Implementation.

#### Social Infrastructure

The allocation policy makes provision for two new two-form entry primary schools and a new secondary school to meet the needs of the prospective school aged residents. The policy also includes requirements for new local centres in accessible locations which include a range of appropriate retail, health and community facilities and ensure that they are integrated with existing communities.

#### Environmental

The policy sets out a requirement to minimise impacts on and provide net gains for biodiversity assets within the allocation in accordance with Policy GM-G10 – A Net Enhancement of Biodiversity and Geodiversity. The allocation policy includes the provision of a significant green corridor which will remain within the Green Belt and will provide a strategic amount of new, high quality and publically accessible open space/parkland coupled with a network of multi-functional green and blue infrastructure within the allocation. The allocation policy should be read in conjunction with policy GM-G2 Green Infrastructure Network and policy GM-G9 Standards for a Greener Greater Manchester and supporting Ecology reports.

#### Air Quality

The policies contained within the GMSF should be read as a whole, in relation to Air Quality this is covered by policy GM-S6 – Clean Air, the GMSF policy should be read in conjunction with the Elton Air Quality Statement.

#### Flood Risk

Policy GM-S5 covers flood risk and the water environment and makes specific reference to sustainable drainage systems (SuDS) this should also be read in conjunction with the accompanying Strategic Flood Risk Assessment (SRFA) and the Elton Flood Risk Assessment and Reservoir Assessment. The policy makes specific reference to mitigating flood risk from the River Irwell, Elton Reservoir and the Withins Reservoir. The policy justification also sets out a requirement for an appropriate drainage strategy which includes multifunctional SuDS in order to minimise and control the rate of surface water runoff.

#### Heritage

The policy sets out requirements to protect and enhance heritage and archaeological assets and their setting within the allocation in accordance with the findings and recommendations of a Heritage Impact Assessment, including the Grade II Listed Old Hall Farmhouse and the wider historic character of the surrounding area, the policy should be read alongside the Elton Heritage Statement. Heritage is addressed by GMSF thematic policy GM-E2 along with the accompanying GMSF Heritage Environment Background Paper.

**GM Allocation 8: Seedfield (268 comments)**

There has been mixed response to this allocation with some support due to the allocation representing an accessible brownfield site on the edge of the urban area. The main issues raised as objections are transport concerns; specifically as there is only one access into the site and this exits onto an existing congested route in a largely built up area, impact on ecology and impact on social infrastructure. There is concern at the loss of playing pitches and a lack of suitable replacement sites, whilst there is support for the proposed off-road access from the site into Burrs Country Park. There was a request that the route to Burrs is also made accessible for horse riders and also a requirement for sustainable transport modes to include green infrastructure.

Suggested alternative strategies included converting mills to residential use, a requirement for a new sports hall and that the former secondary school at Seedfield should be reinstated.

<b>Principle / scale of development</b>
<ul style="list-style-type: none"> <li>• The local area is already largely built-up.</li> <li>• Streets would be preferred to cul-de-sacs.</li> <li>• The site needs redevelopment and represents an obvious infill opportunity on the edge of the urban area.</li> </ul>
<b>Housing (inc affordable housing)</b>
<ul style="list-style-type: none"> <li>• Concern that proposed homes will not be affordable.</li> </ul>
<b>Green Belt</b>
<ul style="list-style-type: none"> <li>• This allocation is already part of a built-up area and should not be Green Belt.</li> </ul>
<b>Brownfield</b>
<ul style="list-style-type: none"> <li>• Practical use of a brownfield site and an obvious infill opportunity that needs redevelopment.</li> <li>• The plan should include more sites like this on brownfield land.</li> </ul>
<b>Transport – Highways / Public Transport / Cycling / Walking</b>
<ul style="list-style-type: none"> <li>• The only access point into the site is inadequate. It is narrow and used for parking, has poor access for emergency services and additional access points are required.</li> <li>• Additional development would lead to likely congestion on the A56.</li> <li>• Public transport improvements are required e.g. rail/Metrolink.</li> <li>• There is a lack of detailed information on transport interventions.</li> <li>• Site represents an accessible brownfield site close to bus route and town centre.</li> </ul>
<b>Physical Infrastructure and utilities</b>
<ul style="list-style-type: none"> <li>• Lack of detailed information on infrastructure requirements and provision.</li> </ul>
<b>Social Infrastructure</b>
<ul style="list-style-type: none"> <li>• Existing schools in northeast Bury over-subscribed. The former secondary school at Seedfield should be brought back into use.</li> <li>• GPs and dentists are in short supply.</li> <li>• A new sports hall is required as part of the proposals.</li> <li>• Lack of detailed information on social infrastructure requirements and what the community benefits will be.</li> </ul>
<b>Environmental</b>
<ul style="list-style-type: none"> <li>• These proposals would lead to a loss of wildlife. We need to make the most of natural resources.</li> <li>• There would be a loss of recreation space, in particular playing pitches. These are in demand and there is a lack of suitable replacement sites in the area.</li> </ul>

- Open space should be maintained by developers.
- A buffer is required to the west of the site.
- There is a lack of detailed information on proposals such as evidence on existing GM ecological networks or an Ecological Impact Assessment.
- Welcome the proposed off-road access from the site to Burrs Country Park, walking/cycle routes should include Green Infrastructure and needs to be made accessible for horse riders.

#### **Air Quality**

- Concern that congestion will negatively impact air quality.

#### **Other**

- Little done to publicise proposals, online portal was difficult to use and questions were leading in nature.
- Lack of detail on approach taken/reasoning e.g. not clear why previous sites rejected, why some districts have not released Green Belt and others have.
- Imbalance between Green Belt loss in north and south.

#### **Response to Comments**

##### Principle / scale of development

Development within this allocation will be required to deliver a broad mix of around 140 houses to diversify the type of accommodation in the Seedfield area, and include the provision of affordable housing in order to address local housing need.

The site is already well connected to the existing urban area and is in a sustainable location. The site is largely brownfield containing a number of existing buildings and large areas of car parking meaning that it could come forward for development outside of the GMSF process.

##### Housing (inc affordable housing)

The provision of a range of housing tenures and types is addressed by GMSF thematic policies specifically GM-H2 Affordability of New Housing and GM-H3 Type, Size and Design of New Housing. The allocation policy requires the provision of affordable housing equivalent to at least 25% of the dwellings on the site across a range of housing types and sizes.

##### Transport – Highways / Public Transport / Cycling / Walking

The allocation policy sets out specific requirements for new and improved local highway infrastructure to facilitate appropriate access to the allocation and incorporate enhancements to public transport, pedestrian and cycle routes in the area. The policy includes a requirement to ensure the design and layout allows for effective integration with surrounding communities, including active travel links to Burrs Country Park and employment opportunities in Bury Town Centre.

##### Physical Infrastructure and utilities

The allocation policy requires the provision of necessary infrastructure such as utilities, broadband and electric vehicle charging points. Capacity and efficient use of utilities and infrastructure is addressed by GMSF thematic policy GM-D1 Infrastructure Implementation.

##### Social Infrastructure

The allocation policy requires the retention and enhancement and/or the replacement of the existing recreation facilities and make provision for new recreation facilities to meet the

needs of the prospective residents. The policies contained within the GMSF should be read as a whole, in relation to health and education provision this is covered by policies GM-E-5 Education, Skills and Knowledge and GM-E6 Health.

Environmental

The allocation policy requires the retention and enhancement of the wildlife corridor and green infrastructure elements to the west and the of the allocation and the introduction of appropriate mitigation measures to provide health benefits to residents as well as creating a visually attractive environment in accordance with policy GM-G2 Green Infrastructure Network and policy GM-G9 Standards for a Greener Greater Manchester.

Air Quality

The policies contained within the GMSF should be read as a whole, in relation to Air Quality this is covered by policy GM-S6 – Clean Air.

**GM Allocation 9: Walshaw** (640 comments)

The main issues raised as objections are traffic and air quality concerns both from Walshaw and the cumulative impact of Elton Reservoir. More specifically as existing roads are at capacity partly due to large amount of schools and are in poor condition the proposed solutions do not alleviate the situation. Loss of Green Belt which will merge towns and cause urban sprawl is also a major concern as well as the impact on key ecological assets the lack of net gain, loss of well-used recreation space and impact on health and wellbeing. There was also concern over the inadequate sewerage system and potential for flooding, increased stress on social infrastructure with some stating that new school provision is inadequate and the allocation would impact on heritage.

It is noted that the site’s potential to provide net gains for local communities and these can be found in green infrastructure, deciduous woodland, priority ponds and protected species. There is recognition that the grade of farmland is low but is within Green Belt and should be kept open with the site offering local benefits such as residential amenity and improved health and well-being. Alternative strategies include higher density and terraced housing which would minimise the loss of greenspace and be more in keeping with the local area

<b>Principle / scale of development</b>
<ul style="list-style-type: none"> <li>• It would be an unfair concentration of large-scale development in one area with no clear rationale for its inclusion.</li> <li>• The setting of Walshaw village would be harmed. Separation required between existing and proposed properties.</li> <li>• Walshaw is home to a number of businesses, which would be affected. Should be selecting sites that are vacant/have fewer constraints.</li> <li>• Loss of farmland that should be kept open as it offers local benefits e.g. residential amenity and improved health/wellbeing.</li> <li>• The area is unsuitable for housing. Poor land stability due to past mining activity, culverted watercourses and natural springs are on-site. Evidence required addressing land stability/hydrology.</li> <li>• Parts of the site within the indicative housing areas are not available for development. The site should be extended to include The Nurseries/Scholes Nursery.</li> <li>• Landowners report that it is available, suitable and achievable. A joint framework is being prepared for the whole site.</li> </ul>
<b>Housing (inc affordable housing)</b>
<ul style="list-style-type: none"> <li>• The affordable housing situation will not be addressed.</li> <li>• More information needed on affordability and house type. They need to cater for over 65s and first time buyers not aspirational homes.</li> <li>• Should be built out by smaller, locally based developers.</li> <li>• Higher density terraced housing would minimise greenfield loss and would be in keeping with local area.</li> <li>• Housing figure should be expressed as a minimum.</li> </ul>
<b>Employment and Economy</b>
<ul style="list-style-type: none"> <li>• Construction jobs would only be temporary.</li> <li>• The proposals will damage the local economy. Local businesses will not benefit.</li> <li>• Employment sites continue to be underused and central Manchester sites will still outperform them.</li> </ul>
<b>Green Belt</b>
<ul style="list-style-type: none"> <li>• Large amount of loss, which will merge Bury/Tottington and cause urban sprawl.</li> <li>• Has role in enabling recreation, leisure, good health and wellbeing.</li> <li>• Efforts to minimise loss are welcomed.</li> </ul>



<p><b>Brownfield</b></p> <ul style="list-style-type: none"> <li>• The Nurseries/Scholes Nursery site is brownfield and should be included.</li> <li>• Several unused/derelict brownfield sites and those in town centres should be prioritised and regenerated.</li> </ul>
<p><b>Transport – Highways / Public Transport / Cycling / Walking</b></p> <ul style="list-style-type: none"> <li>• Existing roads are at capacity and are in poor condition partly due to large amount of schools in area. There would be an impact on road safety, emergency services and businesses. Consider the impact on the network including routes going out of the Borough.</li> <li>• There is pressure on Bury Bridge. We need another road crossing over the Irwell.</li> <li>• Proposed highway solution does not alleviate the situation. Not clear how Elton Reservoir link road helps, only displaces traffic.</li> <li>• Concerns at collective impact on existing road network and on motorways from both Walshaw and Elton Reservoir allocations.</li> <li>• Public transport is poor and new bus routes will not work.</li> <li>• Current walking routes not safe, cycling plans will not work.</li> <li>• The detailed proposals on infrastructure are welcomed.</li> </ul>
<p><b>Physical Infrastructure and utilities</b></p> <ul style="list-style-type: none"> <li>• There is an inadequate sewerage system in Scobell Street area, which overflows in heavy rain. No policy reference to improving its capacity. United Utilities has not addressed this issue.</li> <li>• The proposals will impact recycling and waste.</li> <li>• Water shortages in the area and development will make it worse.</li> <li>• Support for infrastructure provision commitments. Current infrastructure is inadequate and new provision must be in place first.</li> <li>• Uncertainties over infrastructure require other sites to be considered that do not have constraints.</li> <li>• The detailed proposals on infrastructure welcomed.</li> </ul>
<p><b>Social Infrastructure</b></p> <ul style="list-style-type: none"> <li>• Increased stress on schools, which are already inadequate, and at capacity.</li> <li>• Concern that hotel and leisure facilities at Bolholt will be lost.</li> <li>• More clarity needed on new social infrastructure. Concern that Fairfield Hospital is reducing services.</li> <li>• Local centre will not work and will become vacant. Shops/community facilities should be within walking distance and be co-located. Should invest in redevelopment of Radcliffe town centre instead.</li> <li>• Detailed proposals on infrastructure welcomed. Provision of new school welcomed.</li> </ul>
<p><b>Environmental – Green Infrastructure, Biodiversity, open space</b></p> <ul style="list-style-type: none"> <li>• Important element of the GM green infrastructure network.</li> <li>• Proposals would cause harm to the Special Landscape Area between the lodges.</li> <li>• Negative impact on key ecological sites, considerable loss of wildlife home to a wide range of species, will reduce their movement. Deciduous woodland and priority ponds are on-site.</li> <li>• Designations of Sites of Biological Importance/corridors need to be reviewed and extended.</li> <li>• The proposals would lead to a loss of trees, woodland and hedgerows. There would be no net biodiversity gain.</li> <li>• The policy should protect and enhance the Nurseries site and require a buffer.</li> <li>• Loss of well-used recreation space and public rights of way would negatively impact on health and wellbeing. Routes need to be made safe for horse riders and others.</li> <li>• Green infrastructure corridors should link further west and east to other Borough-wide routes e.g. Kirklees Trail.</li> </ul>

<ul style="list-style-type: none"> <li>Proposals should provide a buffer for water bodies at Bolholt.</li> <li>We need strict guidelines to ensure carbon neutrality benefits.</li> <li>Further evidence required such as an Ecology Impact Assessment and maintenance of green infrastructure corridors.</li> <li>Opportunities exist to secure net gains for nature e.g. green infrastructure, woodland, ponds and protected species.</li> </ul>
<p><b>Air Quality</b></p> <ul style="list-style-type: none"> <li>Huge impact on carbon footprint/pollution likely to increase which would have a negative impact on quality of life.</li> </ul>
<p><b>Flood risk</b></p> <ul style="list-style-type: none"> <li>Concern over increase in flooding, surface water run-off.</li> <li>The policy should be more flexible with regard to natural drainage.</li> </ul>
<p><b>Heritage</b></p> <ul style="list-style-type: none"> <li>Development would have an impact on Walshaw Cross and historic cottages and farms at Bradshaw Road/Four Lane Ends.</li> <li>Should preserve open spaces around Christ Church to retain setting.</li> </ul>
<p><b>Other</b></p> <ul style="list-style-type: none"> <li>There would be a reduced quality of life from the construction process, which will be disruptive and detrimental to amenity and likely increase crime.</li> <li>Online consultation form was difficult to complete. Not everyone has internet access. The document contains too much jargon. We need plain English.</li> <li>This has been a developer-led process.</li> <li>Unfair that most Green Belt loss proposed in north. Unclear why previous draft allocations in north of the borough have been rejected.</li> <li>More bus/Metrolink/park and ride interchanges needed, remove bus lanes, widen roads, more ring roads needed, better linkages to motorway. Improved access to North Manchester General Hospital required.</li> <li>Housing need should be met through a new town. Should negotiate with surrounding authorities and extend timeframe to 15 years.</li> </ul>
<p><b>Response to comments</b></p> <p><u>Principle / scale of development</u></p> <p>The Walshaw allocation seeks to deliver around 1,250 houses, delivering a broad mix of homes designed to diversify the type of accommodation available in Bury, and include affordable the provision of affordable housing to address local housing need. The number of new homes will require significant improvements to the local highway network, provision of new facilities for a primary school and contributions to offsite secondary school provision along with a new accessible local centre, health and community facilities.</p> <p>The allocation is already well connected to the existing urban area and is in a sustainable location. The scale of the proposed allocation presents an opportunity to deliver the necessary infrastructure required to support the proposed development including new and improved highways infrastructure and opportunities for cycling and walking routes. The allocation will also increase the provision of publicly accessible multifunctional green and blue infrastructure to provide health benefits to residents and create a visually attractive environment.</p> <p><u>Housing (inc affordable housing)</u></p> <p>Policy GM-H4 covers density of new housing and seeks to maximise average density of new housing in accessible locations. The provision of a range of housing tenures and types is addressed by GMSF thematic policies specifically GM-H2 Affordability of New</p>

Housing and GM-H3 Type, Size and Design of New Housing. The allocation policy requires the delivery of a broad mix of houses which includes an appropriate mix of house types and sizes and accommodation for older people. The provision of affordable housing equivalent to at least 25% of the dwellings on the site across a range of housing types and sizes.

#### Employment and Economy

The allocation policy includes a requirement to ensure that the design and layout of the allocation allows for the effective integration of the allocation with surrounding communities, including active travel links and connections to the recreation areas at Dow Lane, Elton Vale, Whitehead Lodges as well as Walshaw Village and Bury Town Centre.

#### Green Belt:

The policies contained within the GMSF should be read as a whole, in relation to Green Belt Policy GM-10 covers the Greater Manchester Green Belt, the policy should be read in conjunction with the Green Belt Assessment and the Exceptional Circumstances justification paper which sets out the case for exceptional circumstances for the Green Belt proposals as a whole and the specific case for this allocation.

#### Brownfield

Policy GM-H1 covers the scale, distribution and phasing of new housing development and demonstrates that brownfield land will be the predominant source of land over the plan period. A large number of previously developed sites suitable for housing are identified in the council's Brownfield Land Register and its Strategic Housing Land Availability Assessment (SHLAA) however these sites are insufficient to meet Burys identified need and as such there is a need to identify additional sites.

#### Transport – Highways / Public Transport / Cycling / Walking

Transport analysis contained in the Locality Assessment has identified necessary mitigation to accommodate any additional traffic generated by the proposed allocation. The allocation policy sets out specific requirements for new and improved highways infrastructure including the provision of a new strategic through road to enable an alternative to Church Street, Bank Street and High Street that is designed to be suitable for buses and incorporates active travel. Offsite highway works will also be required where these are necessary to ensure acceptable traffic movement, including access through the Elton Reservoir link road.

The allocation policy also makes provision for major investment in public transport in order to encourage more sustainable transport choices (including potential upgrade of existing bus services or a new bus service linking Tottington – Walshaw – Elton – proposed new Metrolink stop at Warth – Bury/Radcliffe).

A network of safe cycling and walking routes will also be delivered through the allocation linking neighbourhoods with key destinations.

#### Physical Infrastructure and utilities

The allocation policy sets out a specific requirement for a masterplan to be approved before any planning applications are submitted. The masterplan will include a clear phasing strategy as part of an integrated approach to the delivery of infrastructure to support the scale of the development as a whole. The policy should also be read in conjunction with the Utilities Assessment for Walshaw. Capacity and efficient use of utilities and infrastructure is addressed by GMSF thematic policy GM-D1 Infrastructure Implementation.

#### Social Infrastructure

The allocation policy makes provision for a new one-form entry primary school within the allocation to accommodate additional demand for school places. The policy also requires a financial contribution towards off-site secondary school provision to meet the needs generated by the development. The policy also includes requirements for provision of a new local centre in an accessible location which include a range of appropriate retail, health and community facilities and to ensure that they are integrated with existing communities. The need for the provision of new or improved health facilities is addressed by policy GM-E6 which should be read in conjunction with the allocation policy.

#### Environmental – Green Infrastructure, Biodiversity, open space

The policy sets out a requirement to minimise impacts on and provide net gains for biodiversity assets within the allocation in accordance with Policy GM-G10 – A Net Enhancement of Biodiversity and Geodiversity, it is expected that the biodiversity gain provision will be focussed on the Walshaw and Elton Brook corridors. The policy makes provision for recreation facilities to meet the needs of prospective residents and also for the provision of new, high quality, publicly accessible, multifunctional green and blue infrastructure within the allocation in accordance with GM-G2 Green Infrastructure Network and policy GM-G9 - Standards for a Greener Greater Manchester and supporting Ecology reports.

#### Air Quality

The policies contained within the GMSF should be read as a whole, in relation to Air Quality this is covered by policy GM-S6 – Clean Air, the GMSF policy should be read in conjunction with the Walshaw Air Quality Statement.

#### Flood risk

Policy GM-S5 covers flood risk and the water environment and makes specific reference to sustainable drainage systems (SuDS) this should also be read in conjunction with the accompanying Strategic Flood Risk Assessment (SRFA) and the Walshaw Flood Risk Assessment. The policy makes specific reference to the requirement for on-site measures to deal with surface water and control the rate of surface water run-off in line with the hierarchy of drainage options ensuring, wherever possible, that they are designed as multi-functional green infrastructure connecting to the wider green infrastructure network.

#### Heritage

The policy sets out requirements to protect and enhance heritage and archaeological assets and their setting within the allocation and the wider historic character of the surrounding area including the Grade II\* Listed building, Christ Church. The policy should be read with the Walshaw Heritage Assessment. Heritage is addressed by GMSF thematic policy GM-E2 along with the accompanying GMSF Heritage Environment Background paper.

**Further comments on the overall proposals for Bury, including strategic transport interventions (311 comments)**

<p><b>Principle / scale of development</b></p> <ul style="list-style-type: none"> <li>Proposed development puts more pressure on an area already densely populated and adversely affected by traffic problems.</li> <li>Need for even distribution of development across the Borough.</li> <li>The plan should promote urban regeneration.</li> <li>It is questioned as to why some development is taking place beyond the plan period.</li> </ul>
<p><b>Housing (inc affordable housing)</b></p> <ul style="list-style-type: none"> <li>Many comment stated that the 2016 household projections should have been used rather than 2014 as less release of land is needed.</li> <li>There should renegotiate with adjacent authorities to reduce need in Bury and Greater Manchester</li> <li>Need to prioritise affordable housing and this should be up to 50% of any new development</li> <li>There is a need for a mix of house types and sizes including aspirational family homes and some reassurance that these will be for local people</li> <li>Priority should be given to higher density apartments on brownfield sites.</li> </ul>
<p><b>Employment and Economy</b></p> <ul style="list-style-type: none"> <li>The jobs to be created at Northern Gateway will be poorly paid and low skilled.</li> </ul>
<p><b>Green Belt</b></p> <ul style="list-style-type: none"> <li>There seems to be a higher proportion of Green Belt release in Bury compared to other districts. Bolton, for example, is not considering any release.</li> <li>Green Belt seems to be only being released in deprived areas with the more affluent areas gaining</li> <li>There were queries as to what uses are retained in the Green Belt e.g. cemeteries.</li> </ul>
<p><b>Brownfield</b></p> <ul style="list-style-type: none"> <li>Only brownfield development is needed and this could be using already vacant land. There are lots of opportunities on existing or former employment land, should as using the space above shops.</li> <li>There was support for more housing in town centres especially given the level of empty shop units in Bury.</li> </ul>
<p><b>Transport – Highways / Public Transport / Cycling / Walking</b></p> <ul style="list-style-type: none"> <li>Increase in road traffic, particularly at Bury Bridge, can be unsafe to cross currently. Roads in very poor condition.</li> <li>The interventions proposed were deemed as being inadequate by many respondees. The link road at Elton Reservoir needs to be provided sooner and Simister Island needs improvement. There is a need for other “off-site” road interventions such as a one-way system in Bury town centre, new A roads into the town centre, widening of Bass Lane in Summerseat and upgrade to roads near Fairfield Hospital.</li> <li>Metrolink was also highlighted to be at full capacity with a need for more frequent and longer trams. Similarly, bus services were inadequate and do not provide a suitable alternative to Metrolink. There is a need put forward for better connections to villages in the north and west and walking/cycling infrastructure is said to be poor and needs improvement, including along canal towpath.</li> <li>There were suggestions put forward including more town centre parking, car share schemes, the use non road alternatives west and east including use of East Lancashire Railway to Manchester and also north to Rossendale, new Metrolink routes to Bolton and Oldham, upgrade to Radcliffe park and ride facilities and the need for park and ride at Elton Reservoir stop.</li> </ul>

<p><b>Physical Infrastructure and utilities</b></p> <ul style="list-style-type: none"> <li>• In terms of infrastructure, such things as the link road and Metrolink stop were argued as needing to be in place now and certainly before any Green Belt release.</li> <li>• There was general concern at the lack of capacity in utilities networks to meet demand.</li> </ul>
<p><b>Social Infrastructure</b></p> <ul style="list-style-type: none"> <li>• Existing schools were highlighted as being in disrepair, needing improvement and not adequate to meet needs. There is also a need for further secondary school provision, health provision and leisure/well being facilities particularly in Radcliffe..</li> </ul>
<p><b>Environmental – Green Infrastructure, Biodiversity, open space</b></p> <ul style="list-style-type: none"> <li>• There were concerns raised with the loss of recreation space, the loss of wildlife, impact on trees</li> <li>• There was particular mention of Seedfield and in particular how the access to Burrs be improved.</li> </ul>
<p><b>Air Quality</b></p> <ul style="list-style-type: none"> <li>• It was highlighted that there was a potential for the development to increased carbon emissions and greenhouse gases.</li> </ul>
<p><b>Flood risk</b></p> <ul style="list-style-type: none"> <li>• There were concerns that risk of flooding will increase.</li> <li>• In particular it was highlighted that the Plan needs to address pollution along Kirklees Valley.</li> </ul>
<p><b>Heritage</b></p> <ul style="list-style-type: none"> <li>• There was a concern of the impact on medieval farmsteads and hedgerows and in particular the ancient monuments along the route of the link road at Elton Reservoir.</li> </ul>
<p><b>Response to comments</b></p> <p><u>Principle / scale of development</u>  Policy GM – Strat 6 – Northern Areas states that a significant increase in competitiveness of the northern areas will be sought. There will be a strong focus on prioritising the re-use of brownfield land through urban regeneration This will be complemented by improvements to transport connectivity and the selective release of Green Belt in key locations that will help to boost economic opportunities and diversify housing provision (GM-Strat 7 and GM-Strat 8).</p> <p>It is considered necessary to release the allocations in full at this stage given that the scale of the proposed development means that it will need to be supported by significant strategic infrastructure and this level of investment needs the certainty that the remaining development and associated economic benefits will still be able to come forward beyond the plan period.</p> <p><u>Housing (inc affordable housing)</u>  National Planning Policy states that the targets for housing should be based on a standard methodology adopted in National Planning Guidance by the Government. For the purposes of producing a plan like the GMSF, the Government has consulted on a requirement for Local Authorities to use the 2014 based household projections as the basis for determining housing need.</p> <p>Through the GMSF process the Council has already managed to reduce its housing target by redistributing some of its need to other Greater Manchester Authorities.</p> <p>The provision of a range of housing tenures and types is addressed by GMSF thematic Policies specifically GM-H2 Affordability of New Housing and GM-H3 Type, Size and Design of New Housing. Policy GM-H4 covers density of new housing and seeks to maximise average density of new housing in accessible locations. The allocation Policies</p>

include requirements for the delivery of a broad mix of houses which includes an appropriate mix of house types and sizes and accommodation for older people. The allocation policies require the provision of affordable housing equivalent to at least 25% of the dwellings on the site across a range of housing types and sizes.

#### Employment and Economy

The allocation Policies (GM1.1 and GM1.2) include requirements to ensure that the design and layout allows for effective integration with surrounding communities, including active travel links and connections to local services, employment opportunities between Heywood/Pilsworth and Simister/Bowlee. The Policy justification for GM1.1 considers that whilst the location of this allocation along the M62 corridor will be particularly attractive to the logistics sector, it is important that it provides high quality business premises for a range of other sectors including advanced manufacturing and higher value knowledge based businesses. The variety will not only provide a better range of good quality jobs but has the potential to provide premises for new and growing sectors, this diversifying both the local and sub regional economy. The allocation Policies should be read in conjunction with thematic Policy GM-P 1 – Supporting Long Term Economic Growth.

#### Green Belt

The Policies contained within the GMSF should be read as a whole, in relation to Green Belt Policy GM-10 covers the Greater Manchester Green Belt, the Policy should be read in conjunction with the Green Belt Assessment and the Green Belt Exceptional Circumstances justification paper which sets out the case for exceptional circumstances for the Green Belt proposals.

#### Brownfield

Policy GM-H1 covers the scale, distribution and phasing of new housing development and demonstrates that brownfield land will be the predominant source of land over the plan period. Issues relating to previously developed land are addressed by thematic Policy GM-S1.

#### Transport – Highways / Public Transport / Cycling / Walking

Transport analysis contained in the Locality Assessments has identified necessary mitigation measures to accommodate any additional traffic generated by the proposed allocations. The allocation policies set out specific requirements for new and improved highways infrastructure, public transport infrastructure and cycling and walking routes through the allocations.

#### Physical Infrastructure and utilities

The allocation policies set out a specific requirement for masterplans to be approved before any planning applications are submitted. The masterplans will include clear phasing strategies as part of an integrated approach to the delivery of infrastructure to support the scale of development as a whole. Capacity and efficient use of utilities and infrastructure is addressed by GMSF thematic Policy GM-D1 Infrastructure Implementation.

#### Social Infrastructure

The allocation policies include specific requirements for social infrastructure such as primary and secondary school provision, local centres providing a range of appropriate retail and health and community facilities.

#### Environmental – Green Infrastructure, Biodiversity, open space

The allocation policies set out a requirement to minimise impacts on and provide net gains for biodiversity assets within the allocations in accordance with Policy GM-G10 – A Net Enhancement of Biodiversity and Geodiversity. The allocation policies should be read in

conjunction with Policy GM-G2 Green Infrastructure Network and Policy GM-G9 Standards for a Greener Greater Manchester.

Air Quality

The policies contained within the GMSF should be read as a whole, in relation to Air Quality this is covered by Policy GM-S6 – Clean Air.

Flood risk

Thematic Policy GM-S5 covers flood risk and the water environment and makes specific reference to sustainable drainage systems (SuDS) this should also be read in conjunction with the accompanying Strategic Flood Risk Assessment (SRFA) and site specific Flood Risk Assessments.

Heritage

The allocation policies set out requirements to protect and enhance heritage and archaeological assets and their setting within the allocation in accordance with the findings and recommendations of a Heritage Impact Assessments. Heritage is addressed by GMSF thematic policy GM-E2 along with the accompanying GMSF Heritage Environment Background Paper.



### 3.2.4. Strategic Allocations in Manchester

There are 3 allocations in Manchester. 296 comments were received in relation to the Manchester allocations.

#### GM Allocation 10: Global Logistics (82 comments)

There was general opposition to airport/flights expansion, particularly due to the impact on climate change as well as to the loss of green belt/green space. It was highlighted that there would be harm to wildlife, particularly the Site of Biological Importance/Site of Special Scientific Interest/ancient woodland, River Bollin, and environmental mitigation required on-site for previous airport expansion.

There is some support for economic reasons put forward for the development but also there is a counter argument put forward for no growth or development.

<p><b>Principle / scale of development</b></p> <ul style="list-style-type: none"> <li>• The airport has already taken up far too much green space.</li> <li>• The development requirement figures are wrong. The impact of Brexit has not been factored in and current government policy is driving numbers.</li> <li>• Huge parts of the existing airport site are underutilised (e.g. used for carparks).</li> <li>• Development should be focused elsewhere in South Manchester.</li> <li>• The allocation should only be used for business that genuinely depends on close proximity to the airport. To do otherwise risks placing other areas currently in the Green Belt under pressure for essential airport-linked development.</li> <li>• The reference to high quality design and construction standards including the use of sustainable drainage systems has been removed since the previous consultation on this policy. To support wider plan policies and objectives as well as for consistency reasons, we would support additional reference to the use of Sustainable Urban Drainage (SuDS) and a wider net gain approach for this site.</li> </ul>
<p><b>Employment and Economy</b></p> <ul style="list-style-type: none"> <li>• Airport logistics and infrastructure are key to any successful city/region.</li> <li>• The proposals will bring international business to Greater Manchester.</li> <li>• Support expansion allied to the development of HS2 (development of a multi modal transport offer).</li> <li>• Proposals will maximise the potential of the Enterprise Zone.</li> <li>• Warehouse jobs may be relocated from elsewhere (where they are more needed); there will not be new jobs as a result.</li> </ul>
<p><b>Green Belt</b></p> <ul style="list-style-type: none"> <li>• No exceptional circumstances for the loss of Green Belt have been demonstrated.</li> <li>• The proposals should be amended to avoid/minimise the loss of Green Belt/green space/natural environment.</li> <li>• This area of Green Belt is an important barrier to prevent urban sprawl from Manchester Airport.</li> <li>• The overall quantity of Green Belt loss is excessive.</li> <li>• Where Green Belt is developed, it should be for affordable housing for local people.</li> </ul>
<p><b>Transport – Highways / Public Transport / Cycling / Walking</b></p> <ul style="list-style-type: none"> <li>• We need to keep the Airport to the eastern side of M56.</li> <li>• The Airport is already too big.</li> <li>• Concerned about traffic congestion/inadequate public transport provision.</li> </ul>

<ul style="list-style-type: none"> <li>• The infrastructure is saturated. No concessions have been made for any of the additional traffic/commuting.</li> <li>• Concerned about the impact on residents with Airport parking happening outside their houses.</li> <li>• Transport of goods to and from the Airport by road is not a sustainable proposition.</li> </ul>
<p><b>Environmental – Green Infrastructure, Biodiversity, open space</b></p> <ul style="list-style-type: none"> <li>• There would be a loss of outdoor space and a loss of access to the countryside.</li> <li>• Concerned about the potential harm to wildlife and biodiversity.</li> <li>• Proposed development is of close proximity to Sites of Biological Importance, Sites of Special Scientific Interest, ancient woodland and the River Bollin.</li> <li>• Environmental mitigation required on-site for previous airport expansion.</li> <li>• The boundary of this allocation should be revised to avoid Sunbank Wood and the Ponds Local Wildlife Site. In addition to protecting the LWS this would also provide a buffer to the adjacent Cotteril Clough Site of Special Scientific Interest. The protection of these sites is required in the text of the allocation so the simplest way to action this would be to not include them in the allocation.</li> </ul>
<p><b>Air Quality</b></p> <ul style="list-style-type: none"> <li>• Concern that the additional development will contribute to further poor air quality in the area (combination of pollution from the airport and the increase in traffic on the M56).</li> <li>• The airport currently causes significant air pollution and noise disturbance for residents in Woodford, as well as Heald Green, Gatley and Cheadle Hulme. This would be made worse by increased number of flights.</li> <li>• The site currently provides a ‘green lung’ (role in reducing air pollution).</li> </ul>
<p><b>Heritage</b></p> <ul style="list-style-type: none"> <li>• The site is located approximately 1.5 km from Quarry Bank Mill.</li> <li>• The setting of Quarry Bank Mill estate should be taken into account – specifically concerning the design of new buildings, which could potentially be visible from the estate.</li> </ul>
<p><b>Other</b></p> <ul style="list-style-type: none"> <li>• Further expansion of the airport/air freight is contrary to the need to tackle climate change.</li> <li>• The number of flights should be reduced not increased.</li> <li>• Proposals would attract industry that will necessitate large amounts of air or road travel. This cannot be sustainable in the long term and is incompatible with climate change targets.</li> <li>• The development would lead to an increase in light and noise pollution.</li> </ul>
<p><b>Response to Comments</b></p> <p>The site selection paper identifies that Global Logistics meets criteria 2.</p> <p>The proposed allocation provides for an expansion of the logistics offer that has been established at the airport.</p> <p>Policy GM-S5 covers various factors to ensure development is resilient to potential physical, social, economic and environmental challenges. The supporting text includes specific reference to the application of SuDS. Moreover, Policy GM-G9 covers the concept of net gain with respect to Green Infrastructure. These policies needs to be read across with the specific allocation policies.</p> <p>The case for exceptional circumstances is set out for the Green Belt proposals as a whole and the specific case for this allocation in the accompanying Green Belt Background Paper.</p>

Transport analysis contained in the locality assessment has identified necessary mitigation to accommodate any additional traffic generated by the proposed allocation.

The policy sets out the need to minimise any adverse impact on national and locally designated assets of conservation, ecological and landscape value. In particular, development should avoid the Cotterill Clough SSSI, nearby SBIs and ancient woodland, and any existing landscape mitigation affected by development must be appropriately re-provided.

The Integrated Appraisal (IA) identifies that the allocation is within 150m of an existing AQMA. The policy for the allocation incorporates wording that aligns with the mitigation suggested in the IA. The IA also identifies the allocation will need to respond to climate change impacts which can be achieved through careful design as a result subsequent masterplanning.

The impacts of additional flights is a matter for national and international policy – the UK Government published its green paper, “Aviation 2050 – the future of UK Aviation” in late 2018. The Government’s response to the consultation on the green paper is awaited.

**GM Allocation 11: Roundthorn Medipark Extension** (72 comments)

There is a general opposition to loss of green belt and a belief that the development is not needed mainly due to the number of empty units nearby. It was also felt that brownfield sites should be used first and there would be increased congestion due to the development.

There was some support in relation to the generation of high value jobs and growth in general although there was also some opposition to this view

<p><b>Principle / scale of development</b></p> <ul style="list-style-type: none"> <li>Local people will not benefit from the jobs created.</li> <li>There are existing empty units nearby and therefore no need for additional office space.</li> <li>The proposals would lead to over-development of the area.</li> <li>The proposals would lead to a displacement of jobs from other areas where they are needed.</li> <li>Concerns expressed about the phasing of this site as the location is far away from existing infrastructure, which would suggest that this site would not come forward in the short term. Therefore, it will not be delivered in the first five years of the plan.</li> <li>Disappointing that the reference to high quality design and construction standards including the use of sustainable drainage systems has been removed since the previous consultation on this policy. To support wider plan policies and objectives as well as for consistency reasons, we would support additional reference to the use of Sustainable Urban Drainage (SuDS) and a wider net gain approach for this site.</li> </ul>
<p><b>Green Belt</b></p> <ul style="list-style-type: none"> <li>There is a need to retain Green Belt to prevent urban sprawl and to keep separation from the Airport.</li> <li>No exceptional circumstances have been demonstrated for the proposals.</li> <li>The quality of the Green Belt in this location is not great. It has been proposed since WW2 to expand the city across this area and the Davenport Green area. HS2, the western link to the airport, Metrolink and the under supply of housing across South Manchester are all good reasons to release Green Belt in these areas.</li> <li>Releasing land from the Green Belt would have a negative impact on people’s mental health.</li> <li>Releasing land from the Green Belt would reduce in a loss of farmland.</li> </ul>
<p><b>Transport – Highways / Public Transport / Cycling / Walking</b></p> <ul style="list-style-type: none"> <li>Additional development would lead to excessive traffic and congestion in the area.</li> <li>The proposals would impair access to the hospital.</li> <li>It is important to safeguard the extension of Metrolink to maximise the benefits of the Western Extension through to Terminal 2, Davenport Green and the proposed HS2–NPR rail station. Also, need to ensure that suitable transport infrastructure is provided at the earliest opportunity to avoid putting pressure on an already congested road network. Airport passengers need reliable, efficient and punctual transport infrastructure due to the criticality and time sensitivity of airport journeys for both passenger and freight movements.</li> </ul>
<p><b>Environmental – Green Infrastructure, Biodiversity, open space</b></p> <ul style="list-style-type: none"> <li>The proposals would have a harmful impact on nature.</li> <li>Any development of the site requires high quality natural landscaping, including the provision of appropriate native species. This should be delivered adjoining the Fairywell Brook to help to mitigate flood risk, improve ecological connectivity, and promote biodiversity.</li> </ul>

- Fairywell Brook is monitored under the EU Water Framework Directive (within the Sinderland Brook catchment) and is a designated Heavily Modified waterbody. The waterbody is currently at moderate status and therefore is not meeting its objective under the EU Water Framework Directive and North West River Basin Management Plan. Whilst this is welcomed the policy should be strengthened to support both the Water Framework Directive and GMSF Policy GM-G 3 (River Valleys and Waterways) ambitions which seek to “enhance” and “return rivers to a more natural state”. As currently worded, the policy only implies that enhancement should only be provided to areas alongside the watercourse.
- The Roundthorn Medipark Extension site allocation provides opportunities to secure net gains for nature and local communities, as outlined in paragraphs 8, 32, 170 and 174 of the National Planning Policy Framework. For this site allocation net gains can be applied to Green Infrastructure and the site should seek to work in partnership with the neighbouring Timperley Wedge (Policy GM Allocation 46).
- Concerned that air quality will get worse because of the additional development.

**Flood risk**

- There is potential flood risk in the proposed allocation area.
- Since the last plan consultation the Environment Agency has been looking at future flood risk schemes for inclusion within the next Flood and Coastal Risk Management Programme (post 2021). As part of this, they have identified ‘communities’ at risk of flooding to start to consider viable projects for Government funding. Downstream from this allocation there are a number of properties at risk of flooding. As such, the development of this site has the potential to take a strategic approach to flood risk management and provide additional opportunities for upstream flood storage. Therefore, they would welcome additional text against recommendation 7 to have a requirement to ‘seek opportunities to provide net gains in flood storage for the wider catchment’.

**Other**

- Concerns raised about additional light and noise pollution because of the proposals.
- This is a small area connected to the hospital complex. Development considered to potentially be reasonable if the adjoining Timperley Wedge proposal does not go ahead, subject to careful ecological assessment and appraisal of other options in the area for the proposed buildings.

**Response to Comments**

Site selection paper identifies that Medipark meets criteria 2, 5 and 6.

The employment proposals focus on attracting investment from knowledge-based industries to a high quality development. The location, being close to a major hospital and with improvements to local transport infrastructure, including Metrolink, can ensure that the proposed allocation plays its full part in maximising future economic growth. The proposed arrival of HS2, including the airport station a short distance to the south, will provide a further stimulus to economic activity in this area.

Policy GM-S5 covers various factors to ensure development is resilient to potential physical, social, economic and environmental challenges. The supporting text includes specific reference to the application of SuDS. Moreover, Policy GM-G9 covers the concept of net gain with respect to Green Infrastructure. These policies needs to be read across with the specific allocation policies.

The expectation is that the site would be delivered in the later part of the plan period.

The case for exceptional circumstances is set out for the Green Belt proposals as a whole and the specific case for this allocation in the accompanying Green Belt Background Paper.

Transport analysis contained in the locality assessment has identified necessary mitigation to accommodate any additional traffic generated by the proposed allocation.

The extension to Metrolink route is safeguarded by way of the existing Transport Works

The policy for the allocation incorporates wording that aligns with the mitigation suggested in the IA.

Suggested changes to refer to Wythenshawe Hospital have been made to the revised policy and supporting text.

Policy GM-S5 covers various factors to ensure development is resilient to potential physical, social, economic and environmental challenges. The supporting text includes specific reference to the application of SuDS.

**GM Allocation 12: Southwick Park** (57 comments)

There were comments opposing the loss of green belt and in particular the loss of a park/recreational space/play area. Some felt that the site was unsuitable for housing due to the motorway and also in particular due to air pollution.

There was some support, however, for the development with some highlighting that there was not a significant number of houses to cause too much harm

<b>Principle / scale of development</b>
<ul style="list-style-type: none"> <li>• The proximity of the site to the motorway makes it an unsuitable site for housing due to air, noise and light pollution.</li> <li>• There are insufficient jobs locally for any new houses to be built on the site.</li> <li>• The site links well to existing housing in the area.</li> <li>• Allocation for around 20 new homes, which suggests that sites do not need to be strategic in scale in order to be allocated in GMSF.</li> </ul>
<b>Green Belt</b>
<ul style="list-style-type: none"> <li>• No exceptional circumstances demonstrated for the removal of Green Belt.</li> <li>• The M60 represents a logical boundary for the Green Belt.</li> </ul>
<b>Transport – Highways / Public Transport / Cycling / Walking</b>
<ul style="list-style-type: none"> <li>• The site has good transport links.</li> <li>• The site would have a harmful impact on traffic levels.</li> </ul>
<b>Social Infrastructure</b>
<ul style="list-style-type: none"> <li>• Oppose the loss of a park/recreational space.</li> </ul>
<b>Environmental – Green Infrastructure, Biodiversity, open space</b>
<ul style="list-style-type: none"> <li>• Currently have no knowledge of this site's biodiversity assets nor its position in identified ecological networks.</li> <li>• Highlight that other Allocation Policies include a reference to the requirement to deliver a net gain as part of the strategic approach to site delivery. However, this Policy Allocation does not include this. Therefore, for consistency and to support wider plan objectives we recommend that this is included.</li> <li>• Suggested that the proposal will be harmful to existing wildlife on the site.</li> </ul>
<b>Air Quality</b>
<ul style="list-style-type: none"> <li>• This is a protected Green Belt site on the border of Manchester and Salford, in proximity to an Air Quality Management Area along the M60 motorway.</li> </ul>
<b>Other</b>
<ul style="list-style-type: none"> <li>• To support wider plan policy requirements (specifically Policy GM-S 5) we would recommend that additional wording includes reference to “soft” or “green” Sustainable Urban Drainage (SuDS). Green SuDS have greater environmental benefits over hard-engineered options (e.g. underground tanks/pipes) (policy wording suggested).</li> <li>• Suggested that development of the site will lead to harm in terms of mental well-being/quality of life of any future residents occupying the houses.</li> <li>• Harmful impact to climate change identified.</li> </ul>
<b>Response to Comments</b>
<p>Site selection paper identifies that Southwick Park meets criteria 1 and 5.</p> <p>The case for exceptional circumstances is set out for the Green Belt proposals as a whole and the specific case for this allocation in the accompanying Green Belt Background Paper.</p>

Transport analysis contained in the locality assessment has identified necessary mitigation to accommodate any additional traffic generated by the proposed allocation.

Policy GM-S5 covers various factors to ensure development is resilient to potential physical, social, economic and environmental challenges. The supporting text includes specific reference to the application of SuDS. Moreover, Policy GM-G9 covers the concept of net gain with respect to Green Infrastructure. These policies needs to be read across with the specific allocation policies.



**Further comments on the overall proposals for Manchester, including strategic transport interventions (85 comments)**

<b>Housing (inc affordable housing)</b>
<ul style="list-style-type: none"> <li>• The supply and demand issue of housing and the need to build so many new houses is linked to mass immigration</li> <li>• the housing being put forward by developers are 3/4 &amp; 5 bedroomed houses. These are not affordable/social home of benefit to the local community</li> </ul>
<b>Employment and Economy</b>
<ul style="list-style-type: none"> <li>• Some support that development close to Manchester Airport makes economic sense and does not disrupt the current Green Belt too heavily</li> </ul>
<b>Green Belt</b>
<ul style="list-style-type: none"> <li>• There is general opposition to the loss of green belt and green spaces and that the need to do this has not been established as there are no exceptional circumstances</li> <li>• The loss of green belt would affect the buffer zone to stop urban sprawl particularly near the airport</li> </ul>
<b>Brownfield</b>
<ul style="list-style-type: none"> <li>• Brownfield land should be built on first. Manchester does not seem to have offered many sites at all compared to other areas. This is surprising given the amount of brownfield areas that could be redeveloped. There needs to be a stimulation of redevelopment of brownfield sites across the city rather than using green space</li> </ul>
<b>Transport – Highways / Public Transport / Cycling / Walking</b>
<ul style="list-style-type: none"> <li>• HS2 not yet certain; and development should not be based on it until it is certain. The money for this would be spent on local transport</li> <li>• The roads in Manchester are too congested already and the infrastructure is already at saturation point</li> <li>• Schemes such as relief roads/by-passes, car shares, the possibility of longer journeys on public transport and better cycling and walking infrastructure are all put forward</li> <li>• There should be better connection between north and south Manchester by public transport to access jobs and public transport</li> <li>• Whilst there is some support for development near the airport there is some oppose airport / flights expansion (climate change)</li> <li>• South Manchester different from North Manchester</li> <li>• Good, inexpensive public transport and improved road links must be provided to allow workers from all areas especially North Manchester to commute to the jobs created in South Manchester.</li> </ul>
<b>Environmental – Green Infrastructure, Biodiversity, open space</b>
<ul style="list-style-type: none"> <li>• Concern that development will cause harm to nature and wildlife</li> <li>• Nature being incorporated into the built environment should be a selling point for developers. It is an opportunity to enhance reputations in terms of pro-actively working for nature and people; as well as complying with national requirements to conserve biodiversity. For example making homes for swifts and other species which live in the urban environment should be a simple, low-cost but highly effective measure.</li> </ul>
<b>Air Quality</b>
<ul style="list-style-type: none"> <li>• Concern Building on Green Belt directly opposes what you say about keeping our air clean and giving our future generations a greener city</li> <li>• Noise pollution</li> </ul>

**Other**

- Medipark and Timperley Wedge should be masterplanned together
- Investment should be throughout South Manchester not just at the airport
- There should be a focus on the redevelopment of town centres

**Response to Comments**

The GMSF plans for range of housing and the evidence base supporting the plan demonstrates the need for the quantum and type of housing proposed.

Note the support for Manchester Airport and have carefully considered the proposed Green Belt release for the allocation at Global Logistics as set out in evidence and background papers.

The case for exceptional circumstances is set out for the Green Belt proposals as a whole and the specific case for allocations in the accompanying Green Belt Background Paper.

Much of the housing land supply in Manchester is on brownfield land.

The transport points are noted and have been considered both within the GMSF and the wider transport strategies both at the Greater Manchester and city of Manchester geographical levels.

The GMSF contains policies that seek to deliver a net gain in Biodiversity.

The proposed allocations in Manchester have been appraised through the Integrated Appraisal and where appropriate, air quality mitigation has been identified in the policies.

Medipark and Timperley Wedge have been considered together in developing the Draft GMSF 2020 particularly in respect of transport impacts and mitigation set out in the localities assessment. Work will continue on planning the two allocations in a complementary manner.

Investment is planned in South Manchester as well as at the airport.

The Draft GMSF 2020 includes policies to encourage investment and redevelopment in town centres.

### 3.2.5. Strategic Allocations in Oldham

There are 10 allocations in Oldham. There were 8,130 comments received in relation to the Oldham allocations.

#### **GM Allocation 13: Ashton Road Corridor (240 comments)**

The majority of objections in relation to Bardsley site and on the whole less opposition to Coal Pit Lane site. With regards to Bardsley there was some specific transport comments including those related to highways with the proposed access being on a hill which is a blackspot, at the most narrow point of Ashton Road, opposite the Smokies entrance. It was felt that the level of public transport provision had been overstated with services already being recently reduced. With regards to Green Belt it was pointed out that there was refusal of a planning application in 1982 which referring to the Green Belt retained to preserve Medlock Valley. There were concerns about ecology and in particular regarding the impact on SBIs and wildlife. It was highlighted that a constraint on the site is a high pressure CADENT gas pipe which cuts through the site.

The Coal Pit Lane site was objected to on the grounds of highways and in particular the lack of pavement which is already unsafe. Constraints on the site were highlighted in relation to it being former pit shaft head, covered in slag heaps and the ground being sunken which made the site unviable.

<b>Principle / scale of development</b>
<ul style="list-style-type: none"> <li>• Oldham is taking an unequal spatial distribution of development.</li> <li>• Development at the site adjoining Bardsley Vale Avenue would be too close to Medlock Valley and overshadow it.</li> </ul>
<b>Housing (inc affordable housing)</b>
<ul style="list-style-type: none"> <li>• The housing being put forward by developers will be three, four and five bed houses that will not be affordable for local residents.</li> <li>• Affordable housing would not make enough profit in this area.</li> <li>• The housing requirement was based on incorrect ONS figures and GMCA should challenge them. If projections published in Sept 2018 were used it there would be no need to release Green Belt land for development.</li> <li>• These developments mean Oldham is going above its housing requirement.</li> <li>• Putting those in housing need in low growth areas is questionable.</li> <li>• There are a number of empty houses in Oldham and if they were better managed, it would alleviate the need to use Green Belt land.</li> <li>• Affordable homes should not be at the cost of green space.</li> <li>• Build homes would be readily available to accommodate the elderly and disabled.</li> <li>• There is a need for more environmentally friendly homes.</li> </ul>
<b>Green Belt</b>
<ul style="list-style-type: none"> <li>• The development of the site adjacent to Bardsley Vale Avenue would reduce the Green Belt boundary, where it is already very narrow. Quote from a Planning Inspector in 1982 when refusing an appeal submitted stating that the Green Belt in this area ‘in not particularly wide’ and ‘extremely important to preserve’.</li> <li>• The Inspector’s Report for Oldham’s UDP concluded the land at Bardsley Vale was “of fundamental importance to the narrow stretch of Green Belt which separates Oldham from Ashton-under-Lyne...”</li> <li>• This area of Green Belt was classed as strong in the 2016 assessment.</li> <li>• The proposal would result in the merging of Oldham and Ashton.</li> </ul>

<ul style="list-style-type: none"> <li>• This goes against the main purposes of the Green Belt</li> <li>• The release of Green Belt will set a precedence for the release of more Green Belt in the Medlock Valley.</li> <li>• The development will adversely affect the character and visual impact of the area, which should be preserved in accordance with Green Belt Policy.</li> <li>• The claim that Oldham has reduced Green Belt take is inaccurate, as they have increased the number of sites proposed.</li> <li>• Saddleworth is getting an increase in Green Belt – is this Green Belt land less important than Saddleworths?</li> <li>• The Coal Pit Lane site even though is designated Green Belt; a significant part of it has man-made ground stockpiled spoil. The site has a derelict appearance. It is considered that allocation of the site will encourage the recycling of derelict urban land.</li> </ul>
<p><b>Brownfield</b></p>
<ul style="list-style-type: none"> <li>• There is a need to make more use out of sites within Oldham Town Centre, empty homes and previously developed sites within the urban area.</li> <li>• There has been a lack of transparency regarding brownfield sites (i.e. Hartford Mill and Maple Mill).</li> <li>• Develop the 95.5 hectares of brownfield sites as a matter of priority.</li> </ul>
<p><b>Transport – Highways / Public Transport / Cycling / Walking</b></p>
<ul style="list-style-type: none"> <li>• Traffic is already bad in this area due to the volume of traffic on Ashton Road.</li> <li>• There are highways safety issues particularly around the junction at Smokies.</li> <li>• Unsure the local road network could support proposed development (i.e. Coal Pit Lane, Bardsley Vale Avenue)</li> <li>• The increase in traffic will cause an increase in air pollution.</li> <li>• None of the access points into the sites are suitable, the Bardsley Vale site is situated halfway down a steep hill, is narrow and has a blind spot and Coal Pit Lane has no footpaths and is a busy country lane.</li> <li>• Development will create a "rat run" for traffic going from Coal Pit Lane, Ashton Road to Glodwick and further afield.</li> <li>• There will be disruptions on the road when putting in supporting infrastructure (power, broadband and drainage).</li> <li>• Bus services here are unreliable and were reduced in 2018.</li> <li>• These sites are nowhere near existing Metrolink / rail stations or motorway junctions.</li> <li>• The roads here are already in awful condition and are poorly maintained.</li> <li>• Additional access could be provided from Park Bridge Road subject to improvement works to the road and the junction between Ashton Road and Park Bridge Road.</li> <li>• The site is not observed to be of significant concern due to both the scale of the proposed quantum of development and it not being located within close proximity to the SRN.</li> </ul>
<p><b>Physical Infrastructure and utilities</b></p>
<ul style="list-style-type: none"> <li>• There will be disruptions on the road when putting in supporting infrastructure (power, broadband and drainage).</li> <li>• A major CADENT natural gas pipeline of approximately 220 mm diameter runs from Leeds to Manchester crosses the northern half of Bardsley Vale site. It can be assumed that no building will be permitted above the course of this pipe or within a certain distance on either side to allow for maintenance and emergency access.</li> </ul>
<p><b>Social Infrastructure</b></p>
<ul style="list-style-type: none"> <li>• There is insufficient infrastructure to meet the demands of the new residents. The existing health (doctors, dentists and hospital) and education provision is already stretched and running at over-capacity.</li> </ul>

- There are no schools in Bardsley. Schools in other areas serve the educational needs of all children from the village. The nearby primary schools are running at an over-capacity of 107 places.
- Secondary schools in the area have atrocious standards.
- There is a need to make sure facilities are put in place for the additional people.
- There is a lack of leisure facilities in the area.

### **Environmental – Green Infrastructure, Biodiversity, open space**

- This area is designated as Natural & Semi-Natural Land and includes a Site of Biological Importance.
- The Medlock River has received recent investment and has been developed as a recreational area.
- This land needs to be preserved for self-sufficiency in food production.
- Open spaces and green infrastructure are important for health and well-being.
- Green infrastructure is multi-functional.
- These sites are the only green spaces remaining around this area and should be protected.
- These sites provide important recreational value for local residents (the Council has a duty to ensure these lands remain available for the residential of Oldham to use for recreation, to access nature and wildlife and promote health and well-being).
- The Bardsley Vale site includes two SBI wildlife ponds such as Fennifields Lily Pond.
- The land forms part of the River Medlock Valley and is a wildlife corridor for migrating animals.
- The area is habitat to diverse range of wildlife (including those protected under the Wildlife & Countryside Act 1981), fauna, ancient woodland (recorded as far back as 1154 by the Manor of Ashton) and TPO's on the site.
- Whilst policy states that ponds will be retained it is naïve to think that the wildlife will be remain attracted to the area with the new built development.
- There is potential impact on Daisy Nook Country Park in terms of landscape setting and ecology.
- The site contains hedgerows.
- The site is a healthy lung.
- Further detail on the sites biodiversity assets is needed.
- Where the replacement sports facilities will be located. Will they still be convenient for the communities that use them?
- Recommend street trees on Ashton Road elevations for visual amenity.
- This area was left to the residents of Oldham to be use as recreational land the council has a duty of care to the people of Oldham's well-being, not to destroy it.
- The allocation provides opportunities to secure net gains for nature. For this site net gains can be applied to Green Infrastructure, Deciduous Woodland, Priority Ponds and Protected Species.
- Deciduous Woodland is located central, north east and south east corners of the allocation. Deciduous Woodland is a Priority Habitat. It is important that this site recognise the National Planning Policy Framework concerning the conservation, restoration and enhancement of priority habitats ecological networks as part of the master planning.
- The Bardsley Vale parcel makes a nominal contribution to the purposes of Green Belt and is free of constraints.

### **Air Quality**

- The increase in traffic will cause a rise in air pollution.

<p><b>Flood risk</b></p> <ul style="list-style-type: none"> <li>• The proposed development will increase flood risk and surface water.</li> <li>• The proposal requires the removal of several trees currently protected with tree preservation orders, which add to the visual an-entity of the area. Given the existing water table problem, the removal of such a large grassed area in favour of a largely hard standing area will create further problems.</li> <li>• The area has poor drainage.</li> </ul>
<p><b>Heritage</b></p> <ul style="list-style-type: none"> <li>• The site lies within the setting a Grade II listed building and other buildings of historical importance within its curtilage (Bardsley House, Bardsley Fold Farm and Bardsley Fold Cottage) on which the proposed development would have an adverse impact.</li> </ul>
<p><b>Other</b></p> <ul style="list-style-type: none"> <li>• Many respondents felt a mistrust with the council due to recent planning decisions.</li> <li>• Consultation process inadequate.</li> <li>• Most of Oldham residents cannot afford to pay for family days out, they deserve the right to access green areas free of charge. Oldham is not an affluent town; we are poor on leisure facilities and in the lower 10% of GM well-being, do not take away what few free facilities the residents can enjoy.</li> <li>• Coal Pit Lane site - Records indicate that there are a number of historic landfill sites here. In line with other Allocation Policy approaches and to comply with the National Planning Policy Framework (Para 120-121) we recommend that additional wording is included to reflect the approach this this issue such as: 'Incorporate necessary remediation measures in areas affected by contamination and previously worked for landfill purposes'.</li> <li>• Support from landowners submitted.</li> </ul>
<p><b>Response to comments:</b></p> <p>The parcel south of Bardsley Vale has been removed and is not proposed as a strategic allocation in the GMSF 2020. The land south of Coal Pit Lane (Ashton Road) has been extended to provide around 255 homes. Further details will be available in the allocation's topic paper.</p> <p><b>Principle/ scale of development:</b></p> <p>The site selection paper identifies that Land south of Coal Pit Lane meets the following site selection criteria:</p> <ul style="list-style-type: none"> <li>• <b>Criterion 7</b> – as the site is capable of providing a range of house types and sizes, including affordable housing so as to meet local needs.</li> </ul> <p>In terms of the GMSF Spatial Strategy and Strategic Objectives, Land south of Coal Pit Lane (Ashton Road) is capable of delivering around 255 houses, with a mix of dwelling types and sizes to deliver more inclusive neighbourhoods and meet local needs. As such the allocation contributes to the spatial objective of boosting Northern Competitiveness, within the boroughs of Bolton, Bury, Oldham, Rochdale, Tameside, Wigan and west Salford, through contributing to meeting the housing need across Oldham.</p> <p><b>Housing (incl. affordable housing):</b></p> <p>The housing methodology is covered in the Housing Background Paper.</p> <p>The Housing Background Paper sets out Greater Manchester's Housing Need, including how each district will meet their own housing need and the collective need of GM. It sets</p>

out the proposed methodology for meeting this need across the 10 districts and how this is intended to be delivered in line with the objectives of the plan as a whole. Oldham's current Local Housing Need (LHN) based on the government's standard methodology is for 692 new homes per year. The GMSF 2020 sets out a proposed housing requirement for Oldham of 693 new homes per year, based on the government's standard methodology and the methodology set out in the Housing Background Paper.

Compared to the GMSF 2019, Oldham's housing need, as set out in the GMSF 2020, has been reduced from 106% of our LHN to 100% of our LHN. This is to ensure Oldham meets its local housing need, whilst protecting as much Green Belt land as possible.

The 2020 allocation states that development will be required to provide a range of dwelling types and sizes, to deliver more inclusive neighbourhoods and meet local needs, including the delivery of high-quality family housing. It is considered the site has the potential to meet local housing need in the immediate vicinity and across the borough and contribute to, and enhance, the housing mix within the area, through adding to the type and range of housing available.

In the 2020 GMSF, Chapter 7 'Homes for Greater Manchester' and Policy GM- H2 sets out the approach to affordable housing across GM and supports the provision of affordable housing, either on or off-site, as part of new development, with locally appropriate requirements being set by each local authority. The 2020 allocation policy states that development will be required to provide for affordable homes in line with local planning policy requirements. A Housing Strategy and Local Housing Needs Assessment has been prepared by Oldham Council which will inform Local Plan affordable housing policy.

Policy GM-E1 Sustainable Places sets out a series of criteria relating to design and the delivery of the attractive places that new development will need to have regard to, including:

- Durable, being built to last and using robust materials that reflect local character, weather well and are easily maintained; and
- Resource-efficient with:
  - A. A low carbon footprint;
  - B. Efficient use of land;
  - C. Minimised use of new materials;
  - D. High levels of recycling.

It also requires new development to be supported by critical infrastructure, such as energy, water and drainage and green spaces.

### **Green Belt:**

A Green Belt Harm Assessment has been carried out to inform preparation of the GMSF. The case for exceptional circumstances relating to Land South of Coal Pit Lane (Ashton Road) will be set out in the allocation's topic paper.

There has been a significant reduction in proposed Green Belt release within Oldham, with approximately 50% less Green Belt proposed for release in GMSF 2020 compared to GMSF 2019. The GMSF 2019 released 363.7ha of Green Belt. GMSF 2020 proposes to release around 188ha of Green Belt.

In terms of Land South of Coal Pit Lane (Ashton Road), a large proportion of land within the site boundary will be retained as green infrastructure/ open space.

### **Brownfield:**

Since the GMSF 2019, Oldham Council has carried out a comprehensive and robust review of the borough's housing land supply, significantly increasing the housing land supply within the urban area. This includes emerging findings from our draft Mill Strategy, the recently completed Retail and Leisure Study and the council's aspiration for Oldham Town Centre as part of Creating a Better Place. The current housing land supply position will be available as part of the evidence to support GMSF 2020.

The GMSF adopts a 'brownfield preference' policy and sets out how we (the GMCA and the ten GM districts) will do all that we can to make sure that our brownfield sites comes forward in the early part of the plan period. To do this we need to continue to press Government for support to remediate contaminated land, to provide funding for infrastructure and to support alternative models of housing delivery. However, this additional housing land identified is still not enough to meet our local housing need. Therefore, whilst we understand the significant concerns the local community has expressed in the previous consultations regarding the proposed strategic allocations there is still a need to release land from the Green Belt for future development.

### **Transport – Highways / Public Transport / Cycling / Walking:**

Transport for Greater Manchester (TfGM) appointed consultants to undertake locality assessments for each of the proposed strategic allocations. The locality assessments have considered access to the site and identified mitigation measures needed to minimise the impact of the proposed development on the local highway network, the strategic highway network (where appropriate), and multi-modal access (including public transport, cycling and walking). As part of identifying necessary local highway mitigation measures consideration has been to the cumulative impact of this site and other proposed strategic allocations within the area as appropriate.

The modelling used in the assessments is a 'worst case' scenario as it does not take full account of the extensive opportunities for active travel and public transport improvements in the local area. The site allocation access arrangements have been developed to illustrate that there is a practical option for site allocation access in this location and to develop indicative cost estimations. Detailed design's consistent with Greater Manchester's best practice Streets for All highway design principles will be required at planning application stage.

The 2020 allocation policy sets out that development of the site will be required to:

- Provide for appropriate access points to and from the site, in liaison with the local highway authority. As part of this, provision should be made to safeguard a route from the north western edge of the site through to Coal Pit Lane, linked to the internal road infrastructure of the site; and
- Take account of and deliver any other highway improvements that may be needed, so as to minimise the impact of associated traffic on the surrounding areas and roads, including off-site highways improvements, high-quality walking and cycling infrastructure and public transport facilities such as waiting facilities at bus stops near the site.

The site is well positioned, in a sustainable and accessible location and with good connectivity to the wider strategic highway network. The site has good access to public



transport and a range of local services, with access to bus routes along Ashton Road between Tameside and Oldham. TfGM have also identified the A627/A671 corridor between Rochdale – Oldham – Ashton within the first tranche of the ‘Streets for All’ corridor studies to improve connectivity on Greater Manchester’s Key Route Network. These corridors have been identified for their potential to support a range of GM agendas, around delivering modal shift (particularly to public transport, walking and cycling), improving air quality and regenerating local centres. Any development would therefore be required to enhance links to and from the site to the bus network, to encourage sustainable modes of travels and maximise the site’s accessibility, developing, building on the existing recreation routes and Public Right of Way network.

**Physical infrastructure and utilities:**

Policy GM E1 Sustainable Places sets out a series of criteria relating to design and the delivery of the attractive places, including a requirement that new development be supported by critical infrastructure, such as energy, water and drainage and green spaces.

**Social Infrastructure:**

It is important to ensure that any development proposed does not place undue pressure on existing social infrastructure and takes account of the increased demand it may place on existing provision. The 2020 allocation policy therefore outlines that as part of the development, developers will be required to contribute to additional school places, and appropriate health facilities and community facilities, where appropriate and in liaison with the local authority.

In addition to the requirements set out in the 2020 allocation policy:

- Policy GM-E 5 Education of the 2020 GMSF states that significant enhancements in education, skills and knowledge will be promoted throughout Greater Manchester by enabling the delivery of new and improved education, skills and knowledge for all ages and the delivery of sufficient school places to respond to the demands from new housing.
- Policy GM–E 6 Health of the 2020 GMSF states that new development will be required to maximise its positive contribution to health and well-being through the submission of Health Impact Assessments for all development proposals which require an Environmental Impact Assessment. Improvements in health facilities will be supported, by requiring, where appropriate, the provision of new or improved health facilities as part of new developments that would significantly increase demand.

**Environmental – Green Infrastructure, Biodiversity, open space:**

A Preliminary Ecological Appraisal has been carried out by Greater Manchester Ecology Unit for this site to inform the GMSF. The appraisal identifies ecological features onsite, the extent to which development of the site would impact on these features, and the mitigation required. This has informed the allocation policy.

The 2020 allocation policy sets out that development of the site is required to:

- Deliver multi-functional green infrastructure (incorporating the retention and enhancement of existing public rights of way) and high-quality landscaping within the site so as to minimise the visual impact on the wider landscape, mitigate its

environmental impacts, enhance linkages with the neighbouring communities and countryside and provide opportunities for leisure and recreation;

- Have regard to the recommendations of the Greater Manchester Landscape Character and Sensitivity Assessment for the Incised Urban Fringe Valleys;
- Retain and enhance the hierarchy of biodiversity within the site, notably areas of priority habitats, following the mitigation hierarchy and deliver a meaningful and measurable net gain in biodiversity, integrating them as part of multi-functional green infrastructure network;
- Provide further surveys on amphibians, extended phase 1 habitats, badgers and bats to inform any planning application; and
- Contribute towards green infrastructure enhancement opportunities in the surrounding Green Belt, as identified in the Identification of Opportunities to Enhance the Beneficial Use of the Green Belt assessment.

The 2020 allocation policy also states that development of the site will be required to provide for new and/or improvement of existing open space, sport and recreation facilities commensurate with the demand generated and local surplus' and deficiencies, in line with local planning policy requirements.

#### **Air Quality:**

Air Quality is covered by Policy GM-S 6 Clean Air in the 2020 GMSF, which sets out a range of measures to support air quality. Government has directed Greater Manchester to produce a Clean Air Plan. The ten districts have chosen to do this collectively. In March 2019 the GM Authorities determined the best performing option to reduce NO<sub>2</sub> across GM and agreed the submission of the Outline Business Case (OBC) to Government. A public consultation on the draft Clean Air Plan will be carried out in October/November 2020.

#### **Flood Risk:**

A Level 1 Strategic Flood Risk Assessment has been carried out to inform the GMSF and the proposed strategic allocations, including Land south of Coal Pit Lane (Ashton Road). The SFRA mapped the allocation's flood risk, identified mitigation measures that may be appropriate and informed the allocation policy wording.

The 2020 allocation policy sets out that development of the allocation should be informed by an appropriate flood risk assessment, feeding in a comprehensive drainage strategy for the whole site. Development should deliver any appropriate recommendations, including mitigation measures and the incorporation of sustainable drainage systems, integrated as part of the multi-functional green infrastructure network. Opportunities to use natural flood management and highway SUD's schemes should be explored.

#### **Heritage:**

Oldham Council has prepared a Heritage Impact Assessment (HIA) for each of its strategic allocations to inform the GMSF. The outputs of which have informed the policy wording for this allocation. The 2020 allocation policy states that development will be required to conserve and enhance heritage assets and their setting, in accordance with the findings and recommendations of the Historic Environment Assessment (2020). An up-to-date Heritage Impact Assessment will be required for any planning applications.

**Landfill/ contamination:**

The 2020 allocation policy has been amended to require any development to incorporate necessary remediation measures in areas which are affected by contamination and have been previously worked for landfill purposes.

**Other:**

Consultation on the 2019 GMSF was an informal consultation. As such, the GMCA has fulfilled its objectives to consultation. The ten authorities of Greater Manchester carried out consultation in line with their requirements as set out in their district's Statement of Community Involvement (SCI). Oldham has fulfilled its commitments as set out within its SCI. The full 2019 consultation report is available at [www.greatermanchester-ca.gov.uk/what-we-do/housing/greater-manchester-spatial-framework](http://www.greatermanchester-ca.gov.uk/what-we-do/housing/greater-manchester-spatial-framework).

Please see GMSF 2020 for the full allocation policy wording and reasoned justification.

**GM Allocation 14: Beal Valley (1,491 comments)**

It was felt that the surrounding highway network does not have the capacity to take the volume of traffic generated by the proposed development which would increase pollution and congestion in the area and there is no evidence, or clear indication of how or who would fund such a road.

Site access was felt to be poor or dangerous and public transport infrastructure was also cited as being poor with Metrolink often used as an example of already being currently overcrowded. There was also criticism of the lack of detail regarding infrastructure required to support the development, particularly health and education provision which is already at capacity and a lack of leisure and community facilities within the area, since closure of the local swimming pool.

With regards to housing it was highlighted that the housing being put forward by developers is 3/4 & 5 bed-roomed houses which will not be the affordable/social homes that the community needs.

Other issues highlighted include the visual impact of development and loss of Green Belt and green infrastructure and in particular the existing public rights of way needs to be retained. There was also concern over the impact on wildlife habitats and biodiversity and particularly the SBI at Shawside.

Constraints of the site were highlighted in relation to land fill, mine shafts and topography as well as development at this scale contributing to a greater flood risk as this area is the River Beal flood plain. Recent flooding demonstrates that site is not suitable for development

<b>Principle / scale of development</b>
<ul style="list-style-type: none"> <li>• 480 homes are too many for the population, site area and surrounding infrastructure.</li> <li>• Should use more land to the east of the borough with a M62 junction, A-roads, rail station, village centres and a new secondary school.</li> </ul>
<b>Housing (inc affordable housing)</b>
<ul style="list-style-type: none"> <li>• No need for housing in this area. Not wanted.</li> <li>• Will not provide affordable homes for local people.</li> <li>• Local housing need methodology needs revisiting. Should use ONS 2018 figures. Housing numbers are guidelines rather than targets.</li> <li>• It is not fixed. 20 years is a long time for a plan period and the shortfall in the Strategic Housing Land Availability Assessment only occurs if you treat it as a fixed supply.</li> <li>• The Greater Manchester Spatial Framework (GMSF) has engineered a housing shortfall.</li> <li>• The site can deliver between 580 and 670 dwellings.</li> <li>• Disappointing that housing targets and allocations have reduced. Will make meeting GMSF aspirations more difficult. Housing growth does not include growth from outside the Greater Manchester area.</li> <li>• We should promote family housing in suburban areas. This requires more release of Green Belt and OPOL. Smaller sites can provide housing, commercial open space and other community facilities.</li> </ul>
<b>Employment and Economy</b>
<ul style="list-style-type: none"> <li>• Council Tax revenue is not a reason to develop Greenfield land.</li> <li>• Empty commercial properties are available.</li> <li>• Development will support the town centre.</li> </ul>

<b>Green Belt</b>
<ul style="list-style-type: none"> <li>• Proposed green belt loss heavily weighted in Shaw and Crompton area.</li> <li>• 75% of Oldham’s Green Belt loss will be in Royton, Shaw, Crompton, and Chadderton North.</li> <li>• Royton, Shaw, and Crompton will also lose 59 hectares of other protected open land (OPOL).</li> <li>• Disagree with the release of Green Belt land.</li> <li>• Proposals will result in the visual loss of countryside.</li> <li>• Plans show no desire to improve green space. Will disadvantage local people and reduce quality of life.</li> <li>• Proposals will merge Rochdale and Oldham.</li> <li>• No exceptional circumstances.</li> <li>• Should remain for open space / parkland.</li> <li>• Affordable housing should not be at the cost of the green belt. Few people will benefit.</li> <li>• Question regarding why land that will not be developed has been taken out of the Green Belt / OPOL.</li> </ul>
<b>Brownfield</b>
<ul style="list-style-type: none"> <li>• Need to focus on urban regeneration and deprived communities.</li> <li>• Brownfield sites need to be utilised first.</li> <li>• Town Centres need to be revitalised.</li> <li>• There is a large amount of unoccupied housing.</li> <li>• Re-order industrial land to free up spaces for houses.</li> <li>• The Call for Sites process has not been promoted enough.</li> <li>• Government funding is required to remediate sites.</li> </ul>
<b>Transport – Highways / Public Transport / Cycling / Walking</b>
<ul style="list-style-type: none"> <li>• Congestion is already an issue.</li> <li>• The scale of development is of a concern from cumulative traffic impact perspective due to close geographic proximity of other proposed allocated development sites in the immediate local area.</li> <li>• Concerned about traffic when cricket matches are on.</li> <li>• Road surfaces are poor with existing traffic levels.</li> <li>• Proposals will lead to increased road traffic accidents.</li> <li>• A663 / Oldham Road is dangerous.</li> <li>• Request for traffic and transport impact assessments.</li> <li>• Sumner Street is narrow.</li> <li>• Access from Oldham Road (opposite the Marches) looks impractical.</li> <li>• Access from Oldham Road is a good idea.</li> <li>• Road infrastructure needs bringing up to modern standards.</li> <li>• Proposed link road to Beal Lane will result in loss of car parking spaces at the Metrolink.</li> <li>• Proposed junction on Bullcote Lane and Bullcote Green is unpractical and dangerous. Children play on Bullcote Green estate. Junction includes an accident blind spot.</li> <li>• Concept plan does not show where the access road continues. Plans are not detailed enough.</li> <li>• Dangerous access to and from Manchester Road.</li> <li>• B6194 Water Street – Bullcote Lane cannot be improved without loss of public houses, which are part of the social infrastructure.</li> <li>• Spine road will come out onto Shaw Road, which is busy.</li> <li>• Question how the new access road will be funded. Land is uneven, will be expensive and would involve cutting into the landscape.</li> <li>• Concerned new car park will result in additional noise, traffic, pollution and lighting at the cricket club.</li> </ul>

- Oppose additional Metrolink stops as they will make the journey time longer for those living further north of the proposed Metrolink stop. Question regarding who will pay for the new stop and associated infrastructure.
- Policy should be amended to say that land would be safeguarded for a potential Metrolink stop. Suggested text provided.
- Access to the Metrolink stop would be via a B road, which is unfit for traffic.
- Remote location of the Metrolink stop is a concern given issues with anti-social behaviour on the Oldham/ Rochdale line.
- We need compulsory school buses and walking to school, reduced travel fares to work etc.
- People from Saddleworth also travel to Shaw Metrolink park and ride- increasing the pressure on infrastructure. Parking is inadequate.

#### **Physical Infrastructure and utilities**

- Roads will need to be dug up for power, internet and sewerage systems.
- Waste disposal facilities are inadequate.
- Electricity, water supply, drainage and sewer systems are from the 19<sup>th</sup> century and at full capacity.
- Construction phases are commencing at the wrong end of the development – the houses will be built before the infrastructure.

#### **Social Infrastructure**

- There is a lack of health centres.
- Proposed development would add strain on schools, which are oversubscribed. Some schools are performing poor, additional housing will add to this issue.
- Need facilities like swimming pools and sports facilities.
- New medical facilities and dentists, social care, accessible food shops are required.
- Currently wait weeks for a doctor's appointment.
- Oldham hospital is struggling, as Rochdale Infirmary does not offer x-ray facilities.
- Proposed development would add to policing and fire service demands.
- Not considered cumulative adverse effect of sites proposed.

#### **Environmental – Green Infrastructure, Biodiversity, open space**

- Proposed development would ruin views and natural beauty of the countryside. Cannot minimise views of 480 homes.
- Green space compensates for the industrial town of Shaw.
- Proposed development have a negative impact on wildlife and habitats. Species mentioned, including the SBI site. Comment that there are over 1000 species, including priority species. Need sufficient land for feeding and green corridors.
- Request for up to date ecological assessments.
- Question regarding how biodiversity net gain can be achieved.
- Biodiversity net gain can be applied to green infrastructure, deciduous woodland, lowland fen and protected species. The development of Beal Valley and Broadbent Moss should include partnership work to ensure a wider ecological network approach.
- Development will not enhance green infrastructure and biodiversity.
- Local people cherish green space, as it is accessible without the need to travel for walkers, dog walkers, horse riders etc.
- The proposals would affect health and well-being. Oldham has mental health and child obesity issues.
- There is a link between accessibility of the countryside and the rise in economic competitiveness. .
- Footpaths and hedge lines and buffers around water courses should be retained
- There is Japanese knotweed on site.

<p><b>Air Quality</b></p> <ul style="list-style-type: none"> <li>• Air pollution is already at dangerous levels. Increased air pollution increases the risk of miscarriages and asthma. Schoolchildren are vulnerable.</li> <li>• There is a need to tackle climate change.</li> <li>• Air Quality Impact Assessments should be released.</li> <li>• Need environmentally friendly housing.</li> </ul>
<p><b>Flood risk</b></p> <ul style="list-style-type: none"> <li>• Drainage issues are caused by Metrolink tracks.</li> <li>• The site is located in a flood plain. Development will cause greater flood risk.</li> <li>• There should be independent flood risk assessments.</li> <li>• Recommend enhancing the River Beal as part of the overall site strategy.</li> <li>• Recommend taking a strategic approach to flood risk management and provide opportunities for upstream storage.</li> <li>• Opportunity to use Sustainable Urban Drainage Systems following the site's hydrology to create a network of wetlands that incorporate fen, pond and watercourses.</li> </ul>
<p><b>Heritage</b></p> <ul style="list-style-type: none"> <li>• The proposals would affect character, farmland and weavers' cottages.</li> <li>• Concern that development will be out of character with heritage assets and their settings.</li> </ul>
<p><b>Other</b></p> <ul style="list-style-type: none"> <li>• Increased traffic will increase noise pollution.</li> <li>• Oppose development next to the cricket club.</li> <li>• Planners have avoided Saddleworth to avoid objections.</li> <li>• The site has past use as a landfill site.</li> <li>• There is a disused mineshaft on site.</li> <li>• Many residents do not use the internet, consultation questions are loaded, and people found out by word of mouth.</li> <li>• Over 4000 people at demonstration, which demonstrates feelings against GMSF.</li> <li>• Support from landowners.</li> </ul>
<p><b>Response to Comments</b></p> <p><b>Principle / scale of development:</b></p> <p>The site selection paper identifies that Beal Valley meets site selection criteria:</p> <ul style="list-style-type: none"> <li>• <b>Criterion 1</b> - as part of the site is within the 800m buffer of the Shaw and Crompton Metrolink Stop;</li> <li>• <b>Criterion 5</b> - as the north part of the site falls within a most deprived area;</li> <li>• <b>Criterion 6</b> as the site will contribute to the delivery of a new Metrolink stop and Park &amp; Ride facility which will provide sustainable transport provision for the wider community; and</li> <li>• <b>Criterion 7</b> - as the proposed spine road, running north to south, and the proposed new Metrolink stop and Park &amp; Ride facility, has the potential to address existing traffic congestion issues in the area and improve public transport connectivity.</li> </ul> <p>In terms of the GMSF Spatial Strategy and Strategic Objectives, Beal Valley is capable of delivering around 480 houses, with a mix of dwelling types and sizes to deliver more inclusive neighbourhoods and meet local needs. As such the allocation contributes to the spatial objective of boosting Northern Competitiveness, within the boroughs of Bolton,</p>

Bury, Oldham, Rochdale, Tameside, Wigan and west Salford, through contributing to meeting the housing need across Oldham.

**Housing (incl. affordable housing):**

The housing methodology is covered in the Housing Background Paper.

The Housing Background Paper sets out Greater Manchester's Housing Need, including how each district will meet their own housing need and the collective need of GM. It sets out the proposed methodology for meeting this need across the 10 districts and how this is intended to be delivered in line with the objectives of the plan as a whole. Oldham's current Local Housing Need (LHN) based on the government's standard methodology is for 692 new homes per year. The GMSF sets out a proposed housing requirement for Oldham of 693 new homes per year, based on the government's standard methodology and the methodology set out in the Housing Background Paper.

Compared to the GMSF 2019, Oldham's housing need, as set out in the GMSF 2020, has been reduced from 106% of our LHN to 100% of our LHN. This is to ensure Oldham meets its local housing need, whilst protecting as much Green Belt land as possible.

The 2020 allocation policy states that development will be required to provide a range of dwelling types and sizes so as to deliver inclusive neighbourhoods and meet local needs, including the delivery of high-quality family housing. It is considered the site has the potential to meet local housing need in the immediate vicinity and across the borough and contribute to and enhance the housing mix within the area through adding to the type and range of housing available.

Chapter 7 'Homes for Greater Manchester' and Policy GM- H2 sets out the approach to affordable housing across GM and supports the provision of affordable housing, either on or off-site, as part of new development, with locally appropriate requirements being set by each local authority. The 2020 allocation policy states that development will be required to provide for affordable homes in line with local planning policy requirements. A Housing Strategy and Local Housing Needs Assessment has been prepared by Oldham Council which will inform Local Plan affordable housing policy.

**Employment:**

There are a number vacant and / or under-utilised employment sites included in Oldham's baseline housing land supply, which have been identified as having potential for residential development at some point in the future. Many of these are active employment sites or sites last used for employment purposes, such as Hartford Mill and Maple Mill. The current housing land supply position will be available as part of the evidence to support GMSF 2020.

**Green Belt:**

A Green Belt Harm Assessment has been carried out to inform preparation of the GMSF. The case for exceptional circumstances relating to Beal Valley will be set out in the allocation's topic paper.

There has been a significant reduction in proposed Green Belt release within Oldham, with approximately 50% less Green Belt proposed for release in GMSF 2020 compared to GMSF 2019. The GMSF 2019 released 363.7ha of Green Belt. GMSF 2020 proposes to release around 188ha of Green Belt.



The 2020 allocation policy states that development will be required to ensure the protection of a large green wedge, between the main development area and the Metrolink line to the east, from development and its enhancement as part of the multi-function green infrastructure network and contribute towards green infrastructure enhancement opportunities in the surrounding Green Belt as identified in the Identification of Opportunities to Enhance the Beneficial Use of the Green Belt assessment.

**Brownfield:**

Since the Draft Plan 2019, Oldham Council has carried out a comprehensive and robust review of the borough's housing land supply, significantly increasing the housing land supply within the urban area. This including emerging findings from our draft Mill Strategy, recently complete Retail and Leisure Study and the council's aspiration for Oldham Town Centre as part of Creating a Better Place. The current housing land supply position will be available as part of the evidence to support GMSF 2020.

The GMSF adopts a 'brownfield preference' policy and sets out how we (the GMCA and the ten GM districts) will do all that we can to make sure that our brownfield sites comes forward in the early part of the plan period. To do this we need to continue to press Government for support to remediate contaminated land, to provide funding for infrastructure and to support alternative models of housing delivery. However, this additional housing land identified is still not enough to meet our local housing need. Therefore, whilst we understand the significant concerns the local community has expressed in the previous consultations regarding the proposed strategic allocations there is still a need to release land from the Green Belt for future development.

**Transport – Highways / Public Transport / Cycling / Walking:**

Transport for Greater Manchester (TfGM) appointed consultants to undertake locality assessments for each of the proposed strategic allocations. The locality assessments have considered access to the site and identified mitigation measures needed to minimise the impact of the proposed development on the local highway network, the strategic highway network (where appropriate), and multi-modal access (including public transport, cycling and walking). As part of identifying necessary local highway mitigation measures consideration has been to the cumulative impact of this site and other proposed strategic allocations within the area as appropriate.

The modelling used in the assessments is a 'worst case' scenario as it does not take full account of the extensive opportunities for active travel and public transport improvements in the local area. The site allocation access arrangements have been developed to illustrate that there is a practical option for site allocation access in this location and to develop indicative cost estimations. Detailed design's consistent with Greater Manchester's best practice Streets for All highway design principles will be required at planning application stage.

The 2020 allocation policy sets out that development of the site will be required to:

- Provide for appropriate access points to and from the site in liaison with the local highway authority, linking to a new internal spine road that will connect the site to the Broadbent Moss allocation to the south and be delivered as part of the

comprehensive development of both sites. The reasoned justification provides further details regarding appropriate site access points;

- Safeguard a route for the proposed spine road, through the northern part of the site, to offer the potential to link the site to Shaw Town Centre and further improve connectivity to the local area and beyond;
- Take account of and deliver any other highway improvements, that may be needed to minimise the impact of associated traffic on the local highway network and improve accessibility to the surrounding area, including off-site highway improvements, high-quality walking and cycling infrastructure and public transport facilities;
- Contribute towards the delivery of the new Metrolink stop and new park and ride facility as part of the neighbouring Broadbent Moss allocation, which in part will help to serve and improve the accessibility and connectivity of both allocations; and
- Enhance pedestrian and cycling links to and from the site to the Shaw Metrolink stop, the new Metrolink stop proposed as part of the Broadbent Moss strategic allocation, the bus network and surrounding area, to encourage sustainable modes of travel and maximise the sites accessibility, building on the existing recreation routes and public rights of way network (as part of a multi-functional green infrastructure network).

The TFGM 2040 plan sets out the strategy for future improvements to Greater Manchester's transport network, including proposed Metrolink expansion and improvements.

#### **Physical Infrastructure:**

Policy GM E1 Sustainable Places of the 2020 GMSF sets out a series of criteria relation to design and the delivery of the attractive places, including a requirement that new development to be supported by critical infrastructure, such as energy, water and drainage and green spaces.

#### **Social Infrastructure:**

It is important to ensure that any development proposed does not place undue pressure on existing social infrastructure and takes account of the increased demand it may place on existing provision. The 2020 allocation policy therefore outlines that as part of the development, developers will be required to contribute to additional school places, and appropriate health facilities and community facilities, where appropriate and in liaison with the local authority.

In addition to the requirements set out in the 2020 allocation policy:

- Policy GM-E 5 Education of the 2020 GMSF states that significant enhancements in education, skills and knowledge will be promoted throughout Greater Manchester by enabling the delivery of new and improved education, skills and knowledge for all ages and the delivery of sufficient school places to respond to the demands from new housing.

- Policy GM–E 6 Health of the 2020 GMSF states that new development will be required to maximise its positive contribution to health and well-being through the submission of Health Impact Assessments for all development proposals which require an Environmental Impact Assessment. Improvements in health facilities will be supported, by requiring, where appropriate, the provision of new or improved health facilities as part of new developments that would significantly increase demand.

#### **Environmental – Green Infrastructure, Biodiversity, open space:**

A Preliminary Ecological Appraisal has been carried out by Greater Manchester Ecology Unit for this site to inform the GMSF. The appraisal identifies ecological features onsite, the extent to which development of the site would impact on these features, and the mitigation required. This has informed the allocation policy.

The 2020 allocation policy sets out that development of the site is required to:

- Ensure the protection of a large green wedge, from development and its enhancement as of part of the multi-function green infrastructure network and contribute towards green infrastructure enhancement opportunities in the surrounding Green Belt as identified in the Identification of Opportunities to Enhance the Beneficial Use of the Green Belt assessment;
- Retain and enhance the hierarchy of biodiversity within the site, notably the existing Shawside SBI, including areas of priority habitats and the Twingates local nature reserve, following the mitigation hierarchy and deliver a meaningful and measurable net gain in biodiversity;
- Provide further surveys on phase 1 habitats, to inform any planning application and have regard to the river course and broadleaved woodland; and
- Protect and enhance the habitats and corridor along the River Beal to improve the existing water quality and seek to achieve ‘good’ as proposed under the EU Water Framework Directive.

In relation to open space, sport and recreation Policy GM Allocation 12 states that development of the site will be required to provide for new and/or improvement of existing open space, sport and recreation facilities commensurate with the demand generated and local surplus’ and deficiencies, in line with local planning policy requirements. Including the expansion of, and improvement to existing, facilities at Heyside Cricket Club.

#### **Air Quality:**

Air Quality is covered by Policy GM-S 6 Clean Air which sets out a range of measures to support air quality. Government has directed Greater Manchester to produce a Clean Air Plan. The ten districts have chosen to do this collectively. In March 2019 the GM Authorities determined the best performing option to reduce NO<sub>2</sub> across GM and agreed the submission of the Outline Business Case (OBC) to Government. A public consultation on the draft Clean Air Plan will be carried out in October/November 2020.

#### **Flood Risk:**

A Level 1 Strategic Flood Risk Assessment has been carried out to inform the GMSF and the proposed strategic allocations, including Beal Valley. The SFRA mapped the

allocation's flood risk, identified mitigation measures that may be appropriate and informed the allocation policy wording.

The 2020 allocation policy sets out that development of the allocation should be informed by an appropriate flood risk assessment, feeding in a comprehensive drainage strategy for the whole site. Development should deliver any appropriate recommendations, including mitigation measures and the incorporation of sustainable drainage systems, integrated as part of the multi-functional green infrastructure network. Opportunities to use natural flood management and highway SUD's schemes should be explored.

Furthermore, the 2020 allocation policy sets out that development of the site should also 'include provision for a wetland catchment area, in liaison with the Environment Agency, the Local Lead Flood Authority and Greater Manchester Ecology Unit, to the south east of the site within the Flood Zone 3, to provide net gains in flood storage for the wider catchment and / or actively reduce flood risk impacts downstream through additional storage, integrating it with the wider multi-functional green infrastructure network and incorporating sustainable drainage infrastructure'.

Finally, the 2020 allocation policy sets out that development of the site should have regard to the Groundwater Source Protection Zone in the design of the development to ensure there are no adverse impacts to groundwater resources or groundwater quality, and to ensure compliance with the Environment Agency's approach to groundwater protection and any relevant position statements.

**Heritage:**

Oldham Council has prepared a Heritage Impact Assessment (HIA) for each of its strategic allocations to inform the GMSF. The outputs of which have informed the policy wording for this allocation. The 2020 allocation policy sets out that development of the site will be required to identify any designated and non-designated heritage assets and assess the potential impact on the asset and their setting, when bringing forward the proposals, through further Heritage Impact Assessments.

Harm to the significance of Birshaw House and New Bank will need to be mitigated through a landscape buffer between the asset and all the development plots and access road. An appropriate landscaping scheme should be implemented on the edge of the development plots.

**Landfill/ contamination:**

The 2020 allocation policy has been amended to include reference of the site's landfill history and that development of the site is required to incorporate necessary remediation measures in areas affected by contamination and previously worked for landfill purposes.

**Other:**

Consultation on the 2019 GMSF was an informal consultation. As such, the GMCA has fulfilled its objectives to consultation. The ten authorities of Greater Manchester carried out consultation in line with their requirements as set out in their district's Statement of Community Involvement (SCI). Oldham has fulfilled its commitments as set out within its SCI. The full 2019 consultation report is available at [www.greatermanchester-ca.gov.uk/what-we-do/housing/greater-manchester-spatial-framework](http://www.greatermanchester-ca.gov.uk/what-we-do/housing/greater-manchester-spatial-framework).

Please see GMSF 2020 for the full allocation policy wording and reasoned justification.



**GM Allocation 15: Broadbent Moss (146 comments)**

The scale of development and its proximity to proposed development at Beal Valley means over 2,000 new homes are proposed in this area. There was general feeling that the plans are too big too fast. There was a suggestion that the Beal Valley and Broadbent Moss sites should be considered as one.

There was concern with highways with surrounding roads already suffering from congestion and in particular with regards to the access points. With regards to public transport it was felt that an additional Metrolink stop will not solve the congestion issues. Current transport links are also inadequate and do not have sufficient parking to entice park and ride on public transport.

Noise and air pollution was also a major concern as well as the provision of more social infrastructure such as schools. The loss of open space, ecology and recreational value of the area was also highlighted

Development constraints of the site were highlighted as it being a land fill site as well as concerns over flooding and drainage.

<b>Principle / scale of development</b>
<ul style="list-style-type: none"> <li>• The combined Cowlshaw, Beal Valley, Broadbent Moss and Alderney Farm proposals there will be nearly 2,500 new homes. The existing road network could not cope with this level of traffic.</li> <li>• Promoting industry should be the ambition but scale of development and impact on roads will put businesses off.</li> <li>• This spatial distribution is unfair.</li> <li>• The plan focuses too much on Royton, Shaw and Slattocks.</li> <li>• Not a separate site to Beal Valley, the two should be considered linked.</li> <li>• Fundamental flaw in the rationale which has resulted in a concentration of Green Belt and OPOL allocations all in the same vicinity in the North West quarter of Oldham with no regard to their cumulative adverse effects. Even if some Green Belt allocations are justifiable next to the motorways and Metrolink, we should not compound the problem with extra allocations in their midst.</li> </ul>
<b>Housing (inc affordable housing)</b>
<ul style="list-style-type: none"> <li>• The requirement is based on wrong and inaccurate Office for National Statistics figures.</li> <li>• Unable to see why such an amount of housing is required in Oldham compared with other areas in Greater Manchester.</li> <li>• Most of the proposed housing will not be affordable.</li> <li>• Residents of Greater Manchester are being lied to, to try to get us to accept a irreparable destruction of green space in suburbs and the countryside.</li> <li>• House prices are high due to mass immigration, destruction of stable family life, right to buy and inflation.</li> <li>• If only 878 houses can be delivered during this plan period, why are 1,450 homes proposed? The additional land should be released at a later point.</li> <li>• A different type of affordable housing is required here than in Saddleworth.</li> <li>• The principle of housing is a good idea.</li> <li>• A large percentage of unoccupied housing in the borough.</li> <li>• The result will be that the developers will make a lot of money, house prices will stay high and Greater Manchester will merge.</li> <li>• We need more affordable environmentally friendly housing.</li> <li>• There are flaws in Oldham’s Strategic Housing Land Availability Assessment.</li> </ul>

<p><b>Employment and Economy</b></p> <ul style="list-style-type: none"> <li>Proposals would not be able to provide the amount of jobs that residents require.</li> <li>Need to develop a programme for realistic, progressive careers for the residents of Oldham who can work locally in jobs, which are fairly, or well, paid.</li> </ul>
<p><b>Green Belt</b></p> <ul style="list-style-type: none"> <li>Disagree with loss of Green Belt. It should not be built upon.</li> <li>This does not show a desire to improve green space.</li> <li>These proposals will merge distinct areas and eliminate green land between them.</li> <li>It better serves Greater Manchester as a whole, by focusing development on areas that will benefit most and where less Green Belt is destroyed.</li> <li>The loss of Green Belt has not been minimised instead it has increased.</li> <li>There has been a misinterpretation regarding the loss of Green Belt.</li> <li>Once Green Belt has been destroyed, it is gone forever.</li> <li>Despite the claim that the new GMSF has “reduced the net loss of Green Belt by 50%” (1.18), Oldham borough appears to have actually increased its loss of Green Belt, adding a further four sites.</li> <li>Broadbent Moss (together with Beal Valley) will merge the towns of Oldham and Royton joined to create a continuous urban form, which substantially changes the nature of the area.</li> <li>Proposals to increase Green Belt in Saddleworth – should be increasing it in this area to compensate for the losses.</li> <li>Proposals go against the five purposes of Green Belt.</li> <li>There is no evidenced justification for this site to be removed from the Green Belt. There are no exceptional circumstances.</li> </ul>
<p><b>Brownfield</b></p> <ul style="list-style-type: none"> <li>Prioritise Brownfield land for development and invest in more underused buildings and empty homes.</li> <li>Create more opportunities within Oldham Town Centre.</li> <li>It is disappointing that existing low quality industrial land is not identified for redevelopment to residential use.</li> <li>Private developers should be forced to implement planning permissions.</li> <li>The current brownfield sites in Oldham cover 95.5 hectares (oldham.gov.uk – brownfield register March 2018). At the GMSF’s own current projection (pg. 121) of up 70 houses (not apartments or duplexes) per hectare, Oldham has the capacity to develop over 6,600 houses on brownfield alone.</li> </ul>
<p><b>Transport – Highways / Public Transport / Cycling / Walking</b></p> <ul style="list-style-type: none"> <li>The proposals would lead to traffic congestion.</li> <li>The need for improvements to Cop Road to provide link road.</li> <li>Worsen exiting cut throughs (i.e. Buckstead Road from Shaw Road through to Ripponden Road).</li> <li>The proposals would have a negative impact on nearby primary schools and safety of schoolchildren.</li> <li>Concerns about access points (particularly Broadbent Road and Whetstone Road).</li> <li>Concerns about the impact of construction traffic.</li> <li>Access is poor.</li> <li>No access should be considered via Bullcote Lane unless major works/widening of the road takes place prior to building of any housing.</li> <li>Impact on major pinch points in Ripponden Road.</li> <li>The surrounding road network cannot cope of with extra traffic and residents.</li> <li>The proposals will result in increased congestion.</li> <li>Rush hours would be extended; Rochdale road is extremely busy and dangerous at this time.</li> </ul>

- If the Metrolink stop and roads are delivered it will be great, if not the area will be isolated and insular.
- Additional stop will not solve transport issues, as it is already overcrowded.
- The current public transport provision is inadequate and there is insufficient park and ride provision.
- Funding is not yet secure for the Metrolink stop at Cop Road and potential park and ride and an investment case needs to be developed. There are concerns on whether this is feasible.
- There are a lack of parking spaces in this area.
- The scale of development is of a concern from a cumulative traffic impact perspective due to close geographic proximity of other proposed allocated development sites in the immediate local area.

#### **Physical Infrastructure and utilities**

- For the increased number of homes, roads will have to be dug up to provide power, internet and sewage systems.
- How supporting infrastructure will be provided is not adequately explained in the plan.
- The water supply, drainage and sewer systems in Royton are dated and at full capacity.

#### **Social Infrastructure**

- How supporting infrastructure will be provided is not adequately explained in the plan.
- People expect to send their child to a local primary school. This links with walking to school, community, green spaces and many other aspects of the overall plan.
- Proposed development would cause a further strain on schools, which are at capacity.
- There is a lack of information regarding the provision of new social infrastructure with the existing schools and hospitals already at capacity.
- People are unable to get appointments.
- There needs to be more provision of community facilities like swimming pools, library and local shops.

#### **Environmental – Green Infrastructure, Biodiversity, open space**

- This is a use of farmland. It is a valuable wetland site and important ecosystem for wildlife.
- The proposals would lead to a loss of animal habitat.
- We need to look after river valleys.
- The plan will find it difficult to retain and enhance biodiversity, especially since much of the site is being developed on Other Protected Open Land (OPOL) and Green Belt land.
- The proposals would negatively affect Sites of Biological Importance.
- The proposals would lead to a loss of accessible open space used by local residents for informal recreation.
- Important to have sight and access to wide-open green spaces.
- Cycle track laid down in a green space cannot replace pleasure of a real ramble along a country track.
- Green spaces are important for addressing Oldham's mental health and child obesity issues.
- Oldham is a deprived town with many social problems and early death mortality, erasing the green spaces that are free and accessible for all would cause further problems for the borough.
- The Beal Valley and Broadbent Moss allocations provide opportunities to secure net gains for nature.
- Deciduous Woodland is located north of the site east of Shaw Side. Deciduous Woodland is a Priority Habitats listed under Section 41 the NERC Act 2006. It is important that these allocations recognise the National Planning Policy Framework (National Planning Policy Framework) (para 174b).



<p><b>Air Quality</b></p> <ul style="list-style-type: none"> <li>• The proposals will lead to poorer air quality.</li> <li>• The proposals will lead to emissions of greenhouse gases,</li> <li>• The proposals will lead to more light and noise pollution.</li> <li>• Continued failure of Oldham Council to achieve its CO2 target.</li> <li>• The proposals will contradict the Clean Air Plan.</li> </ul>
<p><b>Flood risk</b></p> <ul style="list-style-type: none"> <li>• The area is a floodplain for the River Beal. Development will contribute to large scale flooding of lower lying areas currently drained by the River Beal.</li> <li>• Number of water bodies would be lost which contribute to water catchment.</li> <li>• Recommend that reference be made to the need to protect and enhance the River Beal.</li> <li>• The proposals would lead to localised flooding on Shaw Road and Cop Road. Covering the substrate land with buildings, roads and paths will result in less surface area to absorb future precipitation, resulting in more flooding to residencies and roads at a lower level than the proposed site.</li> <li>• There is an opportunity to use SUDs following the existing site hydrology to create a network of wetlands that enhance and incorporate the existing fen and pond and watercourses within the site.</li> <li>• Protect the hydrology of the Royton Moss Site of Biological Importance.</li> </ul>
<p><b>Heritage</b></p> <ul style="list-style-type: none"> <li>• Broadbent Moss is a huge and prominent expanse of land, which provides an important view from the Ripponden Road. Development would not only spoil this view, but the view as a whole looking over to Oldham and Rochdale, particularly for the people of Highfield Terrace.</li> </ul>
<p><b>Other</b></p> <ul style="list-style-type: none"> <li>• This is a tipping area, which would be unsuitable for housing.</li> <li>• The burden needs to be shared with Saddleworth (opportunities at J22 M62);</li> <li>• There have been empty promises of a golf course here in the past.</li> <li>• Concerns regarding the stability of the land around the employment area.</li> <li>• Concerns regarding the decontamination and remediation due to previous use.</li> </ul>
<p><b>Response to comments:</b></p> <p><b>Principle/ scale of development:</b></p> <p>The site selection paper identifies that Broadbent Moss meets site selection criteria:</p> <ul style="list-style-type: none"> <li>• <b>Criterion 5</b> - as the area is close to an existing area of deprivation in Sholver and development could have a wider regenerative impact;</li> <li>• <b>Criterion 6</b> - as the site will contribute to the delivery of a new Metrolink stop and Park &amp; Ride facility which will provide sustainable transport provision for the wider community; and</li> <li>• <b>Criterion 7</b> - as the proposed spine road, running north to south, and the proposed new Metrolink stop and Park &amp; Ride facility, has the potential to address existing traffic congestion issues in the area and improve public transport connectivity.</li> </ul> <p>In terms of the GMSF Spatial Strategy and Strategic Objectives, Broadbent Moss is capable of delivering around 1,451 houses, with a mix of dwelling types and sizes to deliver more inclusive neighbourhoods and meet local needs. It is anticipated that around 500 of these homes will be delivered post 2037. The site also has the potential to deliver around 21,720sqm of employment floorspace, extending the existing employment opportunities at the Higginshaw Business and Employment Area (BEA). As such the allocation contributes to the spatial objective of boosting Northern Competitiveness, within</p>

the boroughs of Bolton, Bury, Oldham, Rochdale, Tameside, Wigan and west Salford, through contributing to meeting the housing need across Oldham.

**Housing (incl. affordable housing):**

The housing methodology is covered in the Housing Background Paper.

The Housing Background Paper sets out Greater Manchester's Housing Need, including how each district will meet their own housing need and the collective need of GM. It sets out the proposed methodology for meeting this need across the 10 districts and how this is intended to be delivered in line with the objectives of the plan as a whole. Oldham's current Local Housing Need (LHN) based on the government's standard methodology is for 692 new homes per year. The GMSF 2020 sets out a proposed housing requirement for Oldham of 693 new homes per year, based on the government's standard methodology and the methodology set out in the Housing Background Paper.

Compared to the GMSF 2019, Oldham's housing need, as set out in the 2020 plan, has been reduced from 106% of our LHN to 100% of our LHN. This is to ensure Oldham meets its local housing need, whilst protecting as much Green Belt land as possible.

The 2020 allocation policy states that development will be required to provide a range of dwelling types and sizes so as to deliver inclusive neighbourhoods and meet local needs, including a mix of high-quality family housing. The site has the potential to meet local housing need in the immediate vicinity and across the borough and contribute to and enhance the housing mix within the area through adding to the type and range of housing available.

Chapter 7 'Homes for Greater Manchester' and Policy GM- H2 sets out the approach to affordable housing across GM and supports the provision of affordable housing, either on or off-site, as part of new development, with locally appropriate requirements being set by each local authority. The 2020 allocation policy states that development will be required to provide for affordable homes in line with local planning policy requirements. A Housing Strategy and Local Housing Needs Assessment has been prepared by Oldham Council which will inform Local Plan affordable housing policy.

**Economy and employment:**

There are a number vacant and / or under-utilised employment sites included in Oldham's baseline housing land supply, which have been identified as having potential for residential development at some point in the future. Many of these are active employment sites or sites last used for employment purposes, such as Hartford Mill and Maple Mill. The current housing land supply position will be available as part of the evidence to support GMSF 2020.

Chapter 6 'A Prosperous Greater Manchester' of the 2020 GMSF sets out the approach to employment and skills across Greater Manchester, in that the plan will contribute to enhancing the supply of employment opportunities at a variety of skill levels throughout Greater Manchester to achieve more inclusive growth. Policy GM-P 2 sets out that a diverse range of employment sites and premises, both new and second hand, will be made available across Greater Manchester in terms of location, scale, type and cost. This will offer opportunities for all kinds and sizes of businesses, including start-ups, firms seeking to expand, and large-scale inward investment. Broadbent Moss is proposed to deliver 21,720sqm of employment floorspace, extending the existing employment opportunities at the Higginshaw Business and Employment Area (BEA) and contributing to increasing employment opportunities within Oldham.

### **Green Belt:**

A Green Belt Harm Assessment has been carried out to inform preparation of the GMSF. The case for exceptional circumstances relating to Broadbent Moss will be set out in the allocation's topic paper.

There has been a significant reduction in proposed Green Belt release within Oldham, with approximately 50% less Green Belt proposed for release in GMSF 2020 compared to the GMSF 2019. The GMSF 2019 released 363.7ha of Green Belt. GMSF 2020 proposes to release around 188ha of Green Belt.

A large proportion of the Broadbent Moss site is proposed to remain undeveloped and will be retained as Green Belt, providing an opportunity to significantly enhance the green infrastructure and biodiversity value of the site, enhancing the existing assets (such as the priority habitats) and improving access to the open countryside for the local community.

A small portion of land outside the allocation boundary to the south (including Stoneleigh Park) will be removed from the Green Belt to not create a Green Belt 'island' which would not meet Green Belt criteria as a small isolated piece of land. This land will remain protected from development as Green Infrastructure through the Local Plan.

### **Brownfield:**

Since the GMSF 2019, Oldham Council has carried out a comprehensive and robust review of the borough's housing land supply, significantly increasing the housing land supply within the urban area. This including emerging findings from our draft Mill Strategy, the recently completed Retail and Leisure Study and the council's aspiration for Oldham Town Centre as part of Creating a Better Place. The current housing land supply position will be available as part of the evidence to support GMSF 2020.

The GMSF adopts a 'brownfield preference' policy and sets out how we (the GMCA and the ten GM districts) will do all that we can to make sure that our brownfield sites comes forward in the early part of the plan period. To do this we need to continue to press Government for support to remediate contaminated land, to provide funding for infrastructure and to support alternative models of housing delivery. However, this additional housing land identified is still not enough to meet our local housing need. Therefore, whilst we understand the significant concerns the local community has expressed in the previous consultations regarding the proposed strategic allocations there is still a need to release land from the Green Belt for future development.

### **Transport – Highways / Public Transport / Cycling / Walking:**

Transport for Greater Manchester (TfGM) appointed consultants to undertake locality assessments for each of the proposed strategic allocations. The locality assessments have considered access to the site and identified mitigation measures needed to minimise the impact of the proposed development on the local highway network, the strategic highway network (where appropriate), and multi-modal access (including public transport, cycling and walking). As part of identifying necessary local highway mitigation measures consideration has been to the cumulative impact of this site and other proposed strategic allocations within the area as appropriate.

The modelling used in the assessments is a 'worst case' scenario as it does not take full account of the extensive opportunities for active travel and public transport improvements in the local area. The site allocation access arrangements have been developed to

illustrate that there is a practical option for site allocation access in this location and to develop indicative cost estimations. Detailed design's consistent with Greater Manchester's best practice Streets for All highway design principles will be required at planning application stage.

The 2020 allocation policy sets out that development of the site will be required to:

- Provide for appropriate access points to and from the site in liaison with the local highway authority, linking to a new internal spine road that will connect the site to the Beal Valley allocation to the north, and be delivered as part of the comprehensive development of both sites. The spine road will provide a link to the residential area to the east of the Metrolink line, through delivering an appropriate crossing;
- Take account of and deliver any other highway improvements, that may be needed to minimise the impact of associated traffic on the local highway network and improve accessibility to the surrounding area, including off-site highway improvements, high-quality walking and cycling infrastructure and public transport facilities;
- Contribute towards the delivery of a new Metrolink stop and park and ride facility, along with the Beal Valley allocation, which in part will help to serve both allocations and improve their accessibility and connectivity of both allocations; and
- Enhance pedestrian and cycling links to and from the site to the new Metrolink stop, the Beal Valley strategic allocation, bus network and surrounding area, to encourage sustainable modes of travel and maximise the sites accessibility (as part of a multi-functional green infrastructure network).

The TFGM 2040 plan sets out the strategy for future improvements to Greater Manchester's transport network, including proposed Metrolink expansion and improvements.

#### **Physical Infrastructure:**

Policy GM E1 Sustainable Places of the 2020 GMSF sets out a series of criteria relation to design and the delivery of the attractive places, including a requirement that new development to be supported by critical infrastructure, such as energy, water and drainage and green spaces.

#### **Social Infrastructure:**

It is important to ensure that any development proposed does not place undue pressure on existing social infrastructure and takes account of the increased demand it may place on existing provision. The 2020 allocation policy therefore outlines that as part of the development, developers will be required to contribute to additional school places, and appropriate health facilities and community facilities, where appropriate and in liaison with the local authority.

The 2020 allocation policy also requires development of the site to make provision for a local centre adjacent to the new Metrolink stop and new Park & Ride facility on the north western part of the site.

In addition to the requirements set out in the 2020 allocation policy:

- Policy GM-E 5 Education of the 2020 GMSF states that significant enhancements in education, skills and knowledge will be promoted throughout Greater Manchester by enabling the delivery of new and improved education, skills and knowledge for all ages and the delivery of sufficient school places to respond to the demands from new housing.
- Policy GM-E 6 Health of the 2020 GMSF states that new development will be required to maximise its positive contribution to health and well-being through the submission of Health Impact Assessments for all development proposals which require an Environmental Impact Assessment. Improvements in health facilities will be supported, by requiring, where appropriate, the provision of new or improved health facilities as part of new developments that would significantly increase demand.

**Environmental – Green Infrastructure, Biodiversity, open space:**

A Preliminary Ecological Appraisal has been carried out by Greater Manchester Ecology Unit for this site to inform the GMSF. The appraisal identifies ecological features onsite, the extent to which development of the site would impact on these features, and the mitigation required. This has informed the allocation policy.

The 2020 allocation policy sets out that development of the site is required to:

- Retain and enhance areas of biodiversity within the site, most notably the priority habitats, following the mitigation hierarchy, and deliver a meaningful and measurable net gain in biodiversity, integrating them as part of a multi-functional green-infrastructure network with the wider environment;
- Provide further surveys on phase 1 habitats, badgers, amphibians (including great crested newts) and bat surveys to inform any planning application; and
- Protect and enhance the habitats and corridor along the River Beal to improve the existing water quality and seek to achieve 'good' as proposed under the EU Water Framework Directive.

The 2020 allocation policy also states that development of the site will be required to provide for new and/or improvement of existing open space, sport and recreation facilities commensurate with the demand generated and local surplus' and deficiencies, in line with local planning policy requirements. Including the expansion of, and improvement to existing, facilities at Heyside Cricket Club.

**Air Quality:**

Air Quality is covered by Policy GM-S 6 Clean Air of the 2020 GMSF which sets out a range of measures to support air quality. Government has directed Greater Manchester to produce a Clean Air Plan. The ten districts have chosen to do this collectively. In March 2019 the GM Authorities determined the best performing option to reduce NO<sub>2</sub> across GM and agreed the submission of the Outline Business Case (OBC) to Government. A public consultation on the draft Clean Air Plan will be carried out in October/November 2020.

### **Flood Risk:**

A Level 1 Strategic Flood Risk Assessment has been carried out to inform the GMSF and the proposed strategic allocations, including Broadbent Moss. The SFRA mapped the allocation's flood risk, identified mitigation measures that may be appropriate and informed the allocation policy wording.

The 2020 allocation policy sets out that development of the allocation should be informed by an appropriate flood risk assessment, and a comprehensive drainage strategy, which includes a full investigation of the surface water hierarchy. The strategy should include details of full surface water management throughout the site as part of the proposed green and blue infrastructure.

Development must avoid Flood Zone 3b, and deliver any appropriate recommendations, including those within the GMSF Level 2 Site Assessment Summary, ensuring development is safe and does not increase flood risk elsewhere. Natural sustainable drainage systems should be, integrated as part of the multi-functional green infrastructure network and delivered in line with the GM Level 1 Strategic Flood Risk Assessment (SFRA) advice. Opportunities to use natural flood management and highway SUD's features should be explored.

Furthermore, the 2020 allocation policy sets out that development of the site should also 'include provision for a wetland catchment area, in liaison with the Environment Agency, Local Lead Flood Authority and Greater Manchester Ecology Unity, in the northern central part of the site to the south of Cop Road within the Flood Zone 3 area, to provide net gains in flood storage for the wider catchment and / or actively reduce flood risk impacts downstream through additional storage, integrating it with the wider multi-functional green infrastructure network and incorporating SUDs'.

Finally, the 2020 allocation policy sets out that development of the site should have regard to the Groundwater Source Protection Zone in the design of the development, to ensure that there are no adverse impacts to groundwater resources or groundwater quality, and to ensure compliance with the Environment Agency approach to groundwater protection and any relevant position statements.

### **Heritage:**

Oldham Council has prepared a Heritage Impact Assessment (HIA) for each of its strategic allocations to inform the GMSF. The outputs of which have informed the policy wording for this allocation.

The 2020 allocation policy sets out that development of the site will be required to:

- Conserve and enhance heritage assets and their setting in accordance with the findings and recommendations of the Historic Environment Assessment (2020). An up-to-date Heritage Impact Assessment will be required for any planning applications; and
- Take into consideration the findings of the Greater Manchester Historic Environment Assessment Screening Exercise and provide an up-to-date archaeological desk-based assessment to determine if any future evaluation and mitigation will be needed.

**Landfill/ contamination:**

The policy wording has been amended to include reference of the site's landfill history. Policy GM Allocation 14 requires development of the site to incorporate necessary remediation measures in areas affected by contamination and previously worked for landfill purposes.

Please see GMSF 2020 for the full allocation policy wording and reasoned justification.

**GM Allocation 16: Cowlshaw (1,438 comments)**

There is general objection with regards to the proposed access from Denbigh Drive and Cocker Mill Lane especially as traffic congestion is already awful. Public transport was felt to be poor in the area with Metrolink not being accessible and buses being poor. There was concern over the loss of ecology and in particular accessibility for residents to Other Protected Open Land (OPOL). It was highlighted that there were already flooding issues in the area and that the loss of the abattoir is a loss of a very important business regionally

<b>Principle / scale of development</b>
<ul style="list-style-type: none"> <li>• There are too many houses proposed on site based on constraints and wider area.</li> <li>• The area is already over developed.</li> <li>• The area provides a buffer between Royton and Shaw.</li> <li>• The impact on Shaw and Crompton is disproportionate.</li> </ul>
<b>Housing (inc affordable housing)</b>
<ul style="list-style-type: none"> <li>• The proposals should use a lower housing target with realistic economic ambitions. The GMCA has not adequately challenged the Government on this.</li> <li>• Housing target is not accurate and was made prior to Brexit. The Housing Need figure is a guideline, not a target.</li> <li>• Houses will be expensive and not affordable for first time buyers.</li> <li>• Excavation works could affect the stability of existing houses.</li> <li>• Impact of development in terms of overshadowing, privacy and loss of a view of existing residents.</li> <li>• The Call for Sites process identified more suitable sites for housing.</li> <li>• Houses prices will drop because of the proposals.</li> <li>• Additional Council Tax is not a valid reason for allocating Green Belt land for housing.</li> </ul>
<b>Employment and Economy</b>
<ul style="list-style-type: none"> <li>• Loss of the abattoir would remove a source of local employment. Concern about the loss of such an important part of the farming industry.</li> <li>• Would be better to move catalogue industries out of Shaw Centre closer to Junction 21 of M62, which would release land for housing.</li> </ul>
<b>Brownfield</b>
<ul style="list-style-type: none"> <li>• Brownfield land is available for development including empty buildings in Shaw.</li> <li>• We should build affordable homes in Oldham Town Centre and regenerate land in Derker.</li> </ul>
<b>Transport – Highways / Public Transport / Cycling / Walking</b>
<ul style="list-style-type: none"> <li>• There is already too much traffic congestion in this area. There should be an independent traffic and transport assessment.</li> <li>• Additional traffic will add road safety danger for schoolchildren.</li> <li>• The scale of the development is not noted to be of concern from an individual or cumulative traffic impact prospective.</li> <li>• Access arrangements are unsatisfactory.</li> <li>• Some roads are too restricted and could cause difficulties for the emergency services.</li> <li>• Topography makes it difficult to envisage an elegant access solution.</li> <li>• Parking on the estate is already an issue.</li> </ul> <ul style="list-style-type: none"> <li>• Not close to public transport. More people will drive to the Metrolink stop.</li> <li>• Public transport is not safe.</li> <li>• There are a lack of parking facilities at Metrolink stops and it is too expensive.</li> <li>• Additional Metrolink stops will add to overcrowded Metrolink. Residents from Saddleworth use the Metrolink from Shaw.</li> </ul>



<ul style="list-style-type: none"> <li>• Metrolink is not reliable during winter. It requires replacement buses, which add to congestion.</li> <li>• Travelling to Manchester from Shaw for work by bus takes up to an hour and half due to poor services and congestion.</li> <li>• The site is accessible using public right of way and recreational routes. These must be retained.</li> </ul>
<p><b>Physical Infrastructure and utilities</b></p>
<ul style="list-style-type: none"> <li>• Roads will be dug up for utilities.</li> <li>• On site pylon and overhead power lines make the site difficult for development.</li> <li>• Concern expressed about electromagnetic radiation.</li> </ul>
<p><b>Social Infrastructure</b></p>
<ul style="list-style-type: none"> <li>• Waiting times in hospitals are too long and there are not enough places in schools. There is not enough policing and crime levels are too high.</li> <li>• Lack of facilities in Shaw whilst Royton has had new facilities.</li> <li>• No A&amp;E in Rochdale had led to pressure on Oldham Hospital.</li> <li>• The cumulative effect of sites has not been considered.</li> <li>• These proposals could lead to increased waiting times at A&amp;E due to the additional number of houses.</li> </ul>
<p><b>Environmental – Green Infrastructure, Biodiversity, open space</b></p>
<ul style="list-style-type: none"> <li>• Proposals would negatively affect wildlife, including Sites of Biological Importance within the site. The maintenance and enhancement of the ecological linkages between the ponds and the wider environment should be an additional policy requirement. The green spaces remaining should act as a corridor to the wider corridors.</li> <li>• Tree buffers would reduce visual impact.</li> <li>• There has been a lack of analysis on the natural capital of the allocation.</li> <li>• Biodiversity net gains can be applied to green infrastructure, deciduous woodland, lowland fen and protected species.</li> <li>• Green Infrastructure definition not explained.</li> <li>• The proposals would reduce green space between Royton and Shaw.</li> <li>• The site was designated as Other Protected Open Land because of its ecology.</li> <li>• The land that development is proposed on is used for farming.</li> <li>• Release of this land is more preferable than other allocations in Royton.</li> </ul>
<p><b>Air Quality</b></p>
<ul style="list-style-type: none"> <li>• Air quality already dangerous. Increased traffic will add to this.</li> <li>• Increased traffic will increase chance of miscarriages, chest infections and asthma attacks.</li> <li>• There should be independent air quality impact assessments.</li> </ul>
<p><b>Flood risk</b></p>
<ul style="list-style-type: none"> <li>• Development will increase surface water and groundwater flood risk of lower lying areas, including by the Metrolink. Land needs to be retained for drainage.</li> <li>• Denbigh Drive suffers from surface water flood risk. Issue will be increased by taking away wetlands. Development at Denbigh Drive was limited due to drainage and land stability.</li> <li>• Water, drainage and sewer systems date back to 19<sup>th</sup> century and are at full capacity. There was a recent sewer collapse.</li> <li>• Request for independent flood risk assessment.</li> <li>• The brook at the bottom of the site not being maintained properly and the pumping station not being able to cope has resulted in flooding.</li> <li>• Use tree planting to avoid surface water run-off.</li> <li>• Site includes a Lead Local Flood Authority (LLFA) scheme (Greencroft Meadow) which will seek to address surface water management impacts. Need to liaise with LLFA to understand infrastructure requirements.</li> </ul>

<b>Other</b>
<ul style="list-style-type: none"> <li>• Large parts of the site are unavailable for development due to constraints. Making it undeliverable.</li> <li>• Poor consultation. Failed to meet Statement of Community Involvement and questions are loaded.</li> <li>• Plans are contradicting, politically motivated with no regard for National Planning Policy Framework. The plan is developer led.</li> <li>• The proposals are not fair on the people of Shaw. They will reduce the quality of life. The number of people at the protest march demonstrates this.</li> <li>• Strategic allocations are too close to each other, which would place a huge burden on infrastructure.</li> <li>• Shaw's distinct identity will be eroded.</li> </ul>
<p><b>Response to comments:</b></p> <p><b>Principle / scale of development:</b></p> <p>As per the site selection methodology, exploring opportunities on Protected Open Land (POL) sites formed the first stage of the site selection process. This stage focused on identifying land which has already been identified in district Local Plans as safeguarded land and / or POL. In the case of Oldham, POL is called Other Protected Open Land (OPOL) and the sites are protected from development through Local Plan Policy 22, due to their landscape and / or recreational purposes / significance. It was considered that before looking at opportunities within the Green Belt, POL should be considered first as it does not afford as significant protection from development as Green Belt, and is therefore considered sequentially preferable to Green Belt, and could keep the loss of Green Belt land to a minimum.</p> <p>Cowlshaw was therefore identified as an Area of Search – OL-POL-3 (see Appendix 2 of the of the Site Selection Topic Paper 2019). POL/ OPOL sites were not subject to the further site selection process, having already been identified as potential development opportunities in the first stage of the site selection methodology.</p> <p>In terms of the GMSF Spatial Strategy and Strategic Objectives, Cowlshaw is capable of delivering around 460 houses, with a mix of dwelling types and sizes to deliver more inclusive neighbourhoods and meet local needs. As such the allocation contributes to the spatial objective of boosting Northern Competitiveness, within the boroughs of Bolton, Bury, Oldham, Rochdale, Tameside, Wigan and west Salford, through contributing to meeting the housing need across Oldham.</p> <p><b>Housing (inc affordable housing):</b></p> <p>The housing methodology is covered in the Housing Background Paper. The Housing Background Paper sets out Greater Manchester's Housing Need, including how each district will meet their own housing need and the collective need of GM. It sets out the proposed methodology for meeting this need across the 10 districts and how this is intended to be delivered in line with the objectives of the plan as a whole. Oldham's current Local Housing Need (LHN) based on the government's standard methodology is for 692 new homes per year. The GMSF 2020 sets out a proposed housing requirement for Oldham of 693 new homes per year, based on the government's standard methodology and the methodology set out in the Housing Background Paper.</p> <p>Compared to the GMSF 2019, Oldham's housing need, as set out in the GMSF 2020, has been reduced from 106% of our LHN to 100% of our LHN. This is to ensure Oldham meets its local housing need, whilst protecting as much Green Belt land as possible.</p>

The 2020 allocation policy states that development will be required to provide a range of dwelling types and sizes so as to deliver more inclusive neighbourhoods and meet local needs, including the delivery of a mix of high-quality family housing. It is considered the site has the potential to meet local housing need in the immediate vicinity and across the borough and contribute to and enhance the housing mix within the area through adding to the type and range of housing available.

In the 2020 GMSF, Chapter 7 'Homes for Greater Manchester' and Policy GM- H2 sets out the approach to affordable housing across GM and supports the provision of affordable housing, either on or off-site, as part of new development, with locally appropriate requirements being set by each local authority. The 2020 allocation policy states that the development will make provision for affordable homes in line with local planning policy requirements. A Housing Strategy and Local Housing Needs Assessment has been prepared by Oldham Council which will inform Local Plan affordable housing policy.

Matters such as the impact of development in terms of overshadowing, privacy and loss of a view of existing residents would be dealt with as part of the detailed planning application in line with the Local Plan.

### **Employment and Economy:**

Chapter 6 'A Prosperous Greater Manchester' sets out the approach to employment and skills across GM, in that the plan will contribute to enhancing the supply of employment opportunities at a variety of skill levels throughout Greater Manchester to achieve more inclusive growth. Policy GM-P 2 sets out that a diverse range of employment sites and premises, both new and second-hand, will be made available across Greater Manchester in terms of location, scale, type and cost. Approximately 344,067sqm of employment floorspace is proposed for development within Oldham from 2020 to 2037. This is comprised of 70,826sqm office floorspace and 273,241sqm industry and warehousing floorspace. 120,000sqm of the industry and warehousing employment floorspace is at GM Policy Allocation 2 Stakehill and 21,720sqm is at the Broadbent Moss allocation.

### **Brownfield:**

Since the GMSF 2019, Oldham Council has carried out a comprehensive and robust review of the borough's housing land supply, significantly increasing the housing land supply within the urban area. This including emerging findings from our draft Mill Strategy, the recently completed Retail and Leisure Study and the council's aspiration for Oldham Town Centre as part of Creating a Better Place. The current housing land supply position will be available as part of the evidence to support GMSF 2020.

There are a number vacant and / or under-utilised employment sites included in Oldham's baseline housing land supply, which have been identified as having potential for residential development at some point in the future. Many of these are active employment sites or sites last used for employment purposes, such as Hartford Mill and Maple Mill.

The GMSF adopts a 'brownfield preference' policy and sets out how we (the GMCA and the ten GM districts) will do all that we can to make sure that our brownfield sites comes forward in the early part of the plan period. To do this we need to continue to press Government for support to remediate contaminated land, to provide funding for infrastructure and to support alternative models of housing delivery. However, this additional housing land identified is still not enough to meet our local housing need. Therefore, whilst we understand the significant concerns the local community has

expressed in the previous consultations regarding the proposed strategic allocations there is still a need to release land from the Green Belt for future development.

**Transport – Highways / Public Transport / Cycling / Walking:**

Transport for Greater Manchester (TfGM) appointed consultants to undertake locality assessments for each of the proposed strategic allocations. The locality assessments have considered access to the site and identified mitigation measures needed to minimise the impact of the proposed development on the local highway network, the strategic highway network (where appropriate), and multi-modal access (including public transport, cycling and walking). As part of identifying necessary local highway mitigation measures consideration has been to the cumulative impact of this site and other proposed strategic allocations within the area as appropriate.

The modelling used in the assessments is a ‘worst case’ scenario as it does not take full account of the extensive opportunities for active travel and public transport improvements in the local area. The site allocation access arrangements have been developed to illustrate that there is a practical option for site allocation access in this location and to develop indicative cost estimations. Detailed design’s consistent with Greater Manchester’s best practice Streets for All highway design principles will be required at planning application stage.

The 2020 allocation policy sets out that development of the site will be required to:

- Provide for appropriate access points to and from the site in liaison with the local highway authority. The main points of access to the site will be Cocker Mill Lane to the southern part of the site, with an emergency/controlled secondary access to Cowlshaw, Kings Road to the central part of the site that lies to the north of Cowlshaw Farm, and Denbigh Drive, with access limited to the small parcel at the north only; and
- Take account of and deliver any other highway improvements that may be needed to minimise the impact of associated traffic on the local highway network and improve accessibility to the surrounding area, including off-site highways improvements, high-quality walking and cycling infrastructure and public transport facilities.

The site is in a sustainable and accessible location, on the edge of a large area of open land and in a successful and attractive neighbourhood, and connected to neighbouring residential communities in Low Crompton, Cowlshaw, Royton and nearby town centres, including Shaw, where there is a Metrolink stop. Any development would be required to enhance links to and from the site to the bus network, to encourage sustainable modes of travel and maximise the site’s accessibility, developing building on the existing recreation routes and Public Right of Way network.

**Physical infrastructure and utilities:**

Policy GM E1 Sustainable Places of the 2020 GMSF sets out a series of criteria relation to design and the delivery of the attractive places, including a requirement that new development to be supported by critical infrastructure, such as energy, water and drainage and green spaces.

### **Social infrastructure:**

It is important to ensure that any development proposed does not place undue pressure on existing social infrastructure and takes account of the increased demand it may place on existing provision. The 2020 allocation policy outlines that as part of the development, developers will be required to contribute to additional school places, and appropriate health facilities and community facilities, where appropriate and in liaison with the local authority.

In addition to the requirements set out in the 2020 allocation policy:

- Policy GM-E 5 Education of the 2020 GMSF states that significant enhancements in education, skills and knowledge will be promoted throughout Greater Manchester by enabling the delivery of new and improved education, skills and knowledge for all ages and the delivery of sufficient school places to respond to the demands from new housing.
- Policy GM-E 6 Health of the 2020 GMSF states that new development will be required to maximise its positive contribution to health and well-being through the submission of Health Impact Assessments for all development proposals which require an Environmental Impact Assessment. Improvements in health facilities will be supported, by requiring, where appropriate, the provision of new or improved health facilities as part of new developments that would significantly increase demand.

### **Environmental – Green Infrastructure, Biodiversity, open space:**

A Preliminary Ecological Appraisal has been carried out by Greater Manchester Ecology Unit for this site to inform the GMSF. The appraisal identifies ecological features onsite, the extent to which development of the site would impact on these features, and the mitigation required. This has informed the allocation policy.

The 2020 allocation policy sets out that development of the site is required to:

- Deliver multi-functional green infrastructure (incorporating the retention and enhancement of existing public rights of way) and high-quality landscaping within the site and around the main development areas. This is to minimise the visual impact on the wider landscape, mitigate its environmental impacts, and enhance linkages with the neighbouring communities and countryside and provide opportunities for leisure and recreation.
- Retain and enhance the hierarchy of biodiversity within the site, notably the existing Cowlshaw Ponds SBI and the area of priority habitat to the south of Crompton Primary School, following the mitigation hierarchy and deliver a meaningful and measurable net gain in biodiversity, integrating them as part of the multi-functional green infrastructure network with the wider environment; and
- Carry out a Habitats Regulation Assessment and provide further surveys on amphibians (including great crested newts), extended phase 1 habitat, breeding birds, badgers and bats to inform any planning application.

Policy GM Allocation 16 also states that development of the site will be required to provide for new and/or improvement of existing open space, sport and recreation facilities

commensurate with the demand generated and local surplus' and deficiencies, in line with local planning policy requirements.

**Air Quality:**

Air Quality is covered by Policy GM-S 6 Clean Air of the 2020 GMSF which sets out a range of measures to support air quality. Government has directed Greater Manchester to produce a Clean Air Plan. The ten districts have chosen to do this collectively. In March 2019 the GM Authorities determined the best performing option to reduce NO2 across GM and agreed the submission of the Outline Business Case (OBC) to Government. A public consultation on the draft Clean Air Plan will be carried out in October/November 2020.

**Flood Risk:**

A Level 1 Strategic Flood Risk Assessment has been carried out to inform the GMSF and the proposed strategic allocations, including Cowlshaw. The SFRA mapped the allocation's flood risk, identified mitigation measures that may be appropriate and informed the allocation policy wording.

The 2020 allocation policy sets out that development of the allocation should be informed by an appropriate flood risk assessment and a comprehensive drainage strategy which includes a full investigation of the surface water hierarchy. The strategy should include details of full surface water management throughout the site as part of the proposed green and blue infrastructure. Development should deliver any appropriate recommendations, including mitigation measures and the incorporation of sustainable drainage systems integrated as part of the multi-functional green infrastructure network, and be in line with the GM Level 1 Strategic Flood Risk Assessment (SFRA) advice. Opportunities to use natural flood management and highway SUDs features should be explored.

**Other:**

Consultation on the 2019 GMSF was an informal consultation. As such, the GMCA has fulfilled its objectives to consultation. The ten authorities of Greater Manchester carried out consultation in line with their requirements as set out in their district's Statement of Community Involvement (SCI). Oldham has fulfilled its commitments as set out within its SCI. The full 2019 consultation report is available at [www.greatermanchester-ca.gov.uk/what-we-do/housing/greater-manchester-spatial-framework](http://www.greatermanchester-ca.gov.uk/what-we-do/housing/greater-manchester-spatial-framework).

Please see GMSF 2020 for the full allocation policy wording and reasoned justification.

### GM Allocation 17: Hanging Chadder (1,319 comments)

The proposed access onto Castleton Road raised serious safety concerns particularly for children given proximity to the local school. It was also felt that this point of Rochdale Road is already at saturation point. Existing public transport provision here is limited and it was felt that the proposed bus lane is “ludicrous”.

Generally there were concerns over the impact on Tandle Hills and the diminishing the importance of the areas historic view, location and ecology and in particular Site of Biological Importance, ponds and protected wildlife.

Flooding and drainage was also highlighted with current frequent flooding on Grasmere Avenue where the land is boggy and drainage being terrible. The area is full of springs and it was suggested that an Exceedance Flow Plan is needed.

<b>Principle / scale of development</b>
<ul style="list-style-type: none"> <li>• Royton is expected to take an unreasonable share of the burden of proposed developments.</li> <li>• With this proposal and all the other allocations in the area, the population of Royton would rise by at least 16% and would have lost most of its Green Belt.</li> <li>• There is no justification to build on the scale proposed.</li> </ul>
<b>Housing (inc affordable housing)</b>
<ul style="list-style-type: none"> <li>• There are 11,000 empty homes in Greater Manchester along with many brownfield sites that remain unused. Exhaust these options before sacrificing Green Belt.</li> <li>• Homes ‘in keeping with the surrounding area’ are not what are required to meet the current housing shortage.</li> <li>• The proposed housing will not be truly affordable.</li> <li>• The addition of 'executive' and 'family' style housing to the area could be beneficial to Royton Town Centre, which over the years has declined.</li> <li>• These houses will most likely be at the high end of the council tax banding to benefit the council.</li> <li>• Three, four and five bed housing will not be affordable for the local community.</li> <li>• Build new homes for the elderly and disabled.</li> <li>• There should be a limit upon how much housing is developed here so that a large area of open space and a wildlife corridor is retained.</li> <li>• The government housing target was made prior to Brexit and not based on factual data regarding the space required.</li> <li>• The empty housing stock within a Council’s area should be investigated and used, improved or developed before Green Belt land.</li> <li>• A shift to a high-density town centre-centric strategy could also be a solution to the decline of the high street. Town centre based living would encourage people to buy more locally and less off the internet.</li> </ul>
<b>Employment and Economy</b>
<ul style="list-style-type: none"> <li>• The area needs permanent jobs and good skilled employment.</li> </ul>
<b>Green Belt</b>
<ul style="list-style-type: none"> <li>• Disagree with building on Green Belt land, as it will destroy the local area.</li> <li>• This site is a vital part of the vital green corridor separating Oldham and Rochdale and building on it would be countryside encroachment. It would lead to urban sprawl.</li> </ul>

- Clarification needs to be made regarding the revised Green Belt boundary on the western side of Rochdale Road.
- Building on Green Belt is at odds with so much of the document.
- The plan encourages landowners and developers to put forward more Green Belt sites for development, with zero protection for the Green Belt despite Government confirming there is no requirement to release Green Belt.
- There seems no real desire to seek alternatives, with only lip service being given to the idea of using brownfield sites.
- Oldham Council has misrepresented the figures of Green Belt loss to its residents.
- Proposals go against the five purposes of the Green Belt. Hanging Chadder performs all of them.
- National Planning Policy Framework states boundaries can only be changed in exceptional circumstances and there are no exceptional circumstances to justify the GMSF proposals.
- Hanging Chadder does not adequately meet the GMSF Site Selection Criteria.

### **Brownfield**

- Use the inner areas for additional housing. The borough needs affordable housing in these areas, near to Metrolink stops.
- Change half the town centre from redundant shops to housing by re-zoning, conversion or re-construction.
- A number of empty buildings in Shaw town centre should be invested in as shopping habits have changed.
- Brownfield areas should be utilised instead.
- There are Brownfield sites and land with existing planning permission in the borough to satisfy at least the next five-year's demand.
- Oldham is full of sites with old mills that need to be demolished and the sites used.
- It would be more logical to use brownfield sites to build smaller, affordable homes to buy or rent.
- The current brownfield sites in Oldham cover 95.5 hectares. At the GMSF's own current projection of up 70 houses per hectare, Oldham has the capacity to develop over 6,600 houses on brownfield alone.

### **Transport – Highways / Public Transport / Cycling / Walking**

- Traffic, congestion and road safety are already a problem in the local area. Further development and the ensuing increase in vehicles will only worsen the situation.
- Recent road collapses (related to flooding) in the area evidence the inability of the roads to accept more traffic.
- A suitable and sufficient Traffic Risk Assessment of the proposals impacts on schoolchildren, pedestrians and other vulnerable road users and the inevitable increase in pollution should be carried out.
- Proposals will put an increased pressure on Rochdale Road, which is the main road from Rochdale to Oldham used for the hospital A&E department.
- There is little opportunity to expand the road without the demolition of homes.
- Thornham Old Road becomes an unadopted lane from where the current houses cease. This lane currently provides safe access to hikers, dog-walkers and horse-riders to paths extending to the Tandle Hill Country Park and War Memorial.
- The proposed bus lane is not possible there are already parked cars on Grasmere Road from the yellow lines already on Rochdale Road.
- Increased pressure on Metrolink service, which is already too busy.
- Royton sits in a critical public transport vacuum.



<ul style="list-style-type: none"> <li>• The current transport infrastructure does not even provide simple things like enough parking at the metro stops.</li> <li>• Focussing on improving cycling routes and making cycling ‘the natural choice for short journeys’ is not going to provide a realistic transport solution in an area where bad weather and steep gradients are common.</li> <li>• The scale of development is likely to give rise to traffic impacts on a cumulative level at the Strategic Road Network (SRN).</li> </ul>
<p><b>Physical Infrastructure and utilities</b></p> <ul style="list-style-type: none"> <li>• Increased pressure on Metrolink service, which is already too busy as residents from Saddleworth come to Shaw to use the Metrolink.</li> <li>• The whole proposal is termed ‘Strategic’ but for a long-term strategic plan, the local infrastructure should first be considered.</li> <li>• Infrastructure is not in place to support the proposals.</li> <li>• The current water supply, drainage and sewer systems in this part of Royton date from the 19th century and are at full capacity, a recent sewer collapse, which closed the main arterial route between Oldham, Royton and Rochdale for a week, proves this.</li> <li>• The water supply at present is very poor with low water pressure.</li> <li>• 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 commonplace.</li> <li>• Should seek legally binding agreements with developers to secure the necessary improvements to the road network, health and social care facilities and education facilities.</li> </ul>
<p><b>Social Infrastructure</b></p> <ul style="list-style-type: none"> <li>• The whole proposal is termed ‘Strategic’ but for a long-term strategic plan, the local infrastructure should first be considered.</li> <li>• The proposed development around the Royton area would double the population of Thornham and require considerable costly infrastructure and facilities.</li> <li>• The infrastructure is not in place to support the proposals.</li> <li>• Lack of facilities/ services in local area, such as health centres, dentists, schools and swimming pools. (Shaw swimming pool was not replaced when demolished).</li> <li>• Pressure on existing services and facilities - hospitals in the area and doctors surgeries are already overcrowded and difficult to get appointments.</li> <li>• There is currently a lack of amenities such as pubs and banks.</li> <li>• Fire stations are to close, engines axed and the support staff reduced by 100. Oldham Fire Service is to lose an engine. The already overstretched fire service will not be able to cope with increased housing.</li> <li>• Should seek legally binding agreements with developers to secure the necessary improvements to the road network, health and social care facilities and education facilities.</li> <li>• New supermarkets are needed and ones that are accessible without a car.</li> </ul>
<p><b>Environmental – Green Infrastructure, Biodiversity, open space</b></p> <ul style="list-style-type: none"> <li>• We need green spaces; they are the lungs of our areas.</li> <li>• Proposals will involve the loss of recreational uses of the site and Green Belt more widely for children and young people.</li> <li>• Building on Green Belt does not show a desire to improve green space.</li> <li>• Building here would diminish the striking views across the valleys into surrounding countryside and, the proposed uses would introduce a level of noise and air pollution completely at odds with the Tandle Hills Country Park.</li> <li>• Impact on wider eco-system with the loss of this wildlife will affect the food chain of birds of prey that hunt on Tandle Hill / Throp.</li> </ul>

- What compensatory provision in the form of new and/or improvement of existing open space, sport and recreation facilities' will be provided in the local area.
- The Royton Moss Site of Biological Importance lies within the development area. Proposals should protect the hydrology of the Royton Moss Local Wildlife Site. Where existing features cannot be incorporated these must be replaced and enhanced, as well as maintaining and improving linkages to the wider ecological network.
- The absence of any accompanying analysis of the natural capital of this allocation, and specifically of its habitats & species of principal importance and its ecological networks preclude further objective nature conservation comment on the justification for the selection of this site.
- The pond on Hanging Chadder adjacent to Castleton Road is a valuable community asset. The pond supports a wealth of wildlife.
- Development of this land will result in the loss of a recreational facility.
- Hanging Chadder is farmland used for grazing and hay. It also has an ecosystem that provides a habitat supporting a wide variety of wild life, invertebrates, birds, mammals and fish.
- Loss of this land will have an adverse impact on nature conservation.
- The area has a complex topography composed of steep hills, hedgerows, copses, areas of marshland, ponds and a stream fed by network of natural springs allowing nature to survive alongside farming. A natural system for reducing flood risk.
- Tyle Lodge on Thornham Old Road is on the proposed site and is a valuable community facility. It provides an important angling facility for local fishing families, including new facilities for the disabled.
- Wildlife needs to travel. All habitats and ecosystems are linked. Damage the Green Belt and it will have an ongoing detrimental effect on wildlife in the surrounding areas.
- The developers are supposed to have regard to the visual impact of the site on the wider landscape. As the site lies on a hill, the houses will be visible from a distance, and the open views of the countryside would be spoilt.
- Royton is home to Tandle Hill Country Park, which is heavily used particularly by families and dog walkers.
- If this site is developed, the low quality adjoining farmland should be converted to a forest to increase biodiversity.

#### **Air Quality**

- Any access opposite Thornham St James' school would have an adverse effect on air pollution.
- Air pollution on Rochdale Road, Castleton Road and Fir Lane is tangible.
- More traffic leads to more air pollution. Removing trees and vegetation will make this worse, consequence more asthma and COPD.
- GMCA's website for Air Quality clearly shows an Air Quality Management Area (AQMA) on Crompton Way, Shaw. The pollution levels were already exceeding the national safety objective.
- A recent report stated Greater Manchester has the highest levels of hospital visits in the UK from Asthma related conditions.
- Air pollution rates in Shaw and Royton are some of the highest in the country these proposals will only worsen this problem.

#### **Flood risk**

- The site is prone to flooding. Building houses there will only make this situation worse for existing residents.

- The current water supply, drainage and sewer systems that would be expected to serve the site date back to 19th century and are already at full capacity. Blocking natural springs will cause further problems.
- The loss of trees and natural ground cover on this site will worsen flooding here.

**Heritage**

- Negative impact on character of countryside, old weaver’s cottages and beautiful farmland.
- The area around for at least 2 miles around Tandle Hill is important green belt and historic landscape. 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 Samuel Bamford’s poem ‘My Wynder’.

**Other**

- Concerned for the farm/farming that is adjacent to the proposed land.
- Criticism of consultation process, publication, methods and online portal.
- There are a number of historic landfill sites within this strategic allocation. In line with other Allocation Policy approaches and to comply with the National Planning Policy Framework (Para 120-121) additional wording should be included to reflect the approach on this issue.

**Response to comments:**

**Principle / scale of development:**

The site selection paper identifies that Hanging Chadder meets the following site selection criteria:

- **Criteria 7** - as the sites within the area of search that Hanging Chadder is located, collectively could deliver significant local benefits by addressing the issue of a lack of larger family homes which are needed in Oldham.

In terms of the GMSF Spatial Strategy and Strategic Objectives, Hanging Chadder is capable of delivering around 260 houses, with a mix of dwelling types and sizes to deliver more inclusive neighbourhoods and meet local needs. As such the allocation contributes to the spatial objective of boosting Northern Competitiveness, within the boroughs of Bolton, Bury, Oldham, Rochdale, Tameside, Wigan and west Salford, through contributing to meeting the housing need across Oldham.

**Housing (inc affordable housing):**

The housing methodology is covered in the Housing Background Paper.

The Housing Background Paper sets out Greater Manchester’s Housing Need, including how each district will meet their own housing need and the collective need of GM. It sets out the proposed methodology for meeting this need across the 10 districts and how this is intended to be delivered in line with the objectives of the plan as a whole. Oldham’s current Local Housing Need (LHN) based on the government’s standard methodology is for 692 new homes per year. The GMSF 2020 sets out a proposed housing requirement for Oldham of 693 new homes per year, based on the government’s standard methodology and the methodology set out in the Housing Background Paper.

Compared to the GMSF 2019, Oldham’s housing need, as set out in the GMSF 2020, has been reduced from 106% of our LHN to 100% of our LHN. This is to

ensure Oldham meets its local housing need, whilst protecting as much Green Belt land as possible.

The 2020 allocation policy states that development will be required to provide a range of dwelling types and sizes, to deliver more inclusive neighbourhoods and meet local needs, including the delivery of a mix of high-quality family housing. It is considered that the site has the potential to meet local housing need in the immediate vicinity and across the borough and contribute to and enhance the housing mix within the area through adding to the type and range of housing available.

In the 2020 GMSF, Chapter 7 'Homes for Greater Manchester' and Policy GM- H2 sets out the approach

to affordable housing across GM and supports the provision of affordable housing, either on or off-site, as part of new development, with locally appropriate requirements being set for each local authority. The 2020 allocation policy states that the development will make provision for affordable homes in line with local planning policy requirements. A Housing Strategy and Local Housing Needs Assessment has been prepared by Oldham Council which will inform Local Plan affordable housing policy.

### **Employment and Economy:**

Chapter 6 'A Prosperous Greater Manchester' of the 2020 GMSF sets out the approach to employment and skills across GM, in that the plan will contribute to enhancing the supply of employment opportunities at a variety of skill levels throughout Greater Manchester to achieve more inclusive growth. Policy GM-P 2 sets out that a diverse range of employment sites and premises, both new and second-hand, will be made available across Greater Manchester in terms of location, scale, type and cost. Approximately 344,067sqm of employment floorspace is proposed for development within Oldham from 2020 to 2037. This is comprised of 70,826sqm office floorspace and 273,241sqm industry and warehousing floorspace. 120,000sqm of the industry and warehousing employment floorspace is at GM Policy Allocation 2 Stakehill and 21,720sqm is at the Broadbent Moss allocation.

Oldham's identified employment supply will be available as part of the evidence to support GMSF 2020.

### **Green Belt:**

A Green Belt Harm Assessment has been carried out to inform preparation of the GMSF. The case for exceptional circumstances relating to Hanging Chadder will be set out in the allocation's topic paper.

There has been a significant reduction in proposed Green Belt release within Oldham, with approximately 50% less Green Belt proposed for release in GMSF 2020 plan compared to the GMSF 2019. The GMSF 2019 released 363.7ha of Green Belt. GMSF 2020 proposes to release around 188ha of Green Belt.

The 2020 allocation policy requires development to contribute towards green infrastructure enhancement opportunities in the surrounding Green Belt as identified in the Identification of Opportunities to Enhance the Beneficial Use of the Green Belt assessment.

**Brownfield:**

Since the Draft Plan 2019, Oldham Council has carried out a comprehensive and robust review of the borough's housing land supply, significantly increasing the housing land supply within the urban area. This including emerging findings from our draft Mill Strategy, the recently completed Retail and Leisure Study and the council's aspiration for Oldham Town Centre as part of Creating a Better Place. The current housing land supply position will be available as part of the evidence to support GMSF 2020.

There are a number vacant and / or under-utilised employment sites included in Oldham's baseline housing land supply, which have been identified as having potential for residential development at some point in the future. Many of these are active employment sites or sites last used for employment purposes, such as Hartford Mill and Maple Mill.

The GMSF adopts a 'brownfield preference' policy and sets out how we (the GMCA and the ten GM districts) will do all that we can to make sure that our brownfield sites comes forward in the early part of the plan period. To do this we need to continue to press Government for support to remediate contaminated land, to provide funding for infrastructure and to support alternative models of housing delivery. However, this additional housing land identified is still not enough to meet our local housing need. Therefore, whilst we understand the significant concerns the local community has expressed in the previous consultations regarding the proposed strategic allocations there is still a need to release land from the Green Belt for future development.

**Transport – Highways / Public Transport / Cycling / Walking:**

Transport for Greater Manchester (TfGM) appointed consultants to undertake locality assessments for each of the proposed strategic allocations. The locality assessments have considered access to the site and identified mitigation measures needed to minimise the impact of the proposed development on the local highway network, the strategic highway network (where appropriate), and multi-modal access (including public transport, cycling and walking). As part of identifying necessary local highway mitigation measures consideration has been to the cumulative impact of this site and other proposed strategic allocations within the area as appropriate.

The modelling used in the assessments is a 'worst case' scenario as it does not take full account of the extensive opportunities for active travel and public transport improvements in the local area. The site allocation access arrangements have been developed to illustrate that there is a practical option for site allocation access in this location and to develop indicative cost estimations. Detailed design's consistent with Greater Manchester's best practice Streets for All highway design principles will be required at planning application stage.

The 2020 allocation policy sets out that development of the site will be required to:

- Provide for appropriate access points to and from the site in liaison with the local highway authority. The main points of access to the site will be off Castleton Road, near to the junction with Garden Terrace, which will link to the spine road running through the site, and a new access off Rochdale Road to the small parcel north of Grasmere Road. An emergency/controlled secondary access will be required onto Castleton Road and access to the farm retained;

- Take account of and deliver any other highway improvements that may be needed to minimise the impact of associated traffic on the local highway network and improve accessibility to the surrounding area, including off-site highways improvements, high-quality walking and cycling infrastructure and public transport facilities, such as waiting facilities at bus stops near the site; and
- Deliver multi-functional green infrastructure (incorporating the retention and enhancement of existing public rights of way) and high-quality landscaping within the site and around the main development areas, so as to minimise the visual impact on the wider landscape, mitigate its environmental impacts, enhance linkages with the neighbouring communities and countryside, and provide opportunities for leisure and recreation.

TfGM have also identified the A627/A671 corridor between Rochdale – Oldham – Ashton within the first tranche of the Streets for All corridor studies programme to improve connectivity on Greater Manchester’s Key Route Network. These corridors have been identified on the basis of their potential to support a range of GM agendas, around delivering modal shift (particularly to public transport, walking and cycling), improving air quality and regenerating local centres.

#### **Physical infrastructure and utilities:**

Policy GM E1 Sustainable Places of the 2020 GMSF sets out a series of criteria relation to design and the delivery of the attractive places, including a requirement that new development to be supported by critical infrastructure, such as energy, water and drainage and green spaces.

The 2020 allocation policy requires any development to be in accordance with a comprehensive masterplan and Design Code agreed by the local planning authority to prevent the site coming forward piecemeal.

#### **Social infrastructure:**

It is important to ensure that any development proposed does not place undue pressure on existing social infrastructure and takes account of the increased demand it may place on existing provision. The 2020 allocation policy outlines that as part of the development, developers will be required to contribute to additional school places, and appropriate health facilities and community facilities, where appropriate and in liaison with the local authority.

In addition to the requirements set out in the 2020 allocation policy:

- Policy GM-E 5 Education of the 2020 GMSF states that significant enhancements in education, skills and knowledge will be promoted throughout Greater Manchester by enabling the delivery of new and improved education, skills and knowledge for all ages and the delivery of sufficient school places to respond to the demands from new housing.
- Policy GM–E 6 Health of the 2020 GMSF states that new development will be required to maximise its positive contribution to health and well-being through the submission of Health Impact Assessments for all development proposals which require an Environmental Impact Assessment. Improvements in health

facilities will be supported, by requiring, where appropriate, the provision of new or improved health facilities as part of new developments that would significantly increase demand.

**Environmental – Green Infrastructure, Biodiversity, open space:**

A Preliminary Ecological Appraisal has been carried out by Greater Manchester Ecology Unit for this site to inform the GMSF. The appraisal identifies ecological features onsite, the extent to which development of the site would impact on these features, and the mitigation required. This has informed the allocation policy.

The 2020 allocation policy sets out that development of the site is required to:

- Deliver multi-functional green infrastructure (incorporating the retention and enhancement of existing public rights of way) and high-quality landscaping within the site and around the main development areas, so as to minimise the visual impact on the wider landscape, mitigate its environmental impacts, enhance linkages with the neighbouring communities and countryside, and provide opportunities for leisure and recreation;
- Have regard to the recommendations of the Greater Manchester Landscape Character and Sensitivity Assessment for the Pennines Foothills South / West Pennines;
- Retain and enhance areas of biodiversity within the site following the mitigation hierarchy and deliver a meaningful and measurable net gain in biodiversity, integrating existing water features across the site as part of the multi-functional green infrastructure network;
- Provide further surveys on phase 1 habitat, amphibians, bats and badgers to inform any planning application;
- Have regard to the findings of the Greater Manchester Stage 2 Green Belt Study Harm Assessment, including mitigation measures to mitigate harm to the Green Belt; and
- Contribute towards green infrastructure enhancement opportunities in the surrounding Green Belt as identified in the Identification of Opportunities to Enhance the Beneficial Use of the Green Belt assessment.

The 2020 allocation policy also states that development of the site will be required to provide for new and/or improvement of existing open space, sport and recreation facilities commensurate with the demand generated and local surplus' and deficiencies, in line with local planning policy requirements.

The reasoned justification to the 2020 allocation policy sets out that development should have regard to the ecosystem services opportunity mapping, in the improvement and enhancement of Green Infrastructure.

**Air Quality:**

Air Quality is covered by Policy GM-S 6 Clean Air of the 2020 GMSF which sets out a range of measures to support air quality. Government has directed Greater Manchester to produce a Clean Air Plan. The ten districts have chosen to do this

collectively. In March 2019 the GM Authorities determined the best performing option to reduce NO<sub>2</sub> across GM and agreed the submission of the Outline Business Case (OBC) to Government. A public consultation on the draft Clean Air Plan will be carried out in October/November 2020.

**Flood Risk:**

A Level 1 Strategic Flood Risk Assessment has been carried out to inform the GMSF and the proposed strategic allocations, including Hanging Chadder. The SFRA mapped the allocation's flood risk, identified mitigation measures that may be appropriate and informed the allocation policy wording.

The 2020 allocation policy sets out that development of the allocation should be informed by an appropriate flood risk assessment and a comprehensive drainage strategy which includes a full investigation of the surface water hierarchy. The strategy should include details of full surface water management throughout the site as part of the proposed green and blue infrastructure. Development should deliver any appropriate recommendations, including mitigation measures and the incorporation of sustainable drainage systems integrated as part of the multi-functional green infrastructure network, and be in line with the GM Level 1 Strategic Flood Risk Assessment (SFRA) advice. Opportunities to use natural flood management and highway SUDs features should be explored.

**Heritage:**

Oldham Council has prepared a Heritage Impact Assessment (HIA) for each of its strategic allocations to inform the GMSF. The outputs of which have informed the policy wording for this allocation.

The 2020 allocation policy sets out that development will be required to:

- Conserve and enhance heritage assets and their setting in accordance with the findings and recommendations of the Historic Environment Assessment (2020). An up-to-date Heritage Impact Assessment will be required for any planning applications; and
- Take into consideration the findings of the Greater Manchester Historic Environment Assessment Screening Exercise and provide an up-to-date archaeological desk-based assessment to determine if any future evaluation and mitigation will be needed.

**Landfill/ contamination:**

The 2020 allocation policy has been amended to require any development to incorporate necessary remediation measures in areas which are affected by contamination and have been previously worked for landfill purposes.

**Other:**

Consultation on the 2019 GMSF was an informal consultation. As such, the GMCA has fulfilled its objectives to consultation. The ten authorities of Greater Manchester carried out consultation in line with their requirements as set out in their district's Statement of Community Involvement (SCI). Oldham has fulfilled its commitments as set out within its SCI. The full 2019 consultation report is available at



[www.greatermanchester-ca.gov.uk/what-we-do/housing/greater-manchester-spatial-framework](http://www.greatermanchester-ca.gov.uk/what-we-do/housing/greater-manchester-spatial-framework).

Please see GMSF 2020 for the full allocation policy wording and reasoned justification.

**GM Allocation 18: Robert Fletchers (318 comments)**

It was felt that this allocation is located in the some of the highest quality of green belt in the region and that the development does not provide a buffer between the edge of Greenfield and the Peak District National Park as well as taking away farm land. It was suggested that the land remaining as Green Belt should be excluded from the allocation.

With regards to the housing itself the actual number of homes proposed is objected to and these should not be executive types but more affordable for locals. The phasing of the development should be clearer and defined in the plan with the mill site being developed first with a mix of uses. It was highlighted that calling the site Robert Fletchers is misleading as the site is much bigger than just the mill site.

There were concerns over congestion and in particular queues of traffic at Greenfield, chew valley which is already currently road busy and unable to be widened, the A635 as well as the impact of and on Dove Stones. Car parking is already a huge issue at Greenfield Station and at Dove Stones which also raises Issue for emergency vehicles.

It was felt that the access points into the site need to be reviewed, that public transport did not serve the area well at all and that the character of the area could be damaged with negative effects on tourism, ecology and green infrastructure. There were a number of comments that said holiday lodges should not be included in the plan.

<b>Principle / scale of development</b>
<ul style="list-style-type: none"> <li>• One village is carrying Saddleworth’s new housing. Development should be spread around Saddleworth. In comparison to the local population, this is not acceptable.</li> <li>• The site should be developed as a cultural, historical and environmental centre creating jobs to sustain the economy.</li> <li>• The zoning indicted on the concept plan is reflected in the red line allocation to remove uncertainty regarding land use.</li> <li>• Amount and type of retail and leisure floorspace should be defined.</li> </ul>
<b>Housing (inc affordable housing)</b>
<ul style="list-style-type: none"> <li>• The proposals should use the Office for National Statistics 2018 figures. Targets are not mandatory. A deviation can be accepted.</li> <li>• If a 10% housing figure is to be maintained for Saddleworth the plan does not address how this will be met.</li> <li>• A large percentage of housing in the area is unoccupied.</li> <li>• Feel disappointed that the housing targets and the land allocations have been reduced in the face of opposition.</li> <li>• 170 homes could be provided by apartments of varying sizes in the style of local mill architecture.</li> <li>• There is no need for executive housing, which is spoiling the character of the area.</li> <li>• Emphasis should be on high density.</li> <li>• There is a conflict between high density and character. Large plots are less environmentally damaging.</li> <li>• Affordable housing is not defined and more would be welcome.</li> </ul>
<b>Employment and Economy</b>
<ul style="list-style-type: none"> <li>• There is plenty of space at Dovestones to exploit the commercial opportunities without the need for high value housing.</li> <li>• Supportive of more employment on this site.</li> <li>• The employment projections are inflated.</li> <li>• Development will not provide long-term employment opportunities.</li> </ul>

<p><b>Green Belt</b></p> <ul style="list-style-type: none"> <li>• Disagree with building on Green Belt land.</li> <li>• Proposed development means we will lose farming land used for grazing.</li> <li>• Proposals are not in line with the National Planning Policy Framework. There are no exceptional circumstances under which land can be released from the Green Belt.</li> <li>• Moving the boundary closer to the mill site is welcomed.</li> <li>• Boundary should be redrawn to remove land that is remaining as Green Belt.</li> <li>• Only development on the Green Belt should be a small visitor centre at the site of the public toilets.</li> <li>• The development should include a buffer between the edge of Greenfield village and the National Park.</li> <li>• Green Belt land should not be used to pay for the clean-up of the mill.</li> <li>• There should be more family housing sites in more suburban areas. This will require a larger release of Green Belt or protected open land.</li> </ul>
<p><b>Brownfield</b></p> <ul style="list-style-type: none"> <li>• There are enough brownfield sites around this area. Focus on reusing derelict sites and town centres.</li> <li>• Brownfield sites should be prioritised for development.</li> <li>• Paragraph 11.128 does specify the boundary of the brownfield land (Robert Fletchers mill complex) and the boundary of the greenfield land to the west. It does not mention the area of Green Belt land to east of Fletchers Mill and along half of the existing mill access road, although this is shown on the map on page 258.</li> <li>• This site could be restricted to 50 units and housing spread elsewhere.</li> <li>• There needs to be a legal agreement for the whole site to ensure timed phasing so the brownfield part of the site comes forward in a timely matter.</li> </ul>
<p><b>Transport – Highways / Public Transport / Cycling / Walking</b></p> <ul style="list-style-type: none"> <li>• There are already traffic queues into and out of Greenfield. Further development and the ensuing additional traffic would cause too much of an unacceptable strain on roads.</li> <li>• The scale of the allocation is unlikely have the potential to give rise to traffic impacts at the Strategic Road Network on either an individual or a cumulative level.</li> <li>• Spine Road would be visually intrusive, having major landscape and biodiversity impacts.</li> <li>• Access should be informed by a Visitor Management Strategy, which separates residential and commercial traffic from the tourist traffic.</li> <li>• Uncertainty whether the access road from the Clarence and between Inglenook and the cottages is wide enough for two-way traffic.</li> <li>• Request for two-way traffic to the mixed-use site with public transport turnaround and possible closure of Banks Lane to vehicular traffic (or one-way inbound).</li> <li>• No access is shown on the plan to the units facing “site B”. Currently these use the single-track road that is going to be extended to access sites B &amp; C, there are many heavy wagons delivering to these units on a daily basis. The new road to be around the rear of the mill to access “sites D &amp; E” is also going to be used on a daily basis for wagons entering and leaving the mill and the units. This is dangerous.</li> </ul>
<p><b>Physical Infrastructure and utilities</b></p> <ul style="list-style-type: none"> <li>• United Utilities assets and associated easements need to be afforded due regard in the master planning process. They may affect deliverability dependent on the location within each allocation.</li> <li>• Roads will have to be dug up to implement utilities, which would affect businesses.</li> </ul>

<p><b>Social Infrastructure</b></p> <ul style="list-style-type: none"> <li>• Already at full capacity, taking weeks to get appointments. Previous development has resulted in little upgrading of social infrastructure.</li> <li>• There is currently a lack of infrastructure.</li> </ul>
<p><b>Environmental – Green Infrastructure, Biodiversity, open space</b></p> <ul style="list-style-type: none"> <li>• Development must enhance the setting and incorporate wildlife features.</li> <li>• Concerned that development will harm the landscape, character, beauty, views and village setting.</li> <li>• Site is a natural beauty spot used for recreation. The proposals will take away recreation, health and well-being space.</li> <li>• Footpaths need to be designed to withstand pressure of an increased local population.</li> <li>• Concerns that development and activity will have a negative impact on habitats for feeding, hunting, breeding etc.</li> <li>• Development will result in the loss of trees. Tree buffers need to be considered.</li> <li>• The existing mill road should be kept open for pedestrians and cyclists from the Clarence to Dovestones Reservoir.</li> <li>• Support the retention and improvement of the existing sports fields and recreational facilities.</li> <li>• Unlikely that the disused football field will be reused for formal recreation purposes as no demand. It could be utilised for residential development instead.</li> <li>• Important that good quality accessible space is included within sites to reduce impact on designated nature sites, including dog walking.</li> </ul>
<p><b>Air Quality</b></p> <ul style="list-style-type: none"> <li>• Extra traffic will cause further air pollution.</li> <li>• More carbon will be released from loss of the Green Belt.</li> <li>• Development should be energy efficient.</li> <li>• The 2016 GMSF allocation wording for Robert Fletchers stated that the development would need to ‘ensure high quality design that is environmentally driven including the use and water harvesting and recycling, maximum energy efficiency through good building design and fuel efficient technology, a significant reduction of car usage and household recycling facilities’. This has been excluded from the GM Allocation 18.</li> </ul>
<p><b>Flood risk</b></p> <ul style="list-style-type: none"> <li>• The area is a flood plain. Development will increase surface water run-off. Drainage will not cope with further development.</li> <li>• Statement that there will be no increase in reservoir management requirements because of new downstream receptors. There will be no increase in safety rating or spillways capacity requirements.</li> </ul>
<p><b>Heritage</b></p> <ul style="list-style-type: none"> <li>• Development will harm the historic village of Greenfield.</li> <li>• Should explore adapting some of the existing mill buildings to maintain a connection with their historical significance and past life of the village.</li> </ul>
<p><b>Other</b></p> <ul style="list-style-type: none"> <li>• Would support a mixed development in keeping with the needs of the village on this site.</li> <li>• Remediation costs will be considerable. Until understood housing numbers should not be capped.</li> <li>• The allocation and the GMSF as a whole needs to mention Section 62(2) of the Environment Act 1995 that requires all public authorities to have a duty of care to the Peak District National Park.</li> <li>• Development risks damaging the tourism offer, people enjoy the area for the views.</li> <li>• Dovestones should be retained as a local beauty spot.</li> </ul>

- Dovestones already cannot cope with the amount of weekend visitors and cars. There is no accessibility strategy for Dovestones.
- Disagree with plans for a hotel. Policy does not state where hotel would be and whether this would be new build.
- Support a hotel in Greenfield House. Policy needs to give certainty that hotel will be boutique in nature. Suggested text given
- GMSF is a strategic plan. Holiday lodges and hotel will not meet strategic objectives. Policy should just say expansion would need to satisfy Green Belt tests.
- Support a visitor centre. Should be minimal, low energy and make use of an existing building. Detail on location of visitor centre needs to be provided.

**Response to comments:**

**Principle / scale of development:**

The site selection paper identifies that Chew Brook Vale (Robert Fletchers) meets site selection criteria:

- **Criterion 1** - Land which has been previously developed and/or land which is well served by public transport.
- **Criterion 7** - Land that would deliver significant local benefits by addressing a major local problem/issue.

In relation to criterion 1 the site is made up of at least 30% previously developed land.

In relation to criterion 7 the site offers a unique opportunity to create an exemplar visitor destination at the gateway to the Peak District National Park on a largely previously developed site. Development of the site would also enable the redevelopment of Greenfield Mill which is currently derelict and vacant. Due to the scenic location of the site, it is an attractive location for larger and bespoke housing, providing a distinctive offer to the borough's housing market. There is however also a need for affordable homes across the Saddleworth villages as many residents who wish to remain living within the area cannot currently afford to do so. The site therefore provides an opportunity to enhance Oldham's housing offer and contribute to meeting Oldham's housing need, providing both low-density family and executive homes and affordable homes.

The high-level indicative concept plan prepared by Oldham Council has been used to inform how the site may be developed and the allocation policy wording. The policy wording requires any development to be in accordance with comprehensive masterplan and Design Code agreed by the local authority, including phasing arrangements

The policy wording states that any development will be required to deliver a mixed-use area on the site of the former Robert Fletchers Mill that will provide a range of commercial, leisure and retail facilities to support tourism and leisure facilities, of up to 6,000 sqm, connected to its gateway location to the Peak District National Park and capitalising on its proximity to Dove Stone Reservoir.

**Housing (incl. affordable housing):**

The housing methodology is covered in the Housing Background Paper.

The Housing Background Paper sets out Greater Manchester's Housing Need, including how each district will meet their own housing need and the collective need of GM. It sets out the proposed methodology for meeting this need across the 10 districts and how this is intended to be delivered in line with the objectives of the plan as a whole. Oldham's

current Local Housing Need (LHN) based on the government's standard methodology is for 692 new homes per year. The GMSF 2020 sets out a proposed housing requirement for Oldham of 693 new homes per year, based on the government's standard methodology and the methodology set out in the Housing Background Paper.

Compared to the GMSF 2019, Oldham's housing need, as set out in the GMSF 2020, has been reduced from 106% of our LHN to 100% of our LHN. This is to ensure Oldham meets its local housing need, whilst protecting as much Green Belt land as possible.

The GMSF 2020 sets out details of the existing housing land supply (2020-2037) for GM and the ten districts, including Oldham. The total homes delivered through the proposed strategic allocations is 2,597. The remaining 10,955 homes form the baseline housing land supply. The current housing land supply position will be available as part of the evidence to support GMSF 2020.

The site provides the potential to provide a range of high-quality family and executive homes in an attractive and desirable rural location. It also provides an opportunity to enhance Oldham's housing offer and contribute to meeting Oldham's housing need. Due to the scenic location of the site, it should be an attractive location for larger and bespoke housing, providing a distinctive offer to the borough's housing market. There is however also a need for affordable homes across the Saddleworth villages, as many residents who wish to remain living within the area cannot currently afford to do so. The policy wording states that development will be required to deliver around 170 homes with a mix of low-density family and executive homes and affordable homes of 2 and 3 bedrooms, in line with local planning policy requirements.

With regards to the style, design and density the allocation policy states that development will be required to:

- Be in accordance with a comprehensive masterplan and Design Code agreed by the local authority, including phasing arrangements; and
- Ensure high quality design that is environmentally driven, including water harvesting and recycling, maximum energy efficiency through good building design and fuel-efficient technology, a significant reduction of car usage and household recycling facilities.

Policy GM-H4 'Density of New Housing' of the 2020 GMSF sets out that new housing development should be delivered at a density appropriate to the location, reflecting the relative accessibility of the site by walking, cycling and public transport. The policy includes minimum density requirements.

In the 2020 GMSF, Chapter 7 'Homes for Greater Manchester' and Policy GM- H2 sets out the approach to affordable housing across GM and supports the provision of affordable housing, either on or off-site, as part of new development, with locally appropriate requirements being set by each local authority. The allocation policy states that development will be required to provide for affordable homes in line with local planning policy requirements. A Housing Strategy and Local Housing Needs Assessment has been prepared by Oldham Council which will inform Local Plan affordable housing policy.

### **Employment and economy:**

The 2019 GMSF proposed around 2,500sqm of B1 employment floorspace as an extension to the provision at Waterside Mill, which is to be retained as part of the allocation. Updated flooding evidence (see below) shows that this part of the site falls

within Flood Zone 3b. This element of the proposed strategic allocation as therefore been removed. The allocation policy continues to require development of this site to deliver a mixed-use area on the site of the former Robert Fletchers Mill that will provide a range of commercial, leisure and retail facilities to support tourism and leisure facilities, of up to 6,000 sqm, connected to its gateway location to the Peak District National Park and capitalising on its proximity to Dove Stone Reservoir.

**Green Belt:**

A Green Belt Harm Assessment has been carried out to inform preparation of the GMSF. The case for exceptional circumstances relating to Chew Brook Vale (Robert Fletchers) will be set out in the allocation's topic paper.

The allocation policy requires development to retain a strategic area of Green Belt in the eastern half of the site to maintain separation between the development area and Dove Stone Reservoir and the Peak District National Park.

**Brownfield:**

Since the GMSF 2019, Oldham Council has carried out a comprehensive and robust review of the borough's housing land supply, significantly increasing the housing land supply within the urban area. This includes emerging findings from our draft Mill Strategy, the recently completed Retail and Leisure Study and the council's aspiration for Oldham Town Centre as part of Creating a Better Place. The current housing land supply position will be available as part of the evidence to support GMSF 2020.

The GMSF adopts a 'brownfield preference' policy and sets out how we (the GMCA and the ten GM districts) will do all that we can to make sure that our brownfield sites comes forward in the early part of the plan period. To do this we need to continue to press Government for support to remediate contaminated land, to provide funding for infrastructure and to support alternative models of housing delivery. However, this additional housing land identified is still not enough to meet our local housing need. Therefore, whilst we understand the significant concerns the local community has expressed in the previous consultations regarding the proposed strategic allocations there is still a need to release land from the Green Belt for future development.

The allocation policy states that development will be required to be in accordance with a comprehensive masterplan and Design Code agreed by the local authority, including phasing arrangements.

**Transport – Highways / Public Transport / Cycling / Walking:**

Transport for Greater Manchester (TfGM) appointed consultants to undertake locality assessments for each of the proposed strategic allocations. The locality assessments have considered access to the site and identified mitigation measures needed to minimise the impact of the proposed development on the local highway network, the strategic highway network (where appropriate), and multi-modal access (including public transport, cycling and walking). As part of identifying necessary local highway mitigation measures consideration has been to the cumulative impact of this site and other proposed strategic allocations within the area as appropriate.

The modelling used in the assessments is a 'worst case' scenario as it does not take full account of the extensive opportunities for active travel and public transport improvements in the local area. The site allocation access arrangements have been developed to illustrate that there is a practical option for site allocation access in this location and to

develop indicative cost estimations. Detailed design's consistent with Greater Manchester's best practice Streets for All highway design principles will be required at planning application stage.

In relation to transport and highways, the allocation policy sets out that development of the site will be required to:

- Provide a new access point to the site at off the A669 / A635, including a new bridge structure;
- Take account of and deliver other highway improvements that may be needed to minimise the impact of associated traffic on the local highway network and improve access to the surrounding area, including off-site highway improvements, high-quality walking and cycling and public transport facilities, including opportunities for bus service provision into the site; and
- Incorporate multi-functional green and blue infrastructure and high levels of landscaping so as to minimise the visual impact on the wider landscape, mitigate its environmental impacts, and enhance linkages with the neighbouring communities and countryside. This should include footpath networks and recreation routes that incorporate existing trees, hedgerows, habitat areas and mill / fishing ponds, providing a range of formal and informal recreational open space and access to existing public footpath networks and woodland areas.

The allocation policy requires development to be informed by, and deliver the recommendations of, an appropriate visitor management plan to ensure that there is no adverse impact on Dovestone Reservoir, the Peak District National Park and designated conservation areas. Development must have regard to the duty to care for the Peak District National Park under Section 62(2) of the Environment Act.

#### **Physical infrastructure and utilities:**

Policy GM E1 Sustainable Places of the 2020 GMSF sets out a series of criteria relating to design and the delivery of the attractive places, including a requirement that new development be supported by critical infrastructure, such as energy, water and drainage and green spaces.

#### **Social Infrastructure:**

In relation to social infrastructure, it is important to ensure that any development proposed does not place undue pressure on existing social infrastructure and takes account of the increased demand it may place on existing provision. The allocation policy therefore outlines that as part of the development, developers will be required to contribute to additional school places, and appropriate health facilities and community facilities, where appropriate and in liaison with the local authority. Oldham Council are currently working on developing a methodology for contributions for Education, informed by local evidence of school place provision.

In addition to the requirements set out in allocation policy:

- Policy GM-E 5 Education states that significant enhancements in education, skills and knowledge will be promoted throughout Greater Manchester by enabling the delivery of new and improved education, skills and knowledge for all ages and the delivery of sufficient school places to respond to the demands from new housing.



- Policy GM–E 6 Health of the 2020 GMSF states that new development will be required to maximise its positive contribution to health and well-being through the submission of Health Impact Assessments for all development proposals which require an Environmental Impact Assessment. Improvements in health facilities will be supported, by requiring, where appropriate, the provision of new or improved health facilities as part of new developments that would significantly increase demand.

**Environmental – Green Infrastructure, Biodiversity, open space:**

Work carried out for the Habitat Regulation Assessment (HRA) has considered whether, given the proximity of the site to the Special Protection Area (SPA), it has potential to be functionally linked to the SPA; that is, birds using the SPA may also make use of this site. Evidence acquired by GMEU to inform the HRA process shows that Chew Brook Vale (Robert Fetchers) is not functionally linked to the South Pennine Moors SPA. Nevertheless, the allocation policy requires development to ensure that it does not have an adverse impact on the integrity of the nearby SPA and Special Area of Conservation (SAC). The recommendations from the HRA must be considered.

A Preliminary Ecological Appraisal has been carried out by Greater Manchester Ecology Unit for this site to inform the GMSF. The appraisal identifies ecological features onsite, the extent to which development of the site would impact on these features, and the mitigation required. This has informed the allocation policy.

The 2020 allocation policy sets out that development of the site is required to:

- Retain and enhance the hierarchy of biodiversity within the site, notably the areas of priority habitats, following the mitigation hierarchy and deliver a meaningful and measurable net gain in biodiversity, integrating them as part of multi-functional green infrastructure network with the wider environment;
- Provide a Habitat Regulations Assessment and further surveys on extended phase 1 habitats, bats, amphibians (including great crested newts), water voles and birds to inform any planning application;
- Be designed to relate positively to Chew Brook and other watercourses running through the site, integrating them as part of a multi-functional green infrastructure network, through creating a green route along the river / brook, ensuring that development is set back to allow ecological movement; and
- Protect and enhance the habitats and corridor along Chew Brook to improve the existing water quality and seek to achieve 'good' status as proposed under the EU Water Framework Directive, including the protection and enhancement of semi-natural habitats and promotion of their public enjoyment.

The allocation policy also requires any development to be informed by, and deliver the recommendations of, an appropriate visitor management plan and incorporate multi-functional green and blue infrastructure and high levels of landscaping so as to minimise the visual impact on the wider landscape, mitigate its environmental impacts, and enhance linkages with the neighbouring communities and countryside. This should include footpath networks and recreation routes that incorporate existing trees, hedgerows, habitat areas and mill / fishing ponds, providing a range of formal and informal recreational open space and access to existing public footpath networks and woodland areas.

### **Air Quality:**

Air Quality is covered by Policy GM-S 6 Clean Air of the 2020 GMSF which sets out a range of measures to support air quality. Government has directed Greater Manchester to produce a Clean Air Plan. The ten districts have chosen to do this collectively. In March 2019 the GM Authorities determined the best performing option to reduce NO<sub>2</sub> across GM and agreed the submission of the Outline Business Case (OBC) to Government. A public consultation on the draft Clean Air Plan will be carried out in October/November 2020.

### **Flood Risk:**

A Level 1 Strategic Flood Risk Assessment has been carried out to inform the GMSF and the proposed strategic allocations, including Chew Brook Vale (Robert Fletchers). An Exceptions Test was required for Chew Brook Vale to demonstrate that flood risk can be managed satisfactorily. A Level 2 SFRA was carried out and further detailed work to inform the exceptions test. The SFRA mapped the allocation's flood risk, identified recommendations and mitigation measures that may be appropriate and informed the allocation.

The criterion '*Ensure high quality design that is environmentally driven, including water harvesting and recycling, maximum energy efficiency through good building design and fuel-efficient technology, a significant reduction of car usage and household recycling facilities*' has been reinstated as part of the allocation policy.

The allocation policy requires any development to be informed by an appropriate flood risk assessment, which takes account of any recommendations from the Strategic Flood Risk Assessment Exceptions Test, and a comprehensive drainage strategy which includes a full investigation of the surface water hierarchy. The strategy should include details of full surface water management throughout the site as part of the proposed green and blue infrastructure.

The allocation policy goes on to say that any development must avoid Flood Zone 3b and deliver any appropriate recommendations, including mitigation measures, ensuring development is safe and does not increase flood risk elsewhere. Natural sustainable drainage systems should be integrated to control the rate of surface water run-off. A detailed topographical study may be required. Proposals should be integrated as part of the multi-functional green infrastructure network and be in line with the GM Level 1 Strategic Flood Risk Assessment (SFRA). Opportunities to use natural flood management and highway SUDs features should be explored.

### **Heritage:**

Oldham Council has prepared a Heritage Impact Assessment (HIA) for each of its strategic allocations to inform the GMSF. The outputs of which have informed the policy wording for this allocation. The allocation policy states that development will be required to conserve and enhance heritage assets and their setting, in accordance with the findings and recommendations of the Historic Environment Assessment (2020). An up-to-date Heritage Impact Assessment will be required for any planning applications.

The allocation policy states that development proposals should seek opportunities to secure and enhance the sustainable use of Greenfield House and other non-designated heritage assets, including their settings. The use of local materials and high-level landscaping will be required. The reasoned justification also goes on to say that any development proposals should have regard to the findings and recommendations of the

Oldham Mill Strategy and that reflecting the sites unique location, the Design Code should ensure new development is in keeping with the surrounding character of the area through the use of local materials and design.

**Other:**

In terms of managing the impact of the proposed development on the environment and the local area, the allocation policy requires any development to be informed by, and deliver the recommendations of, an appropriate visitor management plan to ensure that there is no adverse impact on Dove Stone Reservoir, the Peak District National Park and designated conservation areas. The policy also states that development must have regard to the duty to care for the Peak District National Park under Section 62(2) of the Environment Act.

Reflecting the site's proximity to Dove Stone Reservoir, there are aspirations for the following uses in the eastern section of the site - a modest expansion to the existing holiday lodge facility through the inclusion of 10 to 15 pods, a boutique hotel and a visitor education centre linking to the reservoir, in partnership with the RSPB and United Utilities. Opportunities for the sustainable re-use and enhancement of Greenfield House, including its setting, should be explored. These elements have been moved from the policy to the reasoned justification reflecting that the eastern section of the site would remain in the Green Belt and any development within this area would be determined in line with relevant national planning policy.

Please see GMSF 2020 for the full allocation policy wording and reasoned justification.

**GM Allocation 19: South of Rosary Road** (104 comments)

There were particular concerns about site access particularly with the use of Simkin Way / Saint Cuthberts Fold / Mills Farm Close. It was felt that this access is too narrow with no pavements and that it would not be possible for this to be widened. If the development does go ahead it was suggested that access should be from Fitton Hill.

There were also major concerns around the loss of local ecology and in particular regarding the impact on the Site of Biological Importance.

<p><b>Housing (inc affordable housing)</b></p> <ul style="list-style-type: none"> <li>• Placing affordable housing in a deprived area will decrease existing residential property values.</li> <li>• The area has enough affordable housing and needs property sold at full market value to help people who own properties.</li> <li>• The housing put forward by developers are three, four &amp; five bedroom houses, which will not be affordable/social homes for the community.</li> <li>• Build more social housing in affluent areas to make things fairer.</li> <li>• The Office for National Statistics figures used to calculate housing need are incorrect</li> <li>• Should regenerate unoccupied houses instead.</li> <li>• More homes should be built for the elderly and disabled.</li> </ul>
<p><b>Green Belt</b></p> <ul style="list-style-type: none"> <li>• Strongly disagree with the building of homes and businesses on Green Belt land.</li> <li>• The development of this site would have minimal impact on the Green Belt.</li> <li>• The plan is not making a greener Greater Manchester when it is reclassifying Green Belt land for development.</li> <li>• The Green Belt figures in Oldham have been misrepresented.</li> <li>• The number of Green Belt sites in Oldham have been increased. This places an unfair burden on the community of Oldham compared to other Greater Manchester boroughs.</li> </ul>
<p><b>Brownfield</b></p> <ul style="list-style-type: none"> <li>• Build on brownfield areas that need regeneration, the plan should be amended to reflect this.</li> <li>• Utilise more brownfield sites by identifying them all and reassessing the criteria for deliverability.</li> <li>• The shopping/buying habits of people have changed so re-develop the town centres as these areas are becoming more derelict.</li> </ul>
<p><b>Transport – Highways / Public Transport / Cycling / Walking</b></p> <ul style="list-style-type: none"> <li>• Access via Saint Cuthberts Fold, Simkin Way or Mills Farm Close would not be safe or appropriate. Access would need to come off Rosary Road.</li> <li>• Any traffic accessing this area via Fir Tree Ave/Rosary road would put an excess strain on roads that are already busy and dangerous.</li> <li>• Future increase in traffic and population, which will have an adverse effect on the area.</li> <li>• This area is nowhere near the multibillion-pound Metrolink. Houses should be built closer to the it.</li> <li>• There are unfinished roads in this area from previous initiatives.</li> <li>• There are many accidents on the roads in this area.</li> <li>• The scale of the allocation is unlikely to give rise to traffic impacts at the Strategic Road Network on either an individual or cumulative level.</li> </ul>

<p><b>Physical Infrastructure and utilities</b></p> <ul style="list-style-type: none"> <li>• Roads will have to be dug up to provide power, internet and sewage systems - this will lead to delays on the road network and will have a knock on to existing business, possibly leading to a reduction in revenue.</li> <li>• United Utilities have already taken over the land at the top of cul-de-sac due to ongoing works that will service the city centre.</li> </ul>
<p><b>Social Infrastructure</b></p> <ul style="list-style-type: none"> <li>• A strain will be put on health centres, GPs, hospitals, dentists, community centres and schools.</li> <li>• More amenities are needed in the area before any more houses are built, as the current ones are overstretched.</li> <li>• The area was promised a new school and it never arrived.</li> </ul>
<p><b>Environmental – Green Infrastructure, Biodiversity, open space</b></p> <ul style="list-style-type: none"> <li>• Tree buffers should be considered to reduce visual impact on the surrounding landscape</li> <li>• Removing the buffer zone to a woodland edge habitat is likely to reduce its value for many animal species.</li> <li>• The policy must require the incorporation of a suitable buffer zone to protect and enhance the important features of the Local Wildlife Site (SBI G12: Bankfield Clough) and require the delivery of functional ecological networks into green infrastructure to enable free movement of species of principal importance.</li> <li>• This would only be agreeable if some low quality adjoining farmland is converted to forest to increase biodiversity.</li> <li>• These proposals will lead to more light and noise pollution.</li> </ul>
<p><b>Air Quality</b></p> <ul style="list-style-type: none"> <li>• More vehicle traffic on Mills Farm Close will lead to more noise pollution and more air pollution, which can affect asthmatic conditions.</li> <li>• More carbon will be released.</li> </ul>
<p><b>Flood risk</b></p> <ul style="list-style-type: none"> <li>• This development will increase flooding.</li> <li>• Consider tree planting to avoid surface water runoff down slope</li> </ul>
<p><b>Other</b></p> <ul style="list-style-type: none"> <li>• There are no safe spaces for children to play on the street.</li> <li>• The increased level of security the perimeter wall this estate has is part of the unique selling points that has attracted the many to the location. Removing this not only creates a significant risk to the residents of the estate, but also has the potential to devalue the entire location.</li> </ul>
<p><b>Response to comments:</b></p> <p><b>Principle / scale of development:</b></p> <p>The site selection paper identifies that South of Rosary Road meets the following site selection criteria:</p> <ul style="list-style-type: none"> <li>• <b>Criterion 5</b> – as the site lies in an area close to one of the most deprived areas in the country and thus development of the site is capable of aiding regeneration in the area, and delivering a range of housing types to diversify the existing housing stock in the area.</li> </ul>

In terms of the GMSF Spatial Strategy and Strategic Objectives, South of Rosary Road is capable of delivering around 60 houses, with a mix of dwelling types and sizes to deliver more inclusive neighbourhoods and meet local needs. As such the allocation contributes to the spatial objective of boosting Northern Competitiveness, within the boroughs of Bolton, Bury, Oldham, Rochdale, Tameside, Wigan and west Salford, through contributing to meeting the housing need across Oldham.

**Housing (incl. affordable housing):**

The housing methodology is covered in the Housing Background Paper.

The Housing Background Paper sets out Greater Manchester's Housing Need, including how each district will meet their own housing need and the collective need of GM. It sets out the proposed methodology for meeting this need across the 10 districts and how this is intended to be delivered in line with the objectives of the plan as a whole. Oldham's current Local Housing Need (LHN) based on the government's standard methodology is for 692 new homes per year. The GMSF 2020 sets out a proposed housing requirement for Oldham of 693 new homes per year, based on the government's standard methodology and the methodology set out in the Housing Background Paper.

Compared to the GMSF 2019, Oldham's housing need, as set out in the GMSF 2020, has been reduced from 106% of our LHN to 100% of our LHN. This is to ensure Oldham meets its local housing need, whilst protecting as much Green Belt land as possible.

The 2020 allocation policy states that development will be required to provide a range of dwelling types and sizes, to deliver more inclusive neighbourhoods and meet local needs, including the delivery of high-quality family housing. It is considered the site has the potential to meet local housing need in the immediate vicinity and across the borough and contribute to, and enhance, the housing mix within the area, through adding to the type and range of housing available.

In the 2020 GMSF, Chapter 7 'Homes for Greater Manchester' and Policy GM- H2 sets out the approach to affordable housing across GM and supports the provision of affordable housing, either on or off-site, as part of new development, with locally appropriate requirements being set by each local authority. The specific requirement for affordable housing has been removed from the 2020 allocation policy. Nevertheless, the site has the potential to meet local housing need in the immediate vicinity and across the borough and contribute to and enhance the housing mix within the surrounding area through adding to the type and range of housing available, informed by Oldham Council's Housing Strategy and Local Housing Needs Assessment.

**Green Belt:**

A Green Belt Harm Assessment has been carried out to inform preparation of the GMSF. The case for exceptional circumstances relating to South of Rosary Road will be set out in the allocation's topic paper.

There has been a significant reduction in proposed Green Belt release within Oldham, with approximately 50% less Green Belt proposed for release in GMSF 2020 compared to GMSF 2019. The GMSF 2019 released 363.7ha of Green Belt. GMSF 2020 proposes to release around 188ha of Green Belt.

**Brownfield:**

Since the GMSF 2019, Oldham Council has carried out a comprehensive and robust review of the borough's housing land supply, significantly increasing the housing land supply within the urban area. This including emerging findings from our draft Mill Strategy, the recently completed Retail and Leisure Study and the council's aspiration for Oldham Town Centre as part of Creating a Better Place. The current housing land supply position will be available as part of the evidence to support GMSF 2020.

The GMSF adopts a 'brownfield preference' policy and sets out how we (the GMCA and the ten GM districts) will do all that we can to make sure that our brownfield sites comes forward in the early part of the plan period. To do this we need to continue to press Government for support to remediate contaminated land, to provide funding for infrastructure and to support alternative models of housing delivery. However, this additional housing land identified is still not enough to meet our local housing need. Therefore, whilst we understand the significant concerns the local community has expressed in the previous consultations regarding the proposed strategic allocations there is still a need to release land from the Green Belt for future development.

**Transport – Highways / Public Transport / Cycling / Walking:**

Transport for Greater Manchester (TfGM) appointed consultants to undertake locality assessments for each of the proposed strategic allocations. The locality assessments have considered access to the site and identified mitigation measures needed to minimise the impact of the proposed development on the local highway network, the strategic highway network (where appropriate), and multi-modal access (including public transport, cycling and walking). As part of identifying necessary local highway mitigation measures consideration has been to the cumulative impact of this site and other proposed strategic allocations within the area as appropriate.

The modelling used in the assessments is a 'worst case' scenario as it does not take full account of the extensive opportunities for active travel and public transport improvements in the local area. The site allocation access arrangements have been developed to illustrate that there is a practical option for site allocation access in this location and to develop indicative cost estimations. Detailed design's consistent with Greater Manchester's best practice Streets for All highway design principles will be required at planning application stage.

The 2020 allocation policy sets out that development of the site will be required to:

- Provide for appropriate access points to and from the sites in liaison with the local highway's authority. The main point of access to the site will be through the neighbouring former Centre for Professional Development site and onto Rosary Road, with the potential for a secondary emergency only access from St Cuthbert's Fold; and
- Take account of and deliver any other highway improvements that may be needed to minimise the impact of associated traffic on the local highway network and improve accessibility to the surrounding areas, including off-site highway improvements, high-quality walking and cycling infrastructure and public transport facilities.

The site is well positioned in a sustainable and accessible location that has good connectivity to the wider highway network. The site has good access to public

transport and a range of local services with access to bus routes along Ashton Road between Tameside and Oldham. TfGM have also identified the A627/A671 corridor between Rochdale – Oldham – Ashton within the first tranche of the ‘Streets for All’ corridor studies to improve connectivity on Greater Manchester’s Key Route Network. These corridors have been identified due to their potential to support a range of GM agendas, around delivering modal shift (particularly to public transport, walking and cycling), improving air quality and regenerating local centres. Any development would therefore be required to enhance links to and from the site to the bus network, to encourage sustainable modes of travels and maximise the sites accessibility, building on the existing recreation routes and Public Right of Way network.

**Physical infrastructure and utilities:**

The 2020 allocation policy states that development will be required to ensure that appropriate access is maintained for United Utilities to their on-site infrastructure.

Policy GM E1 Sustainable Places of the 2020 GMSF sets out a series of criteria relation to design and the delivery of the attractive places, including a requirement that new development to be supported by critical infrastructure, such as energy, water and drainage and green spaces.

**Social infrastructure:**

It is important to ensure that any development proposed does not place undue pressure on existing social infrastructure and takes account of the increased demand it may place on existing provision. The 2020 allocation policy therefore outlines that as part of the development, developers will be required to contribute to additional school places, and appropriate health facilities and community facilities, where appropriate and in liaison with the local authority.

In addition to the requirements set out in the 2020 allocation policy:

- Policy GM-E 5 Education of the 2020 GMSF states that significant enhancements in education, skills and knowledge will be promoted throughout Greater Manchester by enabling the delivery of new and improved education, skills and knowledge for all ages and the delivery of sufficient school places to respond to the demands from new housing.
- Policy GM–E 6 Health of the 2020 GMSF states that new development will be required to maximise its positive contribution to health and well-being through the submission of Health Impact Assessments for all development proposals which require an Environmental Impact Assessment. Improvements in health facilities will be supported, by requiring, where appropriate, the provision of new or improved health facilities as part of new developments that would significantly increase demand.

**Environmental – Green Infrastructure, Biodiversity, open space:**

A Preliminary Ecological Appraisal has been carried out by Greater Manchester Ecology Unit for this site to inform the GMSF. The appraisal identifies ecological features onsite, the extent to which development of the site would impact on these features, and the mitigation required. This has informed the allocation policy.



The 2020 allocation policy sets out that development of the site is required to:

- Retain and enhance the hierarchy of biodiversity within the site, notably Bankfield Clough SBI and the area of priority habitat to the south of the site, following the mitigation hierarchy and deliver a meaningful and measurable net gain in biodiversity, integrating the delivery of functional ecological networks into multi-functional green infrastructure to enable free movement of species of principal importance. Planning proposals should incorporate a suitable buffer between development plots and the SBI to protect its important features; and
- Provide further surveys on extended phase 1 habitats and bats, to inform any planning application.

The 2020 allocation policy also requires development to provide for new and/or improvement of existing open space, sport and recreation facilities commensurate with the demand generated and local surpluses and deficiencies, in line with local planning policy requirements.

**Air Quality:**

Air Quality is covered by Policy GM-S 6 Clean Air of the 2020 GMSF which sets out a range of measures to support air quality. Government has directed Greater Manchester to produce a Clean Air Plan. The ten districts have chosen to do this collectively. In March 2019 the GM Authorities determined the best performing option to reduce NO<sub>2</sub> across GM and agreed the submission of the Outline Business Case (OBC) to Government. A public consultation on the draft Clean Air Plan will be carried out in October/November 2020.

**Flood Risk:**

A Level 1 Strategic Flood Risk Assessment has been carried out to inform the GMSF and the proposed strategic allocations, including Land south of Coal Pit Lane (Ashton Road). The SFRA mapped the allocation's flood risk, identified mitigation measures that may be appropriate and informed the allocation policy wording.

The 2020 allocation policy states that any development will be informed by an appropriate flood risk assessment and a comprehensive drainage strategy which includes a full investigation of the surface water hierarchy. The strategy should include details of full surface water management throughout the site as part of the proposed green and blue infrastructure. Development should deliver any appropriate recommendations, including mitigation measures and the incorporation of sustainable drainage systems as part of the multi-functional green infrastructure network and be in line with the GM Level 1 Strategic Flood Risk Assessment (SFRA) advice. Opportunities to use natural flood management and highway SUDs features should be explored.

**Other:**

Policy GM E1 Sustainable Places of the 2020 GMSF sets out a series of criteria relation to design and the delivery of the attractive places that new development will need to have regard to.

Please see GMSF 2020 for the full allocation policy wording and reasoned justification.

**GM Allocation 20: Spinners Way/Alderney Farm ( 98 comments)**

It was highlighted that there are already lots of affordable housing being developed in the area and there were concerns that more of this sort of development will de-value the existing houses even the new houses will not be affordable for many locals. With regards to access to the site Access would be difficult. Cars come down Ripponden Road fast and concerned regarding road safety.

There were concerns with flood risk and drainage issues, poor public transport, congestion, ecology, public rights of way and particular paths to Besom Hill Country Park an amenity with the topography of the site meaning that houses will be overlooked.

<p><b>Housing (inc affordable housing)</b></p> <ul style="list-style-type: none"> <li>• Placing affordable housing in a deprived area will decrease existing residential property values.</li> <li>• The area has enough affordable housing and needs property sold at full market value to help people who own properties.</li> <li>• The housing put forward by developers are three, four &amp; five bedroom houses, which will not be affordable/social homes for the community.</li> <li>• Build more social housing in affluent areas to make things fairer.</li> <li>• The Office for National Statistics figures used to calculate housing need are incorrect</li> <li>• Should regenerate unoccupied houses instead.</li> <li>• More homes should be built for the elderly and disabled.</li> </ul>
<p><b>Green Belt</b></p> <ul style="list-style-type: none"> <li>• Strongly disagree with the building of homes and businesses on Green Belt land.</li> <li>• The development of this site would have minimal impact on the Green Belt.</li> <li>• The plan is not making a greener Greater Manchester when it is reclassifying Green Belt land for development.</li> <li>• The Green Belt figures in Oldham have been misrepresented.</li> <li>• The number of Green Belt sites in Oldham have been increased. This places an unfair burden on the community of Oldham compared to other Greater Manchester boroughs.</li> </ul>
<p><b>Brownfield</b></p> <ul style="list-style-type: none"> <li>• Build on brownfield areas that need regeneration, the plan should be amended to reflect this.</li> <li>• Utilise more brownfield sites by identifying them all and reassessing the criteria for deliverability.</li> <li>• The shopping/buying habits of people have changed so re-develop the town centres as these areas are becoming more derelict.</li> </ul>
<p><b>Transport – Highways / Public Transport / Cycling / Walking</b></p> <ul style="list-style-type: none"> <li>• Access via Saint Cuthberts Fold, Simkin Way or Mills Farm Close would not be safe or appropriate. Access would need to come off Rosary Road.</li> <li>• Any traffic accessing this area via Fir Tree Ave/Rosary road would put an excess strain on roads that are already busy and dangerous.</li> <li>• Future increase in traffic and population, which will have an adverse effect on the area.</li> <li>• This area is nowhere near the multibillion-pound Metrolink. Houses should be built closer to the it.</li> <li>• There are unfinished roads in this area from previous initiatives.</li> <li>• There are many accidents on the roads in this area.</li> <li>• The scale of the allocation is unlikely to give rise to traffic impacts at the Strategic Road Network on either an individual or cumulative level.</li> </ul>

<p><b>Physical Infrastructure and utilities</b></p> <ul style="list-style-type: none"> <li>• Roads will have to be dug up to provide power, internet and sewage systems - this will lead to delays on the road network and will have a knock on to existing business, possibly leading to a reduction in revenue.</li> <li>• United Utilities have already taken over the land at the top of cul-de-sac due to ongoing works that will service the city centre.</li> </ul>
<p><b>Social Infrastructure</b></p> <ul style="list-style-type: none"> <li>• A strain will be put on health centres, GPs, hospitals, dentists, community centres and schools.</li> <li>• More amenities are needed in the area before any more houses are built, as the current ones are overstretched.</li> <li>• The area was promised a new school and it never arrived.</li> </ul>
<p><b>Environmental – Green Infrastructure, Biodiversity, open space</b></p> <ul style="list-style-type: none"> <li>• Tree buffers should be considered to reduce visual impact on the surrounding landscape</li> <li>• Removing the buffer zone to a woodland edge habitat is likely to reduce its value for many animal species.</li> <li>• The policy must require the incorporation of a suitable buffer zone to protect and enhance the important features of the Local Wildlife Site (SBI G12: Bankfield Clough) and require the delivery of functional ecological networks into green infrastructure to enable free movement of species of principal importance.</li> <li>• This would only be agreeable if some low quality adjoining farmland is converted to forest to increase biodiversity.</li> <li>• These proposals will lead to more light and noise pollution.</li> </ul>
<p><b>Air Quality</b></p> <ul style="list-style-type: none"> <li>• More vehicle traffic on Mills Farm Close will lead to more noise pollution and more air pollution, which can affect asthmatic conditions.</li> <li>• More carbon will be released.</li> </ul>
<p><b>Flood risk</b></p> <ul style="list-style-type: none"> <li>• This development will increase flooding.</li> <li>• Consider tree planting to avoid surface water runoff down slope</li> </ul>
<p><b>Other</b></p> <ul style="list-style-type: none"> <li>• There are no safe spaces for children to play on the street.</li> <li>• The increased level of security the perimeter wall this estate has is part of the unique selling points that has attracted the many to the location. Removing this not only creates a significant risk to the residents of the estate, but also has the potential to devalue the entire location.</li> </ul>
<p><b>Response to comments:</b></p> <p>GMSF 2019 Policy GM Allocation 20 Spinners Way / Alderney Farm has been removed and is not proposed as a strategic allocation in GMSF 2020.</p>

**GM Allocation 21: Thornham Old Road (2,147 comments)**

Traffic in the area is already congested especially around the Narrowgate Brow and Thornham Old Road junction and there is concern with the access points to the site. Thornham Old Road itself is currently unadopted after the houses, and provides safe access for hikers, dog walkers & horse-riders to paths extending to Tandle Hill Country Park. Public transport is also inadequate and has some of the worst air pollution (around the A627M) in the country..There is insufficient social infrastructure including leisure facilities to meet the demands of the new residents and there also concerns about utility provision in the area not being designed for current consumption levels..

This Green Belt area is needed for quality of life and community recreation in densely built up areas like Royton and means that Oldham and Rochdale remain distinct and would eradicate the sense of history and landscape that surrounds Tandle Hill.

It is felt that there is little or no regard to the local farming industry.ot towards the ecology on site Of particular concern was Tyle Lodge, a valued community facility with prosperous wildlife.

Homes will not be affordable for local people and a number of people felt there was no need for executive homes in the area. It was also raised that the road around the site already has flooding issues and.the huge loss of land-soak given over to hard standing will only exacerbate the problem..

<p><b>Principle / scale of development</b></p> <ul style="list-style-type: none"> <li>• Too many additional houses are proposed.</li> <li>• The impact of this allocation, and others in the area, would change the scale and character of the area so drastically, its current qualities and attributes such as village feel, clean air, open space, permeability and relative safety would be damaged and lost.</li> <li>• Obvious urban extension in a sustainable area.</li> </ul>
<p><b>Housing (inc affordable housing)</b></p> <ul style="list-style-type: none"> <li>• The proposed housing will not be affordable for local people. They will probably be for commuters who work in Manchester city centre.</li> <li>• There is no need for executive housing in this area.</li> <li>• The addition of executive and family style housing could be beneficial to Royton Town Centre, which has declined over the years.</li> <li>• We need homes for the elderly and disabled.</li> <li>• We should make plots of land available to buy for people to build their own houses on, in their preferred style, instead of building the same old, unimaginative houses.</li> <li>• Homes ‘in keeping with the surrounding area’ are not what are required to meet the current housing shortage. The Government has stated that affordable housing and social and council houses for rent are urgently required.</li> <li>• The delivery of around 600 homes is an estimate of the site’s capacity for new development and should not be used as a ceiling to restrict the number of units being proposed at the planning application stage.</li> <li>• The overall housing requirement of 201,000 dwellings over the plan period (2018-37) is too low and a higher housing need figure should be used.</li> <li>• There are flaws in Oldham’s Strategic Housing Land Availability Assessment (SHLAA).</li> </ul>
<p><b>Green Belt</b></p> <ul style="list-style-type: none"> <li>• The proposals would lead to a joining up of Oldham and Rochdale. The Green Belt gap would be reduced from 1.5km to 0.6km.</li> <li>• This Green Belt is needed for quality of life and community recreation in densely built up areas like Royton.</li> </ul>

- The area identified was previously categorised as special conservation Green Belt.
- The number of people who turned out at the protest walks two years ago shows the strength of thoughts and feelings of the local people towards the building on Green Belt land.
- Clarification needs to be made regarding the revised Green Belt boundary on the western side of Rochdale Road.
- This proposed allocation would provide significant harm to the environment and undermines Green Belt objectives.
- If GMA2 to the west proceeded, this would result in the green belt gap between Royton and Stakehill/Castleton to the west to only 500 meters. This would further reduce the role, functions and integrity of the Green Belt.
- Oldham Council has misrepresented the figures of Green Belt loss to its residents.
- The claim that “half of the Green Belt has been saved” while may be true at metropolitan level, is not true in relation to Oldham. Just five wards in Oldham account for 10% of Green Belt loss across the whole of Greater Manchester.
- Proposals go against the five outline purposes of Green Belt.

### **Brownfield**

- Money for brownfield site remediation must be found in the short to medium term, from either Central, Regional or local Council sources so that these sites are not left for future generations to deal with.
- A brownfield first policy should be considered.
- We should be focusing on regenerating towns and encouraging people to reside in these areas. A shift to a high-density town centre could be a solution to the decline of the high street.

### **Transport – Highways / Public Transport / Cycling / Walking**

- Traffic and congestion are already a problem in the local area. The proposed development would make it worse.
- Thornham Old Road currently provides safe access to hikers, dog walkers and horse riders to paths extending to Tandle Hill Country Park and its iconic War Memorial.
- There are frequent accidents on Rochdale Road due to difficulty in pulling out onto the road.
- Recent road collapses related to flooding in the area evidence the inability to accept more traffic.
- The proposed development would lead to an increase in already long journey times between Oldham and Royton.
- A suitable and sufficient Traffic Risk Assessment needs to be carried out to assess the impact on schoolchildren, pedestrians, vulnerable road users and our environment.
- The additional infrastructure proposed will not solve existing high levels of congestion. Transport modelling is needed to assess the impact of vehicular traffic on key junctions on Rochdale Road
- There is no direct access to the Metrolink or train services for Royton residents.
- The main bus stop for Thornham is immediately opposite the junction and pedestrians already have difficulty crossing the road.
- Rochdale Road does not have much public transport unless you want to go to Oldham.
- Rochdale Road is already a 'Quality Bus Corridor' and yet travel times between Oldham, Rochdale and Manchester are unacceptably long. An increased frequency of buses will be ineffective in queuing traffic and congestion will exacerbate vehicle emissions.
- Transport for Greater Manchester have identified the A671 as having the potential to support modal shift, improving air quality and regenerating local centres and identified it within the first tranche of pipeline work for the Streets for All Programme.

<ul style="list-style-type: none"> <li>• The scale of development is of a concern from a cumulative perspective on the Strategic Road Network due to close geographic proximity of other proposed allocated development sites in the immediate local area.</li> </ul>
<p><b>Physical Infrastructure and utilities</b></p> <ul style="list-style-type: none"> <li>• 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. The current water supply, drainage and sewer systems that would be expected to serve the site date back to 19th century and are already at full capacity.</li> <li>• The additional infrastructure proposed will not solve existing high levels of congestion.</li> <li>• Royton town centre would not be able to cope with the increase in traffic. You cannot find a car parking spot in the town centre as it is.</li> </ul>
<p><b>Social Infrastructure</b></p> <ul style="list-style-type: none"> <li>• Insufficient infrastructure to meet the demands of the new residents, existing health and education provision is already stretched and over-capacity.</li> <li>• Need to make sure facilities are put in place for the additional people.</li> <li>• There is a lack of leisure facilities in the area. Shaw swimming pool was not replaced when it was demolished.</li> <li>• There is a lack of emergency resource and increased pressure on them. Oldham Fire Station is losing an engine.</li> <li>• It should be made clear that the provision of additional school places would only be necessary if there is insufficient capacity within existing schools.</li> </ul>
<p><b>Environmental – Green Infrastructure, Biodiversity, open space</b></p> <ul style="list-style-type: none"> <li>• The “protected green spaces” identified in the GMSF for this area are, at best, tokenistic, and at worst, cynical, amounting to a narrow strip of land between Thornham Old Road and the A627(M) spur.</li> <li>• Removing this area will diminish the views from Tandle Hill and Chadderton Heights and harm the setting of Tandle Hill as an important natural asset.</li> <li>• Tandle Hills are frequented by tens of thousands of local visitors who regularly visit to walk cycle and exercise. This is a resource that the area needs more of, not less.</li> <li>• Will be a loss of recreational uses of the site and Green Belt more widely for children and young people.</li> <li>• The proposals give little or no regard to the local farming industry.</li> <li>• There is a diverse array of wildlife on this site that would be affected by development.</li> <li>• Tyle Lodge is a valuable facility to local Fishermen. Its removal would mean not only a loss of community and recreational space, but also a loss of wildlife habitat.</li> <li>• The absence of accompanying analysis of the natural capital of this allocation and specifically of its habitats, species of principal importance and ecological networks preclude further objective nature conservation comment on the justification for the selection of this site.</li> <li>• The vehicles driven by new residents would pollute the environment.</li> <li>• Thornham Old Road is one of the preferred pedestrian access points to Tandle Hill Country Park.</li> <li>• The strategy talks of improvement of right of way, but tarmacking a footpath is far removed from the current natural condition of the footpaths.</li> <li>• Open and historic views of the countryside would be ruined.</li> <li>• Spoiling views is a contradiction of policies to improve green areas.</li> <li>• There is no definition included within the policy of what is meant by multi-functional green infrastructure. If green infrastructure is to include particular uses or roles, then these should be set out in the policy and justified.</li> <li>• Any site-specific requirements for open-space, sport and recreation facilities should be set out in the policy and justified through robust evidence.</li> </ul>

<b>Air Quality</b>
<ul style="list-style-type: none"> <li>• Air pollution on Rochdale Road, Castleton Road and Fir Lane is tangible. There are already high levels of nitrogen oxide.</li> <li>• Building more homes runs contrary to Greater Manchester’s aims to clean up the air and reduce pollution</li> <li>• Air quality levels in the M60/62/66 and A627M corridors in particular are already over the recommended limits. The proposals will make air quality worse and that this will have a knock on effect to health services and health of the current population.</li> <li>• Professor Paul Cosford, Director of Health Protection and Medical Director at Public Health England, published findings that air pollution is the biggest environmental threat to health in the UK, with between 28,000 and 36,000 deaths a year attributed to long-term exposure. There is strong evidence that air pollution causes the development of coronary heart disease, stroke, respiratory disease and lung cancer, and exacerbates asthma. Manchester has the highest number of hospital admissions for Asthma in the country.</li> <li>• Oldham Council must consult on its plan to reduce the air pollution with a view to implementing its plan by 2021. Surely, the proposals to build so many houses will be a contravention of its statutory responsibilities.</li> <li>• There are concerns over the future of Thornham Cricket Club if these proposals go ahead.</li> </ul>
<b>Flood risk</b>
<ul style="list-style-type: none"> <li>• The current water supply, drainage and sewer systems that would be expected to serve the site date back to 19th century and are already at full capacity.</li> <li>• Groundwater drainage is poor in this area.</li> <li>• Roads here already have issues with flooding and United Utilities have built an underground holding tank at the eastern end of the road to combat the problem. The huge loss of land-soak given over to hard standing will only exacerbate the problem.</li> <li>• There has been consistent flooding in this area lately including flash flooding which would only be exacerbated by the proposed development.</li> <li>• The GMSF removes the greenfield runoff which is inadequate.</li> </ul>
<b>Heritage</b>
<ul style="list-style-type: none"> <li>• The open and historic views to the countryside would be ruined.</li> <li>• This would harm the setting of Tandle Hill as an important natural asset. It would eradicate that sense of history and landscape that surrounds Tandle Hill, with its hedge lined Thornham Old Lane along which the reformers of Peterloo marched to Tandle Hill to undertake military drilling in the Summer of 1819.</li> <li>• The area is of archaeological importance. From the medieval era farmhouse of Cinder Hill to the old field systems and roads (on which medieval coins have been found) to the living tracks of today. The past lives and awaits a complete archaeological survey before all this is lost to sprawl and traffic.</li> </ul>
<b>Other</b>
<ul style="list-style-type: none"> <li>• There should be an investigation into the purchase of this land.</li> <li>• Royton should stay as a small market town.</li> <li>• Development will decrease the value of other properties.</li> <li>• Questions over viability of the site given access constraints and mine shafts.</li> <li>• Area will be affected by light pollution from Stakehill development which already affects people and wildlife.</li> <li>• The proposed development would have a negative impact on the physical and mental health and wellbeing of the local population because of the loss of access to green space.</li> <li>• Plumpton Terrace already shakes structurally when heavy goods traffic passes on the main road — any building work could potentially affect the structure further and impact insurance of the property.</li> </ul>

**Response to comments:**

GMSF 2019 Policy GM Allocation 21 Thornham Old Road has been removed and is not proposed as a strategic allocation in GMSF 2020.



**GM Allocation 22: Woodhouses** (576 comments)

With regards to highways it was generally felt that Medlock Road is unsuitable for such an increase in numbers and all potential access points would destroy even more green belt. It was also felt that public transport in the area is also terrible and not considered to meet National Planning Policy Framework requirement or the site selection criteria. There were concerns over the heritage of the area and the impact of the scale of the development on Woodhouses Conservation Area and contravene the Listed Building and Conservation Area Act 1990. It is suggested that a Heritage Impact Assessment should be carried out.

The loss of ecology was also a major objection to the development and in particular in relation to the impact on SBIs and BAP species. It was also suggested that a flood risk assessment should be carried out. The proposed homes in this allocation were not seen as being affordable for many residents within this area and it is difficult to see how affordable housing will be provided. There was also concern about the loss of value on existing homes as this is considered to a premium area and proposed development will devalue existing properties.

<b>Principle / scale of development</b>
<ul style="list-style-type: none"> <li>• 200 houses is a 50% increase to Woodhouses and would change the character of the village completely.</li> <li>• The area is already over-developed. It will lose its 'rural feel'.</li> </ul>
<b>Housing (inc affordable housing)</b>
<ul style="list-style-type: none"> <li>• Properties in Woodhouses would not be affordable.</li> <li>• The homes being proposed are three, four &amp; five bedroom – they will not be affordable/social homes for the community.</li> <li>• How has the need for 260 in Woodhouses been determined? Especially since there are two undeveloped housing allocations in Woodhouses already.</li> <li>• Houses in Woodhouses are for people with money, not people who need social housing, and that will affect the value of existing homes.</li> <li>• Respondents want an explanation as to why there is a need to build new properties at all, as with Brexit, migration from the UK is expected to rise and the population of the Oldham area will not increase significantly.</li> <li>• The housing numbers were based on a Conservative Party manifesto pledge to build 300,000 new homes. However, latest population projections suggest that we do not need that many and so releasing Green Belt in Woodhouses would not be necessary if the Government used the most up to date figures.</li> <li>• Four local estate agents have huge portfolios of affordable houses on the current market. There may not be a need for this development in Woodhouses.</li> </ul>
<b>Green Belt</b>
<ul style="list-style-type: none"> <li>• Woodhouses Green Belt was identified as a strong Green Belt in the 2016 assessment and described as a 'critical gap'.</li> <li>• Questions raised surrounding why the council is putting more land into the Green Belt in Saddleworth. Should not be offsetting green areas from such different parts of GM.</li> <li>• The proposal is an erosion of the Green Belt corridor bordering Oldham and Tameside as there is very little green space between Manchester City Centre and Daisy Nook Country Park.</li> <li>• The proposal will involve the merging of the Failsworth, Hollinwood &amp; Woodhouses boundaries, eroding the unique identity of the individual areas</li> <li>• No documentation is available publicly to support compliance with National Planning Policy Framework; no exceptional circumstances have been demonstrated. A feeling that in practice the inclusion of these sites appears solely about delivering housing targets.</li> <li>• This allocation does not meet any of the site selection criteria.</li> </ul>

<ul style="list-style-type: none"> <li>• Oldham Council has not provided detail of any mitigation it proposes to make against both the loss of the Green Belt and other unintended consequences of development.</li> <li>• Why is Oldham increasing Green Belt sites when others districts are reducing theirs. The need should be reduced based on the new figures.</li> </ul>
<p><b>Brownfield</b></p>
<ul style="list-style-type: none"> <li>• Many disagree with any Green Belt release, it should be brownfield first. Even though it will cost more it would improve the area, for example developing the unused mills.</li> <li>• Respondents state that before any Green Belt land is allocated for development, further analysis is required of the extent to which brownfield sites exist. There has not been a proper assessment of alternative sites.</li> </ul>
<p><b>Transport – Highways / Public Transport / Cycling / Walking</b></p>
<ul style="list-style-type: none"> <li>• There is already too much traffic in Woodhouses. Many people drive over the speed limit, which makes crossing the roads dangerous.</li> <li>• Traffic calming measures have had to be passed by the council.</li> <li>• Requirement 3 of the allocation says there will be highways improvements. However, the locations where highways are the most unsuitable, namely Medlock Road, are also the locations where improvements are physically not possible as the road is too narrow.</li> <li>• No potential access points, such as Holt Lane, Marston Close and Leicester Road, are appropriate.</li> <li>• The sites identified are not capable of delivering sustainable development. These sites have limited access, are not well served by public transport, are not in easy walking distance of any train or Metrolink service and are served by a limited bus service.</li> <li>• Public transport is inadequate, the 74 bus has stopped running to the village apart from at rush hour (5 a day), the 159 is once an hour and the Metrolink is 1.7km away. Development here will be car reliant.</li> <li>• The traffic caused by construction companies would further exacerbate the issue.</li> <li>• The red edge allocation should be extended in a westerly direction towards Failsworth Road, so that the proposed access to the development site can be formed from this more suitable point. The development could then be served off a double width public highway and it would have less impact on the traffic flow through Woodhouses Village.</li> <li>• Cycling infrastructure would be impossible on Ashton Road East or Westminster Road; the area cannot support a more complex infrastructure network.</li> </ul>
<p><b>Physical Infrastructure and utilities</b></p>
<ul style="list-style-type: none"> <li>• Sewers and drainage are at capacity and struggling.</li> <li>• Power cuts are frequent due to power surges in area.</li> </ul>
<p><b>Social Infrastructure</b></p>
<ul style="list-style-type: none"> <li>• There is one primary school in the village, which is oversubscribed with no nursery and cannot physically take any more pupils. It would require an expansion of the buildings, but this would come at the expense of outside play area for the pupils.</li> <li>• Failsworth secondary school is at capacity with 15,000 students and the nearest colleges are Ashton or Oldham.</li> <li>• It is difficult to get an appointment now at doctors or dentists. Another 1000 people will make it even harder.</li> <li>• Plans need to be in place to address stretched local services and impacts on infrastructure of the sites with planning permission also being taken into account.</li> </ul>
<p><b>Environmental – Green Infrastructure, Biodiversity, open space</b></p>
<ul style="list-style-type: none"> <li>• Due process to assess environmental impacts has not been undertaken.</li> <li>• Woodhouses is part of the Woodland Spatial Priority Network, which is essential to meeting biodiversity objectives of the wider region.</li> <li>• Concerns expressed that a route will be made available onto this new estate via the road next to the pond. This pond is a hive of activity including the resident Herons.</li> <li>• A diverse array of animal species inhabit the site.</li> </ul>

<ul style="list-style-type: none"> <li>• Concern that as the proposed sites are adjacent to Sites of Biological Importance, they could cause harm to them.</li> <li>• Rights of Way, footpaths and bridleways running through the areas are affected by the proposed development. These need to be protected meaning they can continue to be used by pedestrians, cyclists and horse riders.</li> <li>• There is only one park of substantial size in Failsworth, that being Brookdale Park. These proposals will mean there are fewer places to take walks and residents would have to drive to get to places to improve our own wellbeing.</li> <li>• The area is farmland and should only be built on if biodiversity can also be increased by converting surrounding baron farmland with only horses into community forests.</li> <li>• Tree buffers to be considered to reduce visual impact on the surrounding landscape.</li> <li>• Proposed development will cause more light and noise pollution.</li> </ul>
<p><b>Air Quality</b></p>
<ul style="list-style-type: none"> <li>• Woodhouses already suffers from the noise and pollution from the nearby M60. We need to reduce emissions not raise them.</li> <li>• Woodhouses sites are located within the Climate Change Vulnerability buffer area, as recognised by the Department for Environment, Food and Rural Affairs (DEFRA). It is essential to protect from development with growing concerns of climate change effects.</li> <li>• The addition of more houses and roads directly opposes what the plan says about keeping our air clean and giving our future generations a greener town.</li> </ul>
<p><b>Flood risk</b></p>
<ul style="list-style-type: none"> <li>• An initial flood risk assessment should be implemented before accepting the allocation as the development would have a significant impact on Lords Brook.</li> <li>• The EA flood model does not currently extend into this part of the catchment so the potential risks from this watercourse and any impacts from climate change are unknown. Without this information, the application of the Sequential Test and Exception Test cannot be applied.</li> <li>• The land is marshy, undulating and unsuitable to build on.</li> <li>• There is already a local flooding problem on Medlock Road.</li> </ul>
<p><b>Heritage</b></p>
<ul style="list-style-type: none"> <li>• Woodhouses is a conservation area and a fine example of a linear village and there is a need to preserve the setting and special character of the historic town from this urban sprawl.</li> <li>• Heritage Impact Assessment should be carried out before this moves forward.</li> <li>• Development here will erode the character of the area.</li> </ul>
<p><b>Other</b></p>
<ul style="list-style-type: none"> <li>• This will remove the last working farm in Failsworth on bottom field farm which teaches children to ride horses.</li> <li>• The area is loved for its proximity to a city centre, yet semi-rural. Semi-rural is an important part of our great region.</li> <li>• Criticism of the consultation process.</li> <li>• Mental health and wellbeing should be a priority of local councils. It was The destruction of Green Belt land would create further stresses and mental health.</li> <li>• Some submissions were received for other sites in Woodhouses as being available for development.</li> <li>• A number of landowners responded to support the allocation.</li> <li>• It was suggested that the land would be better put to use as a country park.</li> </ul>
<p><b>Response to comments:</b></p> <p>The Woodhouses Cluster has been reduced from around to 260 homes across three parcels to around 30 homes on land at Bottom Field Farm. The other two parcels have been removed and are not proposed as part of the strategic allocation in GMSF 2020. Further details will be available in the allocation's topic paper.</p>

**Principle / scale of development:**

The site selection paper identifies that Bottom Field Farm (Woodhouses) meets the following site selection criteria:

- **Criterion 5** - as the site is previously developed land and is capable of providing family housing, including affordable housing to diversify the local housing stock and meet local needs, whilst regenerating previously developed land; and
- **Criterion 7** - is capable of providing family housing, including affordable housing to diversify the local housing stock and meet local needs.

In terms of the GMSF Spatial Strategy and Strategic Objectives, Bottom Field Farm (Woodhouses) is capable of delivering around 30 houses, with a mix of dwelling types and sizes to deliver more inclusive neighbourhoods and meet local needs. As such the allocation contributes to the spatial objective of boosting Northern Competitiveness, within the boroughs of Bolton, Bury, Oldham, Rochdale, Tameside, Wigan and west Salford, through contributing to meeting the housing need across Oldham.

**Housing (inc affordable housing):**

The housing methodology is covered in the Housing Background Paper.

The Housing Background Paper sets out Greater Manchester's Housing Need, including how each district will meet their own housing need and the collective need of GM. It sets out the proposed methodology for meeting this need across the 10 districts and how this is intended to be delivered in line with the objectives of the plan as a whole. Oldham's current Local Housing Need (LHN) based on the government's standard methodology is for 692 new homes per year. The GMSF 2020 sets out a proposed housing requirement for Oldham of 693 new homes per year, based on the government's standard methodology and the methodology set out in the Housing Background Paper.

Compared to the GMSF 2019, Oldham's housing need, as set out in the GMSF 2020, has been reduced from 106% of our LHN to 100% of our LHN. This is to ensure Oldham meets its local housing need, whilst protecting as much Green Belt land as possible.

The allocation policy states that any development will be required to provide a range of dwelling types and sizes, to deliver inclusive neighbourhoods and meet local needs, including a mix of high-quality family housing. It is considered the site has the potential to contribute to meeting local housing need in the immediate vicinity and across the borough and contribute to and enhance the housing mix within the area, adding to the type and range of housing available. The location of the site, within a strong housing market area, provides the potential for a range of high-quality housing in an attractive and accessible location.

In the 2020 GMSF, Chapter 7 'Homes for Greater Manchester' and Policy GM- H2 sets out the approach to affordable housing across GM and supports the provision of affordable housing, either on or off-site, as part of new development, with locally appropriate requirements being set by each local authority. The allocation policy states that the development will be required to provide for affordable homes in line with local planning policy requirements. A Housing Strategy and Local Housing Needs Assessment has been prepared by Oldham Council which will inform Local Plan affordable housing policy.

**Green Belt:**

A Green Belt Harm Assessment has been carried out to inform preparation of the GMSF. The case for exceptional circumstances relating to Bottom Field Farm will be set out in the allocation's topic paper.

There has been a significant reduction in proposed Green Belt release within Oldham, with approximately 50% less Green Belt proposed for release in GMSF 2020 compared to GMSF 2019. The GMSF 2019 released 363.7ha of Green Belt. GMSF 2020 proposes to release around 188ha of Green Belt.

The 2020 allocation policy requires development of the site to contribute towards green infrastructure enhancement opportunities in the surrounding Green Belt as identified in the Identification of Opportunities to Enhance the Beneficial Use of the Green Belt assessment.

**Brownfield:**

Since the GMSF 2019, Oldham Council has carried out a comprehensive and robust review of the borough's housing land supply, significantly increasing the housing land supply within the urban area. This including emerging findings from our draft Mill Strategy, the recently completed Retail and Leisure Study and the council's aspiration for Oldham Town Centre as part of Creating a Better Place.

There are a number vacant and / or under-utilised employment sites included in Oldham's baseline housing land supply, which have been identified as having potential for residential development at some point in the future. Many of these are active employment sites or sites last used for employment purposes, such as Hartford Mill and Maple Mill. The current housing land supply position will be available as part of the evidence to support GMSF 2020.

The GMSF adopts a 'brownfield preference' policy and sets out how we (the GMCA and the ten GM districts) will do all that we can to make sure that our brownfield sites comes forward in the early part of the plan period. To do this we need to continue to press Government for support to remediate contaminated land, to provide funding for infrastructure and to support alternative models of housing delivery. However, this additional housing land identified is still not enough to meet our local housing need. Therefore, whilst we understand the significant concerns the local community has expressed in the previous consultations regarding the proposed strategic allocations there is still a need to release land from the Green Belt for future development.

**Transport - Highways / Public Transport / Cycling / Walking:**

Transport for Greater Manchester (TfGM) appointed consultants to undertake locality assessments for each of the proposed strategic allocations. The locality assessments have considered access to the site and identified mitigation measures needed to minimise the impact of the proposed development on the local highway network, the strategic highway network (where appropriate), and multi-modal access (including public transport, cycling and walking). As part of identifying necessary local highway mitigation measures consideration has been to the cumulative impact of this site and other proposed strategic allocations within the area as appropriate.

The modelling used in the assessments is a 'worst case' scenario as it does not take full account of the extensive opportunities for active travel and public transport improvements

in the local area. The site allocation access arrangements have been developed to illustrate that there is a practical option for site allocation access in this location and to develop indicative cost estimations. Detailed design's consistent with Greater Manchester's best practice Streets for All highway design principles will be required at planning application stage.

The allocation policy sets out that development of the site will be required to provide for appropriate access to and from the site in liaison with the local highways authority and take account of and deliver any other improvements that may be needed so as to minimise the impact of associated traffic on the surrounding areas and roads, including off-site highways improvements, high-quality walking and cycling infrastructure and public transport facilities such as waiting facilities at bus stops near the site.

**Physical Infrastructure and utilities:**

Policy GM E1 Sustainable Places of the 2020 GMSF sets out a series of criteria relation to design and the delivery of the attractive places, including a requirement that new development to be supported by critical infrastructure, such as energy, water and drainage and green spaces.

**Social Infrastructure:**

It is important to ensure that any development proposed does not place undue pressure on existing social infrastructure and takes account of the increased demand it may place on existing provision. The allocation policy therefore outlines that as part of the development, developers will be required to contribute to additional school places, and appropriate health facilities and community facilities, where appropriate and in liaison with the local authority.

In addition to the requirements set out in the 2020 allocation policy:

- Policy GM-E 5 Education of the 2020 GMSF states that significant enhancements in education, skills and knowledge will be promoted throughout Greater Manchester by enabling the delivery of new and improved education, skills and knowledge for all ages and the delivery of sufficient school places to respond to the demands from new housing.
- Policy GM-E 6 Health of the 2020 GMSF states that new development will be required to maximise its positive contribution to health and well-being through the submission of Health Impact Assessments for all development proposals which require an Environmental Impact Assessment. Improvements in health facilities will be supported, by requiring, where appropriate, the provision of new or improved health facilities as part of new developments that would significantly increase demand.

**Environmental – Green Infrastructure, Biodiversity, open space:**

A Preliminary Ecological Appraisal has been carried out by Greater Manchester Ecology Unit for this site to inform the GMSF. The appraisal identifies ecological features onsite, the extent to which development of the site would impact on these features, and the mitigation required. This has informed the allocation policy.

The 2020 allocation policy sets out that development of the site is required to:

- Deliver multi-functional green infrastructure and high-quality landscaping within the site and around the main development areas, so as to minimise the visual impact on the wider landscape, mitigate its environmental impacts, and enhance linkages with the neighbouring communities and countryside and provide opportunities for leisure and recreation;
- Retain and enhance the hierarchy of biodiversity within the site, following the mitigation hierarchy and deliver a meaningful and measurable net gain in biodiversity integrating them as part of a multi-functional green infrastructure network with the wider environment;
- Provide further surveys and assessments on bats, great crested newts and barn owls to inform planning applications;
- Retain and enhance existing Public Rights of Way running through the site, integrating them as part of the multi-functional green infrastructure network, so as to encourage active travel and improve connections and access to adjoining communities and countryside;
- Provide for new and/or improvement of existing open space, sport and recreation facilities, commensurate with the demand generated and local surpluses and deficiencies, in line with local planning policy requirements; and
- Contribute towards green infrastructure enhancement opportunities in the surrounding Green Belt as identified in the Identification of Opportunities to Enhance the Beneficial Use of the Green Belt assessment.

The 2020 allocation policy also states that development of the site will be required to provide for new and/or improvement of existing open space, sport and recreation facilities commensurate with the demand generated and local surplus' and deficiencies, in line with local planning policy requirements.

#### **Air Quality:**

Air Quality is covered by Policy GM-S 6 Clean Air of the 2020 GMSF which sets out a range of measures to support air quality. Government has directed Greater Manchester to produce a Clean Air Plan. The ten districts have chosen to do this collectively. In March 2019 the GM Authorities determined the best performing option to reduce NO<sub>2</sub> across GM and agreed the submission of the Outline Business Case (OBC) to Government. A public consultation on the draft Clean Air Plan will be carried out in October/November 2020.

#### **Flood Risk:**

A Level 1 Strategic Flood Risk Assessment has been carried out to inform the GMSF and the proposed strategic allocations, including Bottom Field Farm (Woodhouses). The SFRA mapped the allocation's flood risk, identified mitigation measures that may be appropriate and informed the allocation policy wording. The allocation boundary has been amended to move the developable area from those areas at greater risk of flooding along the eastern boundary of the site.

The 2020 allocation policy sets out that development of the allocation should be informed by an appropriate flood risk assessment and a comprehensive drainage strategy which includes a full investigation of the surface water hierarchy. The strategy should include details of full surface water management throughout the site as part of the proposed green

and blue infrastructure. Development should deliver any appropriate recommendations, including mitigation measures and the incorporation of sustainable drainage systems as part of the multi-functional green infrastructure network and be in line with the GM Level 1 Strategic Flood Risk Assessment (SFRA) advice. Opportunities to use natural flood management and highway SUDs features should be explored.

**Heritage:**

Oldham Council has prepared a Heritage Impact Assessment (HIA) for each of its strategic allocations to inform the GMSF. The outputs of which have informed the policy wording for this allocation. The allocation policy sets out that development will be required to conserve and enhance heritage assets and their setting in accordance with the findings and recommendations of the Historic Environment Assessment (2020). An up-to-date Heritage Impact Assessment will be required for any planning applications. The assessment concluded that development should be in keeping with the local character of Woodhouses in terms of materials, design and landscaping.

**Other:**

Consultation on the 2019 GMSF was an informal consultation. As such, the GMCA has fulfilled its objectives to consultation. The ten authorities of Greater Manchester carried out consultation in line with their requirements as set out in their district's Statement of Community Involvement (SCI). Oldham has fulfilled its commitments as set out within its SCI. The full 2019 consultation report is available at [www.greatermanchester-ca.gov.uk/what-we-do/housing/greater-manchester-spatial-framework](http://www.greatermanchester-ca.gov.uk/what-we-do/housing/greater-manchester-spatial-framework).

Please see GMSF 2020 for the full allocation policy wording and reasoned justification.



**Further comments on the overall proposals for Oldham, including strategic transport interventions (253 comments)**

<p><b>Principle / scale of development</b></p>
<ul style="list-style-type: none"> <li>• In spite of all the rhetoric and hyperbole that the loss of Green Belt GM wide has been halved, this has not been the case for Oldham, with Council Leaders adding new sites and largely releasing the same green belt but (in the short term) proposing to build less homes on them. The split is still disproportionate with Chadderton, Royton and Shaw bearing the brunt of the release.</li> <li>• To their great discredit Oldham is still proposing 4000 homes be built on green belt, executive homes which are not needed nor wanted by Communities they so badly effect.</li> <li>• The development around Stakehill will have a laerge negative impact on north Chadderton including the park, canal, schools and houses that currently look over the Pennines these views will be ruined by massive industrial units which will be hugely out of scale and context with the cottages and small farm building in and around Chadderton Fold.</li> <li>• Smaller pockets of housing and economic development. These are much preferred solutions than larger developments that will have significant impacts on the current surrounding areas.</li> <li>• the number and size of these proposed developments are too much for a small town such as Shaw to bear</li> </ul>
<p><b>Housing (inc affordable housing)</b></p>
<ul style="list-style-type: none"> <li>• Oldham is disproportionally taking the strain of additional housing needs. In particular there is a disproportionate allocation of land to north west of the borough. Whilst Saddleworth has been left untouched.</li> <li>• There is a need to demolish poor quality housing.and provide low cost housing on brownfield sites rather than these proposals that focus on affluent people who can afford to live in rural areas.</li> <li>• The housing being put forward by developers are 3/4 &amp; 5 bed-roomed houses - these aren't affordable/social home for the community</li> <li>• High density housing is likely to increase mental health problems and there is a need to build attractive apartments or bungalows so elderly people have a chance to release their bigger houses.</li> <li>• In the light of the latest SHLAA there is no case to release these sites for development until after 2023. The land supply in the SHLAA for 2018 to 2023 is sufficient to meet housing need especially as the wrong ONS figure used</li> <li>• First Choice Home are concerned that the rate of delivery in recent years has been insufficient to deliver even the more modest target particularly in Oldham.</li> <li>• It is disappointing that the housing targets (down 7% per annum) and the land allocations have been reduced in the face of opposition</li> </ul>
<p><b>Employment and Economy</b></p>
<ul style="list-style-type: none"> <li>• Distribution centres will employ few people</li> <li>• Relocate industrial units around Chadderton district Centre, creating space for housing. There are plenty of employment units to let in this area.</li> </ul>
<p><b>Green Belt</b></p>
<ul style="list-style-type: none"> <li>• Disagree with development on green belt and on open land. It will destroy the local area. Green Belt should be treasured.</li> </ul>

- Green Belt is there to prevent urban sprawl, provide outdoor amenities, promote biodiversity.
- Far too much green belt is proposed to be released. It will not provide the right jobs or the right houses
- It was argued that the Greater Manchester Green Belt plan no longer serves the Green Belt purposes set out in paragraph 134 of National Planning Policy Framework. The GMSF must therefore take this opportunity to address those issues or make it explicit that non strategic plans should be allowed to be changed in non strategic plans such as local plans and neighbourhood plan.
- The proposal to increase Green Belt boundaries in certain areas, in return for allowing its reduction in others is argued to be completely wrong

### **Brownfield**

- There are plenty of brownfield sites available that could be regenerated Brownfield sites are being left to decay, create eye sores, antisocial behaviour and are dangerous.
- Protest walks demonstrate feelings towards development on Green Belt land.
- There is support for the regeneration of Oldham town centre.
- Lack of imagination in the Housing Strategy. For example, it is suggested that as mills are protected and cannot be demolished that they could be made into apartments and make a feature out of them giving something unique to Oldham.

### **Transport – Highways / Public Transport / Cycling / Walking**

- Roads are congested and cannot take any more traffic, including Medlock Rd (Woodhouses), Shaw, Greenfield and it is felt that cycle lanes and new Metrolink stops will not solve congestion issues.
- Strategic transport interventions are inadequate, Metrolink is unreliable and overcrowded and roads are of poor quality and too narrow.
- People will not want to come and live in new homes when the roads are so overcrowded so the Green Belt will have been sacrificed in vain.
- Increased traffic will lead to an increase in air pollution and related illness and death
- Oldham generally isn't well connected to anywhere. It's not that close to the motorway without using roads that are too small for HGVs, Metrolink is an unreliable franchise and does not cover all the borough.
- The extra Metrolink stop that has been mentioned in the plans hasn't even been granted funding, when asked about it at the consultation meetings it was mentioned that funding would only be approved if the housing was agreed.
- Oldham needs to take active transport - walking and cycling - seriously and deliver a proper joined up network to allow people to get around without using their cars.
- Development of this site would be required to deliver a new Metrolink stop on the Rochdale to Manchester Metrolink line near Cop Road. This would not be attractive for workers travelling from Rochdale, Newhey, Milnrow and Shaw areas to Manchester City Centre as yet another stop would lengthen the journey travelling time from home to their destination even more
- The Oldham area is markedly less developed than other more congested and polluted areas of Greater Manchester and can absorb the associated higher levels of transport density.

<p><b>Physical infrastructure</b></p> <ul style="list-style-type: none"> <li>• Mains tap water and foul sewage system particularly in Rushcroft area of High Crompton hydraulically inadequate will not support or sustain the additional residential properties proposed by the GMSF.</li> <li>• We question the need to build more industrial units when there are so many new units in the area still up for let .</li> <li>• There is some agreement with the extension of the Kingsway business park.</li> </ul>
<p><b>Social Infrastructure</b></p> <ul style="list-style-type: none"> <li>• Infrastructure such as schools are over subscribed, health centres, doctors, dentists, hospitals are lacking as are services such as fire service, council services</li> <li>• There is insufficient policing and crime rates particularly around Woodhouses and Failsworth is an issue.</li> <li>• It is unclear as to who will fund the infrastructure.</li> <li>• The proposed plans would put too much pressure on existing infrastructure especially health, education, roads and increase air pollution</li> </ul>
<p><b>Environmental – Green Infrastructure, Biodiversity, open space</b></p> <ul style="list-style-type: none"> <li>• Concern about loss of wildlife and the destruction of beautiful green spaces and not enough work is being done on environmental and cultural impact.</li> <li>• There is so much evidence of ill health and deprivation associated with the lack of green spaces in towns and cities. A recent report from the UN has said that loss of biodiversity could lead to the extinction of the human race and that the tipping point is not so far away, if the loss continues.</li> <li>• these green corridors with marginalised farms could be converted to forests as part of north/south forest plans increasing biodiversity and still have new housing.</li> </ul>
<p><b>Air Quality</b></p> <ul style="list-style-type: none"> <li>• There is concern about air pollution especially in light of increased traffic..</li> <li>• Monitoring has shown that Shaw residents are already suffering dangerous levels of Nitrogen Dioxide from the M62 and surrounding roads.</li> <li>• Development of such an industrial site locally will have negative impact on the health of local people The incidence and prevalence of respiratory disease such as Asthma, Chronic Obstructive Pulmonary Disease and Pulmonary Fibrosis is increasing in Oldham</li> </ul>
<p><b>Other</b></p> <ul style="list-style-type: none"> <li>• It was argued that there has been a failure of the GMCA to address any of the concerns identified by the first consultation for the area</li> <li>• Suggestion for community liaison committee set up so the voice of the community can be heard.</li> </ul>
<p><b>Response to comments:</b></p> <p><b>Principle / scale of development:</b></p> <p>There has been a significant reduction in proposed Green Belt release within Oldham, with approximately 50% less Green Belt proposed for release in GMSF 2020 compared to the GMSF 2019. The GMSF 2019 released 363.7ha of Green Belt. GMSF 2020 proposes to release around 188ha of Green Belt.</p>

With reference to development around Stakehill, the allocation policy wording states that development will be required to have regard to views from Tandle Hill Country Park in terms of the design, landscaping and boundary treatment in order to minimise the visual impact as much as possible.

**Housing (inc affordable housing):**

The housing methodology is covered in the Housing Background Paper.

The Housing Background Paper sets out Greater Manchester's Housing Need, including how each district will meet their own housing need and the collective need of GM. Compared to the GMSF 2019, Oldham's housing need, as set out in the GMSF 2020, has been reduced from 106% of our LHN to 100% of our LHN. This is to ensure Oldham meets its local housing need, whilst protecting as much Green Belt land as possible.

The allocation policies require development to provide a range of dwelling types and sizes to deliver inclusive neighbourhoods and meet local needs, including a mix of high-quality family housing. The site has the potential to meet local housing need in the immediate vicinity and across the borough and contribute to and enhance the housing mix within the area through adding to the type and range of housing available.

In the 2020 GMSF, Chapter 7 'Homes for Greater Manchester' and Policy GM- H2 sets out the approach to affordable housing across GM and supports the provision of affordable housing, either on or off-site, as part of new development, with locally appropriate requirements being set by each local authority. The allocation policies state that development will be required to provide for affordable homes in line with local planning policy requirements. A Housing Strategy and Local Housing Needs Assessment has been prepared by Oldham Council which will inform Local Plan affordable housing policy.

**Economy and employment:**

Chapter 6 'A Prosperous Greater Manchester' of the 2020 GMSF sets out the approach to employment and skills across Greater Manchester, in that the plan will contribute to enhancing the supply of employment opportunities at a variety of skill levels throughout Greater Manchester to achieve more inclusive growth. Policy GM-P 2 sets out that a diverse range of employment sites and premises, both new and second hand, will be made available across Greater Manchester in terms of location, scale, type and cost. This will offer opportunities for all kinds and sizes of businesses, including start-ups, firms seeking to expand, and large-scale inward investment.

**Green Belt:**

The case for exceptional circumstances for the Green Belt proposals as a whole is set out in the accompanying Green Belt Topic Paper.

**Brownfield:**

Since the GMSF 2019, Oldham Council has carried out a comprehensive and robust review of the borough's housing land supply, significantly increasing the housing land supply within the urban area. This including emerging findings from our draft Mill Strategy, the recently completed Retail and Leisure Study and the council's aspiration for Oldham Town Centre as part of Creating a Better Place. The current housing land supply position will be available as part of the evidence to support GMSF 2020.

The GMSF adopts a 'brownfield preference' policy and sets out how we (the GMCA and the ten GM districts) will do all that we can to make sure that our brownfield sites comes forward in the early part of the plan period. To do this we need to continue to press Government for support to remediate contaminated land, to provide funding for infrastructure and to support alternative models of housing delivery. However, this additional housing land identified is still not enough to meet our local housing need. Therefore, whilst we understand the significant concerns the local community has expressed in the previous consultations regarding the proposed strategic allocations there is still a need to release land from the Green Belt for future development.

### **Transport – Highways / Public Transport / Cycling / Walking**

The Greater Manchester Transport Strategy 2040 supported by a 5-Year Delivery Plan sits alongside GMSF 2020 and sets out the immediate and longer-term programme for transport interventions needed to support sustainable growth. The 2040 5-Year Delivery Plan will also be used to incorporate the strategic transport interventions needed for the new GMSF growth allocations into Greater Manchester's wider programme and funding requirements. The 2040 5-Year Delivery Plan is the framework for transport investment, across Greater Manchester, required to support growth throughout the GMSF plan period and as such should be read alongside this chapter.

Locality assessments prepared as part of the transport evidence to inform GMSF 2020 have identified mitigation measures needed to minimise the impact of the proposed development on the local highway network, the strategic highway network (where appropriate), and opportunities for multi-modal access (including public transport, cycling and walking).

### **Physical Infrastructure:**

Policy GM E1 Sustainable Places of the 2020 GMSF sets out a series of criteria relation to design and the delivery of the attractive places, including a requirement that new development to be supported by critical infrastructure, such as energy, water and drainage and green spaces.

### **Social Infrastructure:**

It is important to ensure that any development proposed does not place undue pressure on existing social infrastructure and takes account of the increased demand it may place on existing provision. Allocation policy wording requires development to contribute to additional school places, and appropriate health facilities and community facilities, where appropriate and in liaison with the local authority.

In addition:

- Policy GM-E 5 Education of the 2020 GMSF states that significant enhancements in education, skills and knowledge will be promoted throughout Greater Manchester by enabling the delivery of new and improved education, skills and knowledge for all ages and the delivery of sufficient school places to respond to the demands from new housing.
- Policy GM-E 6 Health of the 2020 GMSF states that new development will be required to maximise its positive contribution to health and well-being through the submission of Health Impact Assessments for all development proposals which require an Environmental Impact Assessment. Improvements in health facilities will

be supported, by requiring, where appropriate, the provision of new or improved health facilities as part of new developments that would significantly increase demand.

**Environmental – Green Infrastructure, Biodiversity, open space**

Chapter 8 A Greener Greater Manchester of the 2020 GMSF sets out the approach to Green Infrastructure, landscape and biodiversity. Allocation policy wording sets out requirements relating to individual allocations.

**Air Quality:**

Air Quality is covered by Policy GM-S 6 Clean Air of the 2020GMSF which sets out a range of measures to support air quality. Government has directed Greater Manchester to produce a Clean Air Plan. The ten districts have chosen to do this collectively. In March 2019 the GM Authorities determined the best performing option to reduce NO2 across GM and agreed the submission of the Outline Business Case (OBC) to Government. A public consultation on the draft Clean Air Plan will be carried out in October/November 2020.

### 3.2.6. Strategic Allocations in Rochdale

There are 7 allocations in Rochdale. There were 2,942 comments received in relation to the Rochdale allocations.

#### **GM Allocation 23: Bamford and Norden** (411 comments)

Support for the allocation was received from some residents who stated this area has suffered from a lack of housing provision for young professionals, especially with families, which has driven people away from the area.. Many residents raised the issue of whether the site is available for development with claims that it was not due to over 2 thirds being in private ownership. These owners have publically stated that they are not willing to sell the land for development.

There were concerns raised with regards to existing heavy congestion, particularly during peak times, on the roads in Bamford and Norden, especially on Norden Road and Bury Road.

The sustainability of the site has been questioned due to poor public transport links.and concerns regarding the lack of existing local facilities and social infrastructure in this area including such things as community centres, libraries and parks.

The issue of air pollution was a concern for many residents. A section of Bury Road falls within an Air Quality Management Area and already exceeds air pollution guidelines.

The amendment to the allocation, to remove the playing fields, is a welcome and helpful change. The football and cricket facilities provided on the Green Belt are an invaluable asset of the community and should not be lost for ever. However there were a lot of objections regarding the impact on the existing sports facilities such as Bamford Fieldhouse Cricket and Tennis Club and the football pitches, with concern that 450 homes will not realistically fit on the site without development / loss of the playing fields.

<b>Principle / scale of development</b>
<ul style="list-style-type: none"> <li>• The proposed site is not sustainable and does not fit the vision or objectives of the GMSF.</li> <li>• The proposed site is not wholly available for development, as farmers who have publically stated they will not sell for development own a large part.</li> </ul>
<b>Housing (inc affordable housing)</b>
<ul style="list-style-type: none"> <li>• This area has suffered from a lack of housing provision for young professionals, especially with families, which has driven people away from the area. A balanced development of good quality homes adjacent to green space in Bamford is long overdue and would bring people into the area.</li> <li>• Many residents raised concerns that the site will only provide high value housing and no affordable or older persons housing, of which there is a shortage in this area. It is assumed that Rochdale is proposing high value housing to benefit financially from higher council tax rates. There is no evidence indicating a need for high value housing in this area.</li> <li>• Disagree with how the Local Housing Need has been calculated and with Rochdale's housing target being higher than its Local Housing Need.</li> </ul>
<b>Employment and Economy</b>

<ul style="list-style-type: none"> <li>• The GMSF needs a policy of building on smaller brownfield sites first which would benefit local smaller house builders and boost the local economy.</li> </ul>
<p><b>Green Belt</b></p> <ul style="list-style-type: none"> <li>• Exceptional Circumstances have not been demonstrated to remove land from the Green Belt and no Green Belt review has taken place.</li> <li>• This proposal will lead to urban sprawl.</li> <li>• The plan is not in line with the Greater Manchester mayors statement of ‘no net Green Belt loss’. The proposed Green Belt addition does not justify the release of Green Belt for development.</li> </ul>
<p><b>Brownfield</b></p> <ul style="list-style-type: none"> <li>• There are many brownfield sites available; these should be developed instead of Green Belt.</li> <li>• There are around 20 hectares of brownfield land not included on Rochdale’s Brownfield Land Register. They need to be added urgently.</li> </ul>
<p><b>Transport – Highways / Public Transport / Cycling / Walking</b></p> <ul style="list-style-type: none"> <li>• Many residents raised concerns about the existing heavy congestion on the roads in Bamford and Norden. Especially Norden Road and Bury Road. The proposed development will result in an assumed increase of 900 – 1200 cars on these roads making the congestion much worse.</li> <li>• Currently a poor public transport service in this area. Poor bus service that cannot cope with any increased demand and no Metrolink service nearby. The potential raid bus link to the city centre will not go far enough to relieve and reduce congestion, as most people will still commute by car.</li> <li>• Any proposed transport improvements, including those highlighted in the Transport for Greater Manchester 2020-25 draft delivery plan, will not be delivered in time to negate the negative impact on this development.</li> </ul>
<p><b>Physical Infrastructure and utilities</b></p> <ul style="list-style-type: none"> <li>• Significant Development will cause issues with the existing sewers, drainage and run off systems, which will not cope with increased demand. They have not been upgraded for 50 years.</li> <li>• Several electricity pylons and overhead high voltage power lines bisect the site. This reduces the developable area, as you cannot build close to /under these. Concerns were raised over the risk of living next to these electricity pylons should the development go ahead, including the increased risk of getting cancer.</li> </ul>
<p><b>Social Infrastructure</b></p> <ul style="list-style-type: none"> <li>• The doctors, hospitals and dentists are all oversubscribed with long wait times for appointments.</li> <li>• Both primary and secondary schools are oversubscribed with long waiting lists and no room for expansions.</li> <li>• There are no existing local facilities in this area such as community centres, libraries and parks.</li> <li>• There are not enough police officers in this area with crime rates rising.</li> </ul>
<p><b>Environmental – Green Infrastructure, Biodiversity, open space</b></p>



<ul style="list-style-type: none"> <li>• The development will have a significant negative impact on biodiversity and existing wildlife on the site, such as wild deer, bats, foxes, birds and other vulnerable species.</li> <li>• The site contains mature trees and several miles of ancient hedgerows which have been established over a 100 years.</li> <li>• Development will have a negative impact on existing footpaths and bridleways used by many residents and local walking group 'Wednesday Walkers Oldham'.</li> <li>• The nearest park is 1.5km away. This is the only green space in Bamford and its loss will deprive residents of a place to walk, exercise, play and socialise.</li> <li>• Any development should ensure that some greenery is maintained between the new and existing houses. Further the site boundary comes too close to the edge of Ashworth Valley. It should be reduced in size and pulled back at least.</li> <li>• How are you planning to protect the remaining green spaces from further development?</li> </ul>
<p><b>Air Quality</b></p> <ul style="list-style-type: none"> <li>• A section of Bury Road is in an Air Quality Management Area and already exceeds air pollution guidelines. This development and the resulting increased number of cars will increase the level of pollution, affecting people's health.</li> <li>• The existing green space currently works to counter act the negative effects of Carbon Dioxide.</li> </ul>
<p><b>Flood risk</b></p> <ul style="list-style-type: none"> <li>• This land is constantly waterlogged due to a high water table, ponds, springs and brooks on the site.</li> <li>• The site currently suffers from flooding during heavy rainfall.</li> </ul>
<p><b>Heritage</b></p> <ul style="list-style-type: none"> <li>• 5.6% (1.92 hectares) of the site is within 250m of listed buildings, structures or monuments. Bamford Chapel is adjacent to the southernmost tip of the site and is a Grade 2 listed building. Pleased that this will be taken into consideration in the proposal.</li> <li>• Development will result in the destruction and damage of ancient pack-tracks on the site destroying our local industrial heritage.</li> </ul>
<p><b>Other</b></p> <ul style="list-style-type: none"> <li>• The development will have a severe impact on the existing sports facilities Bamford Fieldhouse Cricket and Tennis Club and the football fields. There is concern that the proposed 450 homes will not fit on the site without some loss of these playing fields.</li> <li>• We need to support local farmers, not displace them and build on their land.</li> <li>• Other GMSF sites been removed or scaled back since 2016, but this site has not.</li> <li>• This site does not meet to site selection process as disagreement in does not meet criteria 7. There is also no feasibility study to support the proposal.</li> </ul>
<p><b>Response to Comments</b></p> <p>The site selection paper identifies that Bamford/Norden meets criterion 7.</p> <p>The policy requires the retention and significant enhancement of the existing recreational facilities.</p> <p>The justification for the housing figures are set out Policy GM-H 1 and the supporting background evidence including the GM Strategic Housing Market Assessment 2020. The Local Plan policy deals with the provision of affordable housing. The site also does offer the opportunity to provide larger, higher value properties which are in short supply in the borough.</p>

The case for exceptional circumstances is set out for the Green Belt proposals as a whole and the specific case for this allocation in the accompanying Green Belt Topic Paper.

The GMSF prioritises the use of brownfield land. However it acknowledges that in order to meet the housing and employment needs selective release of Green Belt is necessary.

Transport analysis contained in the locality assessment has identified necessary mitigation to accommodate any additional traffic generated by the proposed allocation. The policy also includes potential to deliver bus rapid transit services.

Objective 9 of the GMSF seeks to ensure that new development is properly served by social and physical infrastructure including schools, health, social care, sports and recreation facilities. The policy seeks contributions to ensure sufficient school places.

Policy GM-G 9 covers the concept of net gain with respects to Green Infrastructure and biodiversity.

The Integrated Appraisal (IA) identifies that the allocation is within 150m of an existing AQMA. The policy for the allocation incorporates wording that aligns with the mitigation suggested in the IA.

The site has been covered by the GM Strategic Flood Risk Assessment which has considered all the allocations in respect of flood risk and water management and no significant issues have been identified.

The policy includes the need to ensure the design of the scheme preserves and enhances the setting of the listed Bamford Chapel to the south of the site. Heritage and archaeological screening has been undertaken by the University of Salford Archaeology Team.

Other concerns raised by consultees are covered by the allocations policy, other GMSF policies or Local Plan policies.

**GM Allocation 24: Castleton Sidings (103 comments)**

There was general overall support for the redevelopment of this site. This was largely due to it being a brownfield site and in a sustainable location. Some respondents have noted how Castleton as an area had declined and is in need of regeneration. It is considered that development of this site may help in contributing to the regeneration of Castleton and addressing some of these issues.

Objections were received to the release of Green Belt land. Some residents felt that additional housing is not needed in this area and the proposed site should remain as Green Belt. Concerns were raised that the loss of Green Belt will contribute to rising air pollution levels.

It has been assumed that the proposed housing will result in a large increase in traffic and many respondents raised concerns the current road network would be unable to support this increase. However if the proposal included improvements to the road network and transport links then that would be supported as these improvements are needed. Comments regarding cycling were limited however there was some reservation on how a cycle lane would further decrease traffic capacity. Equally, cycle lanes were also viewed as a positive addition

It was considered that the site is in a sustainable location, but the impact on local services needs to be addressed. Local services such as doctors, dentists and schools are over-subscribed with long wait times to get appointments and a shortfall in school places. These services cannot cope with increased pressure from additional housing.

<b>Principle / scale of development</b>
<ul style="list-style-type: none"> <li>• This is considered to be a good use of brownfield land and there is support for the proposals to be implemented.</li> <li>• This is a sustainable location, close to the village centre, and considered appropriate for development.</li> </ul>
<b>Housing (inc affordable housing)</b>
<ul style="list-style-type: none"> <li>• Any housing on this site needs to be well thought out and suitable for the area.</li> <li>• There is already plenty of housing available in this area and therefore no need for any more to be built.</li> </ul>
<b>Employment and Economy</b>
<ul style="list-style-type: none"> <li>• There is scope for this site to be partly used as employment.</li> <li>• Better transport links in the area will increase opportunities for employment on these sites.</li> </ul>
<b>Green Belt</b>
<ul style="list-style-type: none"> <li>• No exceptional circumstances have been demonstrated to justify releasing this land from the Green Belt.</li> <li>• Too much Green Belt is being proposed for release across Rochdale. There should be no building on Green Belt land of any kind.</li> </ul>
<b>Brownfield</b>
<ul style="list-style-type: none"> <li>• This proposal is considered to be a good use of brownfield land.</li> <li>• Brownfield sites need to be prioritised for development first before any Green Belt is released.</li> <li>• It does not matter that this land is brownfield. It is still Green Belt land and should not be developed.</li> </ul>

<b>Transport – Highways / Public Transport / Cycling / Walking</b>
<ul style="list-style-type: none"> <li>• This site is in a sustainable location, near to existing transport and rail links. Although some concerns still raised regarding the effects additional housing will have on surrounding infrastructure.</li> <li>• The train service is currently inadequate and in need of improvement.</li> <li>• The infrastructure in this area is already congested. It cannot cope with increased traffic from the proposed housing.</li> <li>• The land should be allocated for a station car park instead of housing.</li> </ul>
<b>Physical Infrastructure and utilities</b>
<ul style="list-style-type: none"> <li>• The development of these houses and any new infrastructure will result in the roads being dug up causing a lot of disruption.</li> </ul>
<b>Social Infrastructure</b>
<ul style="list-style-type: none"> <li>• This is a sustainable location but the impact on local services needs to be addressed. Local services such as doctors, dentists and schools are over-subscribed with long wait times to get appointments and a shortfall in school places.</li> <li>• The village centre is rundown and needs regenerating.</li> <li>• There are no local leisure facilities for residents to use.</li> </ul>
<b>Environmental – Green Infrastructure, Biodiversity, open space</b>
<ul style="list-style-type: none"> <li>• The proposed development will be detrimental to the wildlife on this site, including the wildflowers and birds.</li> <li>• Tree buffers need to be considered as part of any development to reduce the visual impact and noise.</li> </ul>
<b>Air Quality</b>
<ul style="list-style-type: none"> <li>• The air quality levels in this area are already above the recommended limit. Any development, and the associated increased traffic, will increase these levels making the problem much worse.</li> <li>• Green spaces help towards keeping the air clean. Therefore the loss of this Green Belt will contribute to further air pollution and contradicts Greater Manchester's clean air objectives.</li> </ul>
<b>Heritage</b>
<ul style="list-style-type: none"> <li>• The development should not conflict with the heritage railway line.</li> </ul>
<b>Other</b>
<ul style="list-style-type: none"> <li>• No other issues raised</li> </ul>
<b>Response to Comments</b>
<p>The site selection paper identifies that Castleton Sidings meets criteria 1 and 7.</p> <p>The case for exceptional circumstances is set out for the Green Belt proposals as a whole and the specific case for this allocation in the accompanying Green Belt Topic Paper.</p> <p>Transport analysis contained in the locality assessment has identified necessary mitigation to accommodate any additional traffic generated by the proposed allocation.</p>

Objective 9 of the GMSF seeks to ensure that new development is properly served by social and physical infrastructure including schools, health, social care, sports and recreation facilities.

Policy GM-G 9 covers the concept of net gain with respects to Green Infrastructure and biodiversity.

The Integrated Appraisal (IA) identifies that the allocation is within 500m of an existing AQMA. The policy for the allocation incorporates wording that aligns with the mitigation suggested in the IA.

Other concerns raised by consultees are covered by the allocations policy, other GMSF policies or Local Plan policies.

**GM Allocation 25: Crimble Mill** (197 comments)

Support for allocations was received from some residents who stated the extra houses and the leisure facilities will enhance the area. This support was on the basis that additional or upgraded physical and social infrastructure is also put in place to deal with the increased demand. Support was received for the restoration and redevelopment of Crimble Mill and any surrounding brownfield land as it will bring an historic mill building back into use. However many residents believe the mill can be redeveloped without the need to release and develop any of the Green Belt land and disagreed with the proposed capacity of the site feeling it was too high.

A large number of residents are concerned that access to the site will have to be off Crimble Lane. This is not suitable for construction vehicles during development, increased traffic or emergency vehicle access to potential residents. It is a single vehicle lane with no way of making the entrance/exit wider due to existing houses. Concerns were also raised about the existing heavy congestion on the roads surrounding the site. Especially Rochdale Road East (A58) and Barley Hall Street. The proposed development will result in a large increase of cars making the congestion much worse.

The sustainability of the site has been questioned due to poor local services and public transport links. The site only has access to a poor bus service and it is not in close proximity to a railway station or Metrolink stop. The doctors, hospitals and dentists are all oversubscribed with long wait times for appointments. As are both the local primary and secondary schools. Development will directly impact on neighbouring All Souls Primary due to increased traffic, loss of existing grounds used for the forest school and construction work causing disruption.

The All Souls area is built on a double fault. During the construction of houses on the Gort, heavy plant vehicles caused movement in the double fault and caused tremors. The heavy vehicles had to be excluded from the site. Residents are concerned that if heavy plant is used during the proposed development it may be affected by the tremors, which would cause damage to properties.

Many residents objected to the loss of the Green Belt land as it's the last remaining green space in the area, is well used by residents and vital to people's health, especially children. The development will have a negative impact on ecology, biodiversity and existing wildlife on the site, such as wild deer, bats, foxes, nesting birds and other vulnerable species. Part of the site falls within Flood Zone 3 and has recently been subject to major flooding. The rest of the site also currently suffers from flooding during heavy rainfall.

<b>Principle / scale of development</b>
<ul style="list-style-type: none"> <li>• Support the redevelopment of the mill as it will bring an historic building back into use. The extra houses and the leisure facilities will enhance the area.</li> <li>• Support of the redevelopment of the mill and surrounding brownfield land, however object to any development on the Green Belt land.</li> <li>• The viability of the scheme was questioned as the restoration and redevelopment of a dilapidated listed mill would cost too much money.</li> <li>• The scale of development is too large. There is no need/demand for 250 houses in this area.</li> </ul>
<b>Housing (inc affordable housing)</b>
<ul style="list-style-type: none"> <li>• The redevelopment of the mill must be delivered to completion before any of the Green Belt is released for development.</li> </ul>

<ul style="list-style-type: none"> <li>• The site does not include any affordable housing which is much needed in this area. The executive homes proposed will not meet the needs of the area, local people will not be able to afford them.</li> <li>• These houses are not needed, as there are many empty properties for sale that have been on the market for a long time.</li> <li>• Some support received for the site but only based on the capacity being greatly reduced. The site is currently being proposed for over-development.</li> <li>• You should be investing in the current housing stock to make it more appealing.</li> <li>• Disagree with Rochdale's Local Housing Need and the methodology used to calculate it.</li> </ul>
<p><b>Employment and Economy</b></p>
<ul style="list-style-type: none"> <li>• The proposed residential development will not help the local economy or increase employment.</li> <li>• There is a lack of manufacturing opportunities in this area.</li> </ul>
<p><b>Green Belt</b></p>
<ul style="list-style-type: none"> <li>• Object to the loss of Green Belt land. The mill can be redeveloped without the loss of Green Belt land.</li> <li>• The proposed development and loss of Green Belt is contrary to the National Planning Policy Framework. No exceptional circumstances have been demonstrated.</li> <li>• The proposals to add land into the Green Belt is a statistical trick to try and mask the removal of more Green Belt than is being added back in. Queens Park is already protected from development and does not need adding to the Green Belt. Further many residents have little confidence in Green Belt status as protecting land from development, following these proposals.</li> </ul>
<p><b>Brownfield</b></p>
<ul style="list-style-type: none"> <li>• Rochdale has a lot of brownfield field land that should be developed before Green Belt is considered for release.</li> <li>• Government legislation states that councils should exhaust all brownfield sites before considering releasing Green Belt.</li> </ul>
<p><b>Transport – Highways / Public Transport / Cycling / Walking</b></p>
<ul style="list-style-type: none"> <li>• Concern that access to the site will have to be off Crimble Lane. This is not suitable for construction vehicles during development, increased traffic or emergency vehicle access to potential residents. It is also a single vehicle lane with no way of making the entrance/exit wider due to existing houses.</li> <li>• If any development does go ahead, another access route into the site needs to be identified.</li> <li>• Many residents raised concerns about the existing heavy congestion on the roads surrounding the site. Especially Rochdale Road East (A58) and Barley Hall Street. The proposed development will result in a large increase of cars making the congestion much worse. There is also an issue with cars speeding on the local roads, which is a danger to pedestrians.</li> <li>• The site has very poor public transport access. A poor bus service and it is not in close proximity to a railway station or Metrolink stop.</li> <li>• Any supporting road infrastructure needs to be addressed first, before development.</li> <li>• It is desirable that existing bridleways, such as Crimble Lane, are not used as access routes to new housing. If this is unavoidable, a new multi-user Public Right of Way should be constructed as a separate entity from vehicular traffic using the former route to access housing</li> </ul>
<p><b>Physical Infrastructure and utilities</b></p>
<ul style="list-style-type: none"> <li>• The existing physical infrastructure is already over capacity and cannot cope with any new pressures. Any new infrastructure needs to be put in place first, before any development takes place.</li> </ul>

<p><b>Social Infrastructure</b></p> <ul style="list-style-type: none"> <li>• The doctors, hospitals and dentists are all oversubscribed with long wait times for appointments.</li> <li>• Both primary and secondary schools are oversubscribed with long waiting lists.</li> <li>• Development will directly affect neighbouring All Souls Primary School. The traffic here is already unsafe and dangerous for the children. Any extension at will result in loss of existing grounds which will affect the forest school curriculum. The construction work will also create a lot of disruption and impact on the children's education.</li> <li>• All these existing services are on the brink of collapse and cannot cope with any further demand and pressure.</li> <li>• The police and fire services are already overstretched in this area with crime rates rising.</li> </ul>
<p><b>Environmental – Green Infrastructure, Biodiversity, open space</b></p> <ul style="list-style-type: none"> <li>• This land is the last remaining green space in the area and very popular, it is used by dog walkers, cyclists, families walking, children playing and socialising, horse riders and many other local people. This outdoor space is vital to people's health, especially children.</li> <li>• The development will have a negative impact on ecology, biodiversity and existing wildlife on the site.</li> <li>• GM25 Crimble Mill does not recognise the loss of this open space or a requirement for its mitigation. There needs to be a policy requirement for the retention and enhancement of green infrastructure.</li> <li>• The Rochdale Core Strategy notes that there is only 3% of tree coverage around Crimble Mill, which includes many mature trees and significant hedgerows. The further reduction of these would a negative environmental impact.</li> </ul>
<p><b>Air Quality</b></p> <ul style="list-style-type: none"> <li>• Developing open green spaces directly opposes GM policies on keeping our air clean.</li> <li>• Junction 21 has the highest levels of recorded nitrogen dioxide, a further potential 1400 cars will just add to this.</li> <li>• The construction work on site will create a lot of additional pollution next to an existing school, which will affect children's health.</li> </ul>
<p><b>Flood risk</b></p> <ul style="list-style-type: none"> <li>• Part of the site falls within Flood Zone 3 and has recently been subject to major flooding. The rest of the site also currently suffers from flooding during heavy rainfall.</li> <li>• Developing this porous land will result in flooding and direct heavy rainfall to the adjacent flood zone on Queens Park and other areas.</li> <li>• The policy does not mention the inclusion of multifunctional Green Infrastructure or Sustainable Drainage Systems measures for managing surface water runoff. This should be included.</li> </ul>
<p><b>Heritage</b></p> <ul style="list-style-type: none"> <li>• You must ensure that the proposed development on the north side of the River Roch would be restoration work to respect the setting of the Grade 2 listed Crimble Mill.</li> <li>• The mill should be converted into a heritage centre that contains information on the mills and local heritage.</li> </ul>



<p><b>Other</b></p>
<ul style="list-style-type: none"> <li>• Residents concerned with developers. Claims they are not good with consulting and working with residents.</li> <li>• The All Souls area is built on a double fault, which was discovered years ago during the building by Caseys of houses on the Gort. During construction, heavy plant vehicles caused movement in the double fault and caused tremors. The heavy vehicles had to be excluded from the site. If heavy plant is used during the proposed development, it may be affected by the tremors, which would damage to properties. It would also be extremely unwise to build new homes on a fault.</li> </ul>
<p><b>Response to Comments</b></p> <p>The site selection paper identifies that Crimble Mill meets criteria 5 and 7.</p> <p>The justification for the housing figures are set out Policy GM-H 1 and the supporting background evidence including the GM Strategic Housing Market Assessment 2020. The Local Plan policy deals with the provision of affordable housing. The site does offer the opportunity to provide larger, higher value properties which are in short supply in the borough.</p> <p>The case for exceptional circumstances is set out for the Green Belt proposals as a whole and the specific case for this allocation in the accompanying Green Belt Topic Paper.</p> <p>The GMSF prioritises the use of brownfield land. However it acknowledges that in order to meet the housing and employment needs selective release of Green Belt is necessary.</p> <p>Transport analysis contained in the locality assessment has identified necessary mitigation to accommodate any additional traffic generated by the proposed allocation.</p> <p>Objective 9 of the GMSF seeks to ensure that new development is properly served by social and physical infrastructure including schools, health, social care, sports and recreation facilities. The policy seeks contributions to ensure sufficient school places including the provision of land to facilitate the expansion of the adjacent All Souls Primary School.</p> <p>Policy GM-G 9 covers the concept of net gain with respects to Green Infrastructure and biodiversity.</p> <p>The Integrated Appraisal (IA) identifies that the allocation is within 500m of an existing AQMA. The policy for the allocation incorporates wording that aligns with the mitigation suggested in the IA.</p> <p>The site has been covered by the GM Strategic Flood Risk Assessment (SFRA) which has considered all the allocations in respect of flood risk and water management. This site does include an area in flood zone 3, this has been taken account of in the SFRA work and can be dealt with through master planning of the site and by ensuring that the mill building can be accessed by the north.</p> <p>The policy requires improvements to the listed mill complex. Heritage and archaeological screening has been undertaken by the University of Salford Archaeology Team.</p> <p>Other concerns raised by consultees are covered by the allocations policy, other GMSF policies or Local Plan policies.</p>

**GM Allocation 26: Land North of Smithy Bridge.**(599 comments)

Many of the comments were objecting to any development at Smithy Bridge with many respondents concerned that the types of housing proposed were not appropriate for the area. However there was also some support from respondents who felt that this is a good, sustainable site to redevelop. There was support for increasing the housing offering within this area, particularly to include executive housing which is lacking and in demand. Some respondents stated they have had to move out of the area as there was a lack of high quality homes available.

There was a lot of objection to the loss of Green Belt land with more focus needing to be given to developing brownfield land as a priority. There is also concern that the number of houses being allocated for the size of the village is too high and disproportionate and more focus should be on addressing the local housing need, such as affordable and older persons housing, rather than high value housing.

Several respondents objected to the impact on Hollingworth Lake and the bearing it would have on it as a tourist attraction and area of natural beauty. Many respondents felt that the development would negatively impact wildlife, the overall perception of the area as a rural setting and that the enhancement of green and blue infrastructure of the area needs further consideration. Some respondents felt that Hollingworth Lake should be enhanced for tourism purposes and this site could be better utilised to contribute to this, by providing better leisure facilities or further off road parking.

The increased traffic which will result from the development is a key area of concern for many respondents. Many felt the existing road network is inadequate, heavily congested and will not be able to cope with increased demand. The heavy congestion is further exacerbated by the level crossing closing several times each hour. Concerns were raised regarding the emergency vehicle response times for this area already being above the national average and the negative impact further traffic will have on this. Parking for the Lake was also highlighted as problematic, particularly during nice weather, bank holidays and weekends.

There is an existing issue with school places for this area. Many respondents stated that schools were oversubscribed with many children having to travel long distances to attend school. The proposed primary school is welcomed, however there is a particular issue with secondary school places and many respondents felt that this also needs addressing.

<b>Principle / scale of development</b>
<ul style="list-style-type: none"> <li>• This proposal is not in line with Rochdale’s adopted Local Plan which states Green Belt release is not required in the plan period.</li> <li>• The proposed capacity is too high for such a small area.</li> <li>• Some support for high quality housing as it is considered a sustainable location.</li> <li>• Developing on this site in a sympathetic manner is a good idea and would improve the area and offer local benefits.</li> <li>• The scale of the development needs reducing.</li> </ul>
<b>Housing (inc. affordable housing)</b>
<ul style="list-style-type: none"> <li>• Rochdale is already meeting its adopted housing target and therefore does not need to release any Green Belt land.</li> <li>• Disagreement with the way the Local Housing Need has been calculated, especially the use of 2014 projections.</li> <li>• Disagreement with Rochdale being allocated a higher housing target than is required.</li> <li>• The proposed housing does not meet local needs. It does not include much needed affordable or older persons housing.</li> </ul>

<ul style="list-style-type: none"> <li>Local people will not be able to afford the proposed housing and will need to move out of the area.</li> <li>Support for some much needed high quality houses in this area.</li> </ul>
<p><b>Employment and Economy</b></p>
<ul style="list-style-type: none"> <li>The development of this site and loss of the car park will have a detrimental impact the tourism of this area, which will have a significant impact on the local economy such as local businesses who rely on the tourism the lake draws in.</li> <li>There is no proposed employment in the local area.</li> </ul>
<p><b>Green Belt</b></p>
<ul style="list-style-type: none"> <li>This Green Belt separates Smithy Bridge from Littleborough. Its loss will cause the urban areas to merge together.</li> <li>This proposal does not take account of national legislation or policy. Exceptional circumstances have not been demonstrated to remove this land from the Green Belt.</li> <li>The reduction in Green Belt land does not take account of this being accessible land which can be enjoyed by the public.</li> </ul>
<p><b>Brownfield</b></p>
<ul style="list-style-type: none"> <li>There are many available brownfield sites which should be developed before any Green Belt land is released.</li> <li>The proposed site is not in line with the Mayor's approach of focusing on brownfield and Town Centre sites.</li> <li>There are lots of empty properties in Rochdale that should be brought back into use, therefore reducing the housing need.</li> </ul>
<p><b>Transport – Highways / Public Transport / Cycling and walking</b></p>
<ul style="list-style-type: none"> <li>The local roads already suffer from heavy congestion, especially during peak hours. The A58 and roads around the lake are often gridlocked. These roads cannot cope with any increase in traffic resulting from the proposed homes.</li> <li>There is no evidence of any traffic survey being carried out to assess the impact of the new housing on the roads and no solution to the increased traffic resulting from the proposed housing.</li> <li>The level crossing already causes heavy congestion and tailbacks. This will be made much worse with increased traffic.</li> <li>The local train service is inadequate and overcrowded. It will not cope with increased demand from new houses.</li> <li>There are no suitable public transport links to the nearest Metrolink stop.</li> <li>The proposed Rochdale bus priority corridor in the 2040 strategy could extend to Littleborough.</li> <li>The loss of the car park will exacerbate existing on street parking problems.</li> <li>The response times for emergency vehicles to Littleborough is already above the national average. This will only get worse with increased traffic.</li> <li>The proposed development cuts off cycle routes and reduces parking.</li> </ul>
<p><b>Physical Infrastructure and Utilities</b></p>
<ul style="list-style-type: none"> <li>The sewer, drainage and water systems are already in need of urgent renovation and upgrading.</li> <li>This additional housing will put significant pressure on the power grid.</li> </ul>
<p><b>Social Infrastructure</b></p>
<ul style="list-style-type: none"> <li>Local services are already overstretched. Doctors, dentists and hospitals are all oversubscribed with long wait times for appointments.</li> <li>Local primary and secondary schools are oversubscribed with a shortfall in places and local children unable to secure places.</li> <li>Proposals for a new primary school welcomed. However still concern for the lack secondary school places.</li> </ul>

<ul style="list-style-type: none"> <li>The proposed new school is located on a dangerous bend where there is already a record of traffic incidents.</li> </ul>
<p><b>Environmental – Green Infrastructure / Biodiversity and Open Space</b></p> <ul style="list-style-type: none"> <li>Many residents, including children, use this area of greenspace for walking, recreation and exercise helping to improve both physical and mental health. Its loss would be detrimental to resident’s wellbeing.</li> <li>Hollingworth Lake should be enhanced as a tourist attraction rather than houses being built. The open aspect will be lost with this development and will damage the areas natural beauty.</li> <li>Numerous types of wildlife and biodiversity will be negatively affected by this development and an important wildlife corridor will be lost. Need to ensure there is provision for wildlife and biodiversity onsite or elsewhere if development takes place.</li> <li>The loss of green infrastructure should be avoided, mitigated or protected.</li> </ul>
<p><b>Air Quality</b></p> <ul style="list-style-type: none"> <li>The carbon emissions created by the increased traffic will significantly increase air pollution in the area. This will be detrimental to people’s health.</li> </ul>
<p><b>Flood Risk</b></p> <ul style="list-style-type: none"> <li>The water table is very high which may have led to the site becoming contaminated from a neighbouring heavily contaminated site.</li> <li>Flooding is a significant issue for this area. Areas of Littleborough regularly flood and this development will only make this worse.</li> <li>Need to protect the water levels at Hollingworth Lake.</li> <li>Sustainable drainage systems need to be considered.</li> </ul>
<p><b>Heritage</b></p> <ul style="list-style-type: none"> <li>This development will ruin the identity of a historic lakeside village.</li> </ul>
<p><b>Site Specific Issues</b></p> <ul style="list-style-type: none"> <li>The allocation needs to safeguard Brown Lodge Drive and the other adjoining cul-de-sacs.</li> <li>Objections to the loss of the car park used for Hollingworth Lake and requests to remove this car park from the site boundary.</li> <li>Paths for horse riding in Littleborough and Smithy Bridge have diminished. Please include multi user paths in any development.</li> <li>An adjacent site has open mine shafts and pits which need to be considered.</li> </ul>
<p><b>Response to Comments</b></p> <p>The site selection paper identifies that Land north of Smithy Bridge meets criteria 1 and 7.</p> <p>The justification for the housing figures are set out Policy GM-H 1 and the supporting background evidence including the GM Strategic Housing Market Assessment 2020. The Local Plan policy deals with the provision of affordable housing. The site also offers the opportunity to provide larger, higher value properties which are in short supply in the borough</p> <p>The case for exceptional circumstances is set out for the Green Belt proposals as a whole and the specific case for this allocation in the accompanying Green Belt Topic Paper.</p> <p>The GMSF prioritises the use of brownfield land. However it acknowledges that in order to meet the housing and employment needs selective release of Green Belt is necessary.</p> <p>Transport analysis contained in the locality assessment has identified necessary mitigation to accommodate any additional traffic generated by the proposed allocation. The site is</p>

well served by both Smithy Bridge and Littleborough railway stations and the policy requires good links to both these stations.

Objective 9 of the GMSF seeks to ensure that new development is properly served by social and physical infrastructure including schools, health, social care, sports and recreation facilities. The policy seeks contributions to ensure sufficient school places and facilitate the delivery of a new primary school on the site to meet projected needs in the area.

Policy GM-G 9 covers the concept of net gain with respects to Green Infrastructure and biodiversity. Given the proximity of the allocation to designated national and European sites a project specific Habitats Regulations Assessment will be required for planning applications involving 50 or more residential units.

The Integrated Appraisal (IA) identifies that the allocation is within 500m of an existing AQMA. The policy for the allocation incorporates wording that aligns with the mitigation suggested in the IA.

The site has been covered by the GM Strategic Flood Risk Assessment (SFRA) which has considered all the allocations in respect of flood risk and water management and no significant issues have been identified.

Heritage and archaeological screening has been undertaken by the University of Salford Archaeology Team.

The policy requires the delivery of a replacement visitor car park to replace the existing poor quality car park currently at the southern end of the site.

Other concerns raised by consultees are covered by the allocations policy, other GMSF policies or Local Plan policies.

**GM Allocation 27: Newhey Quarry (451 comments)**

Some support is given to the redevelopment of the site as it is felt that the land can be used more effectively, rather than remaining unused and at risk of deterioration. However there are concerns that the size and type of housing proposed will be unaffordable and does not fit the local housing need for this area. Residents felt that the types of houses that are needed include smaller housing, affordable housing, properties suitable for first time buyers and houses suitable for an increasingly growing elderly population.

There was strong objection to any potential loss of Green Belt land. Some responses suggested that the best solution and way forward would be to concentrate affordable housing within the urban centre and by remediating and developing brownfield sites.

A number of concerns have been raised in regards to the local transport links and roads. There is considerable objection to the additional amount of traffic that would be created from a development of this size. Many respondents felt that the current transport links and roads in the vicinity could not accommodate the increased traffic as the highways are already heavily congested and under strain, especially during peak times and if there is an issue on the M62 motorway. Any additional housing would only exacerbate this issue.

There was a general feeling that many of the local facilities were already overburdened and that a development of this size would mean additional pressure on over stretched resources. Local schools, doctors, dentists and hospitals are over-subscribed with very long waiting times for appointments and local leisure activities would be affected by the development. There was some suggestion the site could be used instead as a local community facility rather than solely for housing.

The Quarry provides a unique home for habitat and biodiversity. Some respondents felt that the wildlife which is specific to the Quarry environment is at serious risk if development takes place, as there would not be an alternative site to accommodate this type of biodiversity. Concerns were raised that there is nothing in the policy that sought to protect this unique habitat and wildlife. Some analysis and assessment needs to be done to identify the quality of the sites biodiversity and geological value before any development takes place.

<b>Principle / scale of development</b>
<ul style="list-style-type: none"> <li>• Development should be focussed on urban areas. There is plenty of housing available in the Rochdale area without needing to release any Green Belt.</li> <li>• The scale of development is too large. There is no need/demand for such a large quantity of homes in this area.</li> <li>• Some support received stating there is scope for development; however, the overall number proposed is too high.</li> <li>• Some support received for the Quarry to be reused/developed therefore bringing it back into use and not being left empty/overgrown.</li> </ul>
<b>Housing (inc affordable housing)</b>
<ul style="list-style-type: none"> <li>• The proposed site does not include the type of housing these area needs, such as affordable and older persons housing.</li> <li>• The housing proposed should be more inclusive and affordable to accommodate local housing need, such as for first time buyers, rather than executive housing. Young people cannot afford to live here and older populations are not being considered for over the plan period.</li> <li>• General disagreement with the methodology used for the Local Housing Need calculations and therefore Rochdale’s housing figure in the GMSF.</li> </ul>

<b>Employment and Economy</b>
<ul style="list-style-type: none"> <li>• The GMSF plan and this proposal has no regard for the farming industry and their livelihood.</li> <li>• The GMSF plan and this proposal do not bring any jobs to this area, just housing.</li> </ul>
<b>Green Belt</b>
<ul style="list-style-type: none"> <li>• There is strong objection to the loss of this Green Belt land. The proposed development and Green Belt release is contrary to the National Planning Policy Framework. No exceptional circumstances can be demonstrated.</li> <li>• The loss of Green Belt will detrimental to the health and wellbeing of residents.</li> <li>• The local character of this area will be lost if the Green Belt is released and developed.</li> </ul>
<b>Brownfield</b>
<ul style="list-style-type: none"> <li>• All brownfield sites should be prioritised, developed first and should take precedence over Green Belt and greenfield sites.</li> <li>• More focus is needed on developing brownfield sites and remediation. There are plenty of brownfield sites available in the area that are not fully being utilised.</li> <li>• There was disagreement with the brownfield sites that have been discounted from development.</li> <li>• There are vacant mills in Rochdale that can be redeveloped and brought back into use first.</li> </ul>
<b>Transport – Highways / Public Transport / Cycling / Walking</b>
<ul style="list-style-type: none"> <li>• Significant objection to the site is due to existing heavy congestion issues in the area, especially on Huddersfield Road A460, A663, Elizabethan Way and at Junction 21. Traffic and congestion is a major problem especially if there is an issue on the motorway.</li> <li>• The existing infrastructure will not be able accommodate increased traffic created from this new housing.</li> <li>• A bypass is needed rather than a relief road.</li> <li>• The current public transport links are inadequate and overstretched.</li> <li>• Space for a cycling route is limited.</li> </ul>
<b>Physical Infrastructure and utilities</b>
<ul style="list-style-type: none"> <li>• The water systems and utilities in this area are in need of renovation.</li> <li>• The existing sewer system is inadequate and in need of renovation.</li> </ul>
<b>Social Infrastructure</b>
<ul style="list-style-type: none"> <li>• More local facilities are needed, as the existing facilities are over-subscribed, including hospitals, doctors, dentists and educational facilities. It is already very difficult to get appointments and school places.</li> <li>• There have been previous housing developments in this area and no extra local facilities were provided to accommodate the additional number of residents.</li> <li>• The Quarry could be redeveloped as a local community facility instead of housing.</li> <li>• Leisure activities in this area will be affected such as birdwatching and walking.</li> <li>• There has already been an increase in anti-social behaviour in this area.</li> </ul>
<b>Environmental – Green Infrastructure, Biodiversity, open space</b>
<ul style="list-style-type: none"> <li>• Newhey Quarry is an important site for a variety of wildlife. Their habitats will be at risk if it is developed.</li> <li>• The uniqueness of the quarry would mean the biodiversity benefits would not be able to be compensated elsewhere. Deer's also visit in the winter from the Moors.</li> <li>• Some of the species at the Quarry may be endangered and therefore protected.</li> <li>• The GMSF policies do not seek to ensure that the local biodiversity will be preserved. Some analysis and assessment is needed for the quality of the sites biological and geological value.</li> </ul>

<ul style="list-style-type: none"> <li>• Attractive green and functional spaces should be a key priority at the Quarry and retained.</li> </ul>
<p><b>Air Quality</b></p> <ul style="list-style-type: none"> <li>• The increase in traffic because of any development is likely to increase air pollution, which is already high. This will be detrimental to people’s health.</li> <li>• The development will also increase the risk of dust in the air.</li> <li>• Any new development should measure the impact on air quality.</li> </ul>
<p><b>Flood risk</b></p> <ul style="list-style-type: none"> <li>• There is no mention of Green Infrastructure, Sustainable Drainage Systems or flood risk mitigation for the proposal.</li> <li>• The development, and the removal of the trees, is likely to increase flood risk in the area.</li> </ul>
<p><b>Heritage</b></p> <ul style="list-style-type: none"> <li>• Newhey Quarry is an important natural heritage site, which has been present for hundreds of years. To develop it would be removing a site of local significance.</li> </ul>
<p><b>Other</b></p> <ul style="list-style-type: none"> <li>• The revised version of the GMSF is not acceptable.</li> <li>• There are too many economic uncertainties to forecast housing this far in the future.</li> <li>• The area has poor signal, which cannot cope with an increase of residents and higher usage.</li> </ul>
<p><b>Response to Comments</b></p> <p>The site selection paper identifies that Newhey Quarry meets criterion 1.</p> <p>The justification for the housing figures are set out Policy GM-H 1 and the supporting background evidence including the GM Strategic Housing Market Assessment 2020. The Local Plan policy deals with the provision of affordable housing. The site offers a mix of housing types, including the opportunity to provide larger, higher value properties which are in short supply in the borough.</p> <p>The case for exceptional circumstances is set out for the Green Belt proposals as a whole and the specific case for this allocation in the accompanying Green Belt Topic Paper.</p> <p>Newhey Quarry is a brownfield site and the GMSF prioritises the use of brownfield land. However it acknowledges that in order to meet the housing and employment needs, selective release of Green Belt is necessary.</p> <p>Transport analysis contained in the locality assessment has identified necessary mitigation to accommodate any additional traffic generated by the proposed allocation. The policy refers to the provision of publically available car parking to serve the Metrolink stop in Newhey and the residents on Huddersfield Road to alleviate on street parking issues.</p> <p>Objective 9 of the GMSF seeks to ensure that new development is properly served by social and physical infrastructure including schools, health, social care, sports and recreation facilities.</p> <p>Policy GM-G 9 covers the concept of net gain with respects to Green Infrastructure and biodiversity. The policy includes criteria to ensure that any treatment of the quarry face takes the opportunity to incorporate biodiversity and attractive visual features to enhance the quality of the development.</p>



The Integrated Appraisal (IA) identifies that the allocation is within 500m of an existing AQMA. The policy for the allocation incorporates wording that aligns with the mitigation suggested in the IA.

The site has been covered by the GM Strategic Flood Risk Assessment which has considered all the allocations in respect of flood risk and water management and no significant issues have been identified.

The policy includes the need to ensure the design of the scheme preserves and enhances the setting of the listed St Thomas Church. Heritage and archaeological screening has been undertaken by the University of Salford Archaeology Team.

Other concerns raised by consultees are covered by the allocations policy, other GMSF policies or Local Plan policies.

### **GM Allocation 28: Roch Valley (453 comments)**

Many respondents felt the scale of development was too large for this area and the site could not be justified for use as housing. Further to this, there was disagreement with the type of housing proposed, as this does not meet local housing needs for this area. There is no affordable or older persons housing proposed and too much focus on high quality, expensive homes which local people cannot afford.

Another key concerns is the impact on the local traffic, in particular on the A58 and Smithy Bridge Road. These roads are already heavily congested, especially at peak times, and any additional traffic will make this much worse and unbearable. The level crossing is frequently down which disrupts traffic and if local trains were increased on this route then this will mean even greater delays on these roads. There is a lot of concern that the local road infrastructure will not be able to support the additional traffic resulting from this development.

Many respondents felt that public transport links are overcrowded and inadequate. Public transport facilities are a concern at Smithy Bridge station and Milnrow Metrolink stop where services are very overcrowded during rush hour. These services will not be able to cope with increased demand resulting from the proposed houses.

There are numerous comments regarding flood risk issues in the area. Existing flooding has been highlighted as a particular concern and any new development will only increase flood risk. The site is too close to the River Roch which is prone to flooding and previous flood prevention measures in this area didn't work.

Concerns were raised regarding the detrimental impact development will have on the wildlife and how it will decrease the levels of biodiversity. The site is an attractive river valley, the proposed development will detrimentally change the landscape at Smithy Bridge forever and destroy the natural beauty of the area.

Some respondents questioned why the land is protected but still being considered for development. It is felt that open green spaces are an important part of the area and are used for walking, cycling and other recreation activities that benefit people's health and wellbeing.

<b>Principle / scale of development</b>
<ul style="list-style-type: none"> <li>• This land should be protected and not used for a residential development.</li> <li>• The proposed capacity is currently too high. It will be reduced at the next stage as tactic to appease objectors.</li> <li>• The scale of development is too large for a small area.</li> </ul>
<b>Housing (inc affordable housing)</b>
<ul style="list-style-type: none"> <li>• There is too much focus on high quality, expensive homes which is not suitable for the area as local people cannot afford them.</li> <li>• The type of housing proposed does not met the local need. There is no affordable or older persons housing proposed.</li> <li>• The proposed housing is not suitable for the jobs market.</li> <li>• No more houses are needed in this area.</li> </ul>
<b>Employment and Economy</b>
<ul style="list-style-type: none"> <li>• The proposed development may harm the rural economy.</li> </ul>
<b>Green Belt</b>
<ul style="list-style-type: none"> <li>• This is Protected Open Land. Why has this been designated as protected if it can still be built on?</li> </ul>

<b>Brownfield</b>
<ul style="list-style-type: none"> <li>• Brownfield sites should be remediated and built out first as a priority.</li> <li>• Need to focus development in town centres and on brownfield sites.</li> </ul>
<b>Transport – Highways / Public Transport / Cycling / Walking</b>
<ul style="list-style-type: none"> <li>• The local road infrastructure will not be able to support the additional traffic resulting from this development.</li> <li>• Smithy Bridge Road, the A58 and many local roads are already heavily congested, especially during peak hours. Any additional traffic will make this much worse and unbearable.</li> <li>• The level crossing is frequently down which disrupts traffic. Any additional train's services will cause even more delays.</li> <li>• The local road infrastructure already needs improvement, without the added pressure of further housing.</li> <li>• The train service is overcrowded and inadequate. The Metrolink service is also overcrowded for those who can access it.</li> </ul>
<b>Physical Infrastructure and utilities</b>
<ul style="list-style-type: none"> <li>• The existing drainage systems will not be able to support the additional run off from the development.</li> </ul>
<b>Social Infrastructure</b>
<ul style="list-style-type: none"> <li>• All existing social infrastructure is already overstretched.</li> <li>• Doctors, dentists and schools are all oversubscribed, with long wait times for appointments.</li> <li>• Better local facilities are needed in this area.</li> <li>• There needs to be more investment in the local tourism.</li> </ul>
<b>Environmental – Green Infrastructure, Biodiversity, open space</b>
<ul style="list-style-type: none"> <li>• This site is an attractive river valley. Some development may be justified in the north, but not the south.</li> <li>• The proposed development will detrimentally change the landscape at Smithy Bridge forever.</li> <li>• The development will destroy the natural beauty of the area.</li> <li>• Green spaces are an important part of the area and are used for walking, cycling and other recreation activities that benefit people's health and wellbeing.</li> <li>• The development will have a detrimental impact on the wildlife and will decrease the levels of biodiversity.</li> <li>• The loss of green space will have a negative impact on climate change.</li> </ul>
<b>Air Quality</b>
<ul style="list-style-type: none"> <li>• The air quality will be negatively affected by the increase in traffic.</li> </ul>
<b>Flood risk</b>
<ul style="list-style-type: none"> <li>• The site and surrounding area are on a flood plain. Any development will result in increased flooding in the area.</li> <li>• The site is too close to the River Roch which is prone to flooding. Previous flood prevention measures in this area didn't work.</li> <li>• Our green spaces provide natural flood measures.</li> </ul>
<b>Other</b>
<ul style="list-style-type: none"> <li>• No information is provided as to how excellent design and sustainability will be achieved.</li> </ul>
<b>Response to Comments</b>
The site is designated as Protected Open Land and is not Green Belt.

The justification for the housing figures are set out Policy GM-H 1 and the supporting background evidence including the GM Strategic Housing Market Assessment 2020. The Local Plan policy deals with the provision of affordable housing. The site also does offer the opportunity to provide larger, higher value properties which are in short supply in the borough.

The GMSF prioritises the use of brownfield land. However it acknowledges that in order to meet the housing and employment needs, selective release of greenfield land is necessary.

Transport analysis contained in the locality assessment has identified necessary mitigation to accommodate any additional traffic generated by the proposed allocation. The site is well served by both Smithy Bridge railway station and bus services along the A58. The policy also includes reference to the delivery of a section of a proposed residential relief road between Smithy Bridge Road and Albert Royds Street to improve traffic flows in the area. This would also include high quality pedestrian and cycle routes.

Objective 9 of the GMSF seeks to ensure that new development is properly served by social and physical infrastructure including schools, health, social care, sports and recreation facilities. The policy seeks contributions to ensure sufficient school places are provided to meet the needs of the development.

Policy GM-G 9 covers the concept of net gain with respects to Green Infrastructure and biodiversity.

The Integrated Appraisal (IA) identifies the allocation will need to respond to climate change impacts which can be achieved through careful design as a result of subsequent masterplanning. The policy also includes reference to electric vehicle charging points and cycle storage.

The Integrated Appraisal (IA) identifies that the allocation is within 500m of an existing AQMA. The policy for the allocation incorporates wording that aligns with the mitigation suggested in the IA.

The site has been covered by the GM Strategic Flood Risk Assessment (SFRA) which has considered all the allocations in respect of flood risk and water management and no significant issues have been identified. The policy makes reference to the safeguarding of land between the developed part of the site and the River Roch to contribute to measures that deliver flood alleviation benefits for the River Roch catchment between Littleborough and Rochdale Town Centre.

Other concerns raised by consultees are covered by the allocations policy, other GMSF policies or Local Plan policies.

**GM Allocation 29: Trows Farm (283 comments)**

There is objection to the proposal of building on a significant proportion of the Green Belt which would increase the urban sprawl between Oldham and Rochdale. Further additional new housing in the area is not supported unless it's for social or affordable housing.

There are key concerns about how the new additional homes proposed would place a considerable amount of pressure on existing, and in some instances inadequate infrastructure, which could exacerbate issues around drainage, sewers and flooding measures.

There is support for providing adequate infrastructure such as schools, hospitals and doctors before any development takes place, in order to ensure that community facilities can accommodate and manage the additional capacity/subscription. This could be either through an expansion of the existing site or provision of new facilities.

Further additional development within the area will exacerbate existing congestion issues. It is assumed the development will result in an increase of 1400 cars on these local roads making the congestion much worse. Furthermore, there is concern that none of the future mitigating transport interventions set out within the Strategy and Delivery Plan have been properly scoped, subject to feasibility, or are funded (e.g. tram-train usage from Rochdale railway station to Bury via Castleton and Heywood and the provision of a new railway station at Slattocks).

Parts of the site are not deemed to be sustainable and will not benefit from good access to a bus or railway service.

The proposed site is built on a sand belt and does not make it suitable for development.

The development will have a negative impact on climate change by loss of Green Belt land which includes significant local biodiversity and heritage assets. It also captures carbon, provides space for water to prevent flooding, and protects the water supply. The concern is that the increasing effects of urbanisation from building more houses will only result in further decline of species such as foxes, rabbits and hedgehogs and similar organism's, ecology, biodiversity and existing wildlife on the site, such as wild deer, bats, foxes, nesting birds and other vulnerable species.

Tandle Hill and the land that surrounds it is seen as an important historical asset and residents seek to protect and preserve this for future generations.

<b>Principle / scale of development</b>
<ul style="list-style-type: none"> <li>Development will negatively impact open land, however it is in a sustainable location near the motorway.</li> </ul>
<b>Housing (inc affordable housing)</b>
<ul style="list-style-type: none"> <li>Any proposed housing should be built on brownfield sites and at much higher density.</li> <li>There is a need for affordable housing in this area.</li> </ul>
<b>Employment and Economy</b>
<ul style="list-style-type: none"> <li>The GMSF is incompatible with low paid jobs.</li> <li>Working farms need protecting not developing.</li> </ul>
<b>Green Belt</b>
<ul style="list-style-type: none"> <li>The proposal will result in urban areas merging together.</li> <li>Exceptional circumstances have not been demonstrated to release this land from Green Belt.</li> </ul>

<b>Brownfield</b>
<ul style="list-style-type: none"> <li>• Brownfield sites are being underutilised by the GM Spatial Plan.</li> <li>• Brownfield sites should be developed out before any Green Belt land is released.</li> <li>• Remediation of difficult/toxic brownfield sites across Greater Manchester, no matter how large or small, should be undertaken before considering Green Belt or green space for development.</li> </ul>
<b>Transport – Highways / Public Transport / Cycling / Walking</b>
<ul style="list-style-type: none"> <li>• The existing road infrastructure in this area is not designed for the additional capacity new homes and employment space will bring.</li> <li>• Concerns raised over the negative impact on roads and motorways in terms of congestion, noise and air pollution.</li> <li>• None of the future mitigating transport interventions set out within the Strategy and Delivery Plan have been properly scoped, subject to feasibility, or are funded (e.g. tram-train usage from Rochdale railway station to Bury via Castleton and Heywood and the provision of a new railway station at Slattocks).</li> </ul>
<b>Physical Infrastructure and utilities</b>
<ul style="list-style-type: none"> <li>• Development will result in a significant impact on existing and future services.</li> </ul>
<b>Social Infrastructure</b>
<ul style="list-style-type: none"> <li>• Concerns raised over the impact congestion, noise and air pollution will have on existing school playgrounds, gardens and green spaces for leisure / play.</li> <li>• A development of this size needs local shops and facilities for older children.</li> <li>• Existing infrastructure such as hospitals, doctors, dentists, and educational facilities, are already over capacity/subscribed.</li> <li>• Investment in schools, facilities and services need to be made before the proposed developments and built out.</li> </ul>
<b>Environmental – Green Infrastructure, Biodiversity, open space</b>
<ul style="list-style-type: none"> <li>• The Green Belt land is good for Climate Change including significant local biodiversity and heritage assets. It also captures carbon, provides space for water to prevent flooding, and protects the water supply.</li> <li>• The loss of huge amounts of the Green Belt will have a detrimental impact on local residents who use this as outdoor amenity green space in regards to walking, hiking, horse riding, running and cycling.</li> </ul>
<b>Air Quality</b>
<ul style="list-style-type: none"> <li>• The roads are already congested; junction 21 has the highest recorded levels of nitrogen dioxide a further potential 1400 cars will only add to this.</li> </ul>
<b>Flood risk</b>
<ul style="list-style-type: none"> <li>• This site is on a flood plain, any development will increase the risk of flooding.</li> <li>• Development will cause issues with the sewers, which can't cope with the increased demand.</li> </ul>
<b>Heritage</b>
<ul style="list-style-type: none"> <li>• There is a Jewish burial site at Trows Farm.</li> </ul>
<b>Other</b>
<ul style="list-style-type: none"> <li>• To develop farm land at a time where food production will be critical following the EU exit is not sensible and it should be retained for better use.</li> <li>• Raising the awareness of the consultation has been poor and failure to comply with the Statement of Community Involvement.</li> </ul>
<b>Response to Comments</b>
<p>The site is designated as Protected Open Land and is not Green Belt.</p>

The Local Plan policy deals with the provision of affordable housing. The policy seeks to deliver high quality family housing.

The GMSF prioritises the use of brownfield land. However it acknowledges that in order to meet the housing and employment needs, selective release of greenfield land is necessary.

Transport analysis contained in the locality assessment has identified necessary mitigation to accommodate any additional traffic generated by the proposed allocation. The site is well served by Castleton railway station and a high frequency bus service through Castleton Centre. The policy requires attractive walking and cycling routes to these.

Objective 9 of the GMSF seeks to ensure that new development is properly served by social and physical infrastructure including schools, health, social care, sports and recreation facilities. The development will be expected to contribute to the provision of a new school to serve this development and the wider area.

Policy GM-G 9 covers the concept of net gain with respects to Green Infrastructure and biodiversity. Given the proximity of the allocation to designated national and European sites a project specific Habitats Regulations Assessment will be required for planning applications involving 50 or more residential units.

The Integrated Appraisal (IA) identifies that the allocation is within 150m of an existing AQMA. The policy include the need to incorporate appropriate noise and air quality mitigation along the motorway corridors.

The Integrated Appraisal (IA) identifies the allocation will need to respond to climate change impacts which can be achieved through careful design as a result of subsequent masterplanning. The policy also includes reference to electric vehicle charging points and cycle storage.

The site has been covered by the GM Strategic Flood Risk Assessment (SFRA) which has considered all the allocations in respect of flood risk and water management and no significant issues have been identified.

Heritage and archaeological screening has been undertaken by the University of Salford Archaeology Team.

Public consultation has been carried out in line with the Rochdale Statement of Community Involvement and national regulations relating to the production of development plans.

Other concerns raised by consultees are covered by the allocations policy, other GMSF policies or Local Plan policies.

**Further comments on the overall proposals for Rochdale, including strategic transport interventions (445 comments)**

<b>Principle / scale of development</b>
<ul style="list-style-type: none"> <li>• Green Belt land should be protected with the priority being building on Brownfield Land first.</li> <li>• Amount of development proposed is not required given latest population projections</li> </ul>
<b>Housing (inc affordable housing)</b>
<ul style="list-style-type: none"> <li>• The housing being put forward by developers are 3/4 &amp; 5 bed-roomed houses - these aren't affordable/social homes</li> <li>• All aspirational family housing is being built on green spaces outside towns</li> <li>• More housing could be built in town centres</li> <li>• Additional housing is needed to support the proposed employment growth in the borough</li> <li>• Need to use empty properties and build taller/higher densities</li> </ul>
<b>Employment and Economy</b>
<ul style="list-style-type: none"> <li>• Plenty of vacant industrial units that should be occupied first</li> <li>• Empty and redundant area of employment should be invested in and reused.</li> <li>• Old mills and factories should be reused and built out.</li> </ul>
<b>Green Belt</b>
<ul style="list-style-type: none"> <li>• A number of sites put forward as alternatives to the allocations in the draft plan, some of which are still in the Green Belt.</li> <li>• Exceptional circumstances for Green belt loss have not been demonstrated</li> <li>• Land proposed to go into the Green Belt is just to make the figures look better</li> <li>• Too much Green Belt lost in Rochdale and Oldham</li> </ul>
<b>Brownfield</b>
<ul style="list-style-type: none"> <li>• Plenty of brownfield sites that could accommodate new development including former mill sites and sites in the town centre</li> </ul>
<b>Transport – Highways / Public Transport / Cycling / Walking</b>
<ul style="list-style-type: none"> <li>• Road infrastructure, particularly the local highway network is not up to dealing with the increase in traffic</li> <li>• A detailed traffic impact assessment should be carried out, providing viable and costed solutions to the current and future traffic congestion before any decisions are made</li> <li>• Improve national network rail connections with the local connections</li> <li>• Train carriages are not fit for purpose anymore</li> <li>• Train and bus services are unreliable with poor weekend, evening service</li> <li>• Park and Ride facilities need to be increased in capacity to accommodate additional development and encourage people to use public transport.</li> <li>• Until realistic proposals for public transport are made to improve frequency, cost and reduce length of overall journey the car will remain a better option</li> <li>• Greater focus required on walking and cycling</li> </ul>
<b>Social Infrastructure</b>
<ul style="list-style-type: none"> <li>• Inadequate social infrastructure (school, doctors, dentists, hospitals) is already a significant problem within the area and additional development will exacerbate and place more pressure on this.</li> <li>• Local policing is a real issue and with the closure of local police stations crime is rising.</li> <li>• Facilities for the elderly do not appear to have been considered.</li> </ul>



<b>Environmental – Green Infrastructure, Biodiversity, open space</b>
<ul style="list-style-type: none"> <li>• Loss of important wildlife and habitats</li> <li>• Green Belt provides a valuable area for recreation and improves overall health including walking, views of the countryside, all of which will be taken away by development.</li> <li>• Should be a greater focus on green networks and corridors</li> <li>• Loss of important farmland</li> </ul>
<b>Air Quality</b>
<ul style="list-style-type: none"> <li>• Trees provide a source of oxygen and building on the Green Belt will increase air pollution.</li> <li>• Congestion will lead to a reduction in air quality</li> </ul>
<b>Flood risk</b>
<ul style="list-style-type: none"> <li>• Building on these green areas will increase flooding as they currently absorb a large amount of water</li> <li>• Several of the proposed allocations are affected by flooding</li> </ul>
<b>Heritage</b>
<ul style="list-style-type: none"> <li>• Unclear why Crimble Mill is being seriously considered given the various issues attached to it without any proper level of testing.</li> <li>• Identity of smaller villages and settlements will be lost through the new development</li> </ul>
<b>Other</b>
<ul style="list-style-type: none"> <li>• Acknowledge that new development is required but disappointed in the way it has been approached and communicated</li> <li>• Statement of Community Involvement has not been followed</li> <li>• Views appear to have had no effect and the Council considers building on Green Belt an easier option</li> <li>• The Council is not interested in people's views as they have already made their decisions.</li> <li>• Mass migration is causing the additional need for development including new homes and leaving the EU this will eliminate this need.</li> <li>• Missed opportunity to rejuvenate Rochdale Town Centre in order to make a vibrant living space.</li> <li>• Cross boundary sites should have been included within the Rochdale sites and is misrepresentative.</li> <li>• Plan is flawed and the requirements are unlikely to be met because of insufficient evidence.</li> <li>• Does not align with the objectives of the GM Vision</li> <li>• The three main principals of the plan seeks development on brownfield sites, affordable or social housing, focused in towns and cities, not rural areas in order to protect our green belt - the proposals in this plan do not adhere to these.</li> <li>• Consider smaller developments in areas which would less of an impact on surrounding areas.</li> </ul>
<b>Response to Comments</b>
<p>The justification for the housing figures are set out Policy GM-H 1 and the supporting background evidence including the GM Strategic Housing Market Assessment 2020. Rochdale's Local Plan policy deals with the provision of affordable housing.</p> <p>A large proportion of the homes to come forward in the plan period are identified in the existing baseline supply. The baseline supply for Rochdale includes a number of sites and buildings in existing town centres.</p>

The existing employment supply includes a number of vacant and underused sites and identifies them to come forward over the plan period. However in order to boost northern competitiveness it is considered that a range of high quality opportunities is required to support economic growth.

The case for exceptional circumstances is set out for the Green Belt proposals as a whole and the specific case for each allocation in the accompanying Green Belt Topic Paper. The amount of Green Belt lost has been minimised as far as possible taking account of development needs. The amount of Green Belt lost has been reduced significantly from the 2016 draft GMSF.

The GMSF prioritises the use of brownfield land. However it acknowledges that in order to meet the housing and employment needs selective release of Green Belt is necessary.

Transport analysis contained in the locality assessment has identified necessary mitigation to accommodate any additional traffic generated by the proposed allocations.

Both the thematic and allocation policies within the GMSF place an emphasis on increasing walking and cycling through the creation of attractive, safe and convenient routes.

Objective 9 of the GMSF seeks to ensure that new development is properly served by social and physical infrastructure including schools, health, social care, sports and recreation facilities.

Policy GM-G 9 covers the concept of net gain with respects to Green Infrastructure and biodiversity. The allocation policies require the incorporation of high quality green and blue infrastructure within the proposed development. This will provide publically accessible open space close to people's homes with the potential to improve health and wellbeing.

The Integrated Appraisal (IA) assess all the proposed allocations against an objective for air quality. The policy for each allocation incorporates wording that aligns with the mitigation suggested for air quality in the IA.

All proposed allocations have been covered by the GM Strategic Flood Risk Assessment (SFRA) which has considered all the allocations in respect of flood risk and water management.

Heritage and archaeological screening has been undertaken where required by the University of Salford Archaeology Team and where appropriate has been reflected in the allocation policies.

Public consultation has been carried out in line with the Rochdale Statement of Community Involvement and national regulations relating to the production of development plans.

Other concerns raised by consultees are covered by the allocations policy, other GMSF policies or Local Plan policies.

### 3.2.7. Strategic Allocations in Salford

There are 4 allocations in Salford. There were 2,100 comments received in relation to the Salford allocations.

#### **GM Allocation 30: Hazelhurst Farm (203 comments)**

The landowner supports the allocation with amendments sought to the approach to affordable housing, the site boundary, school provision, quantum of development, and the removal of requirements relating to master planning and allotments.

A large number of objections to the allocation were received with the most significant numbers relating to the exacerbation of existing issues of congestion, particularly in peak times, on a number of local roads (with the impact on Leigh Road and Worsley Road most commonly mentioned). The cumulative impact of development with other housing developments and RHS Bridgewater was raised, alongside the lack of community infrastructure (particularly schools and doctors / medical facilities).

The issue of air pollution given the proximity of the site to the East Lancashire Road and motorway was a concern for many. Related to this, it was identified that buses (including the Vantage service) are full and overcrowded when reaching the local area and so do not provide a realistic alternative to driving.

A large number of representations objected to the loss of Green Belt / green infrastructure. A number of other negative impacts on the area were identified, including the area already being overcrowded from recent developments, the disruption during the building of the dwellings, a potential drop in property values, and increased crime.

<p><b>Principle / scale of development</b></p> <ul style="list-style-type: none"> <li>• Question the need for the scale of new housing development with reference to issues including validity of government targets in light of Brexit, immigration control, and the use of out of date data (i.e. using 2014 based household projections instead of the 2016 ones).</li> <li>• Concern over the cumulative impact of development, when consideration is given to other developments in the local area that have been completed recently or are under construction.</li> <li>• Strong support for the allocation given that the proposed development would help the city meet its housing needs; there are no technical or environmental constraints to developing the site.</li> <li>• The site has the potential for 450 dwellings not 400, once land to the north of the site (as set out in the Draft GMSF) is included within the site boundary.</li> <li>• Policy requirement to masterplan the site is onerous and unnecessary.</li> </ul>
<p><b>Housing (inc affordable housing)</b></p> <ul style="list-style-type: none"> <li>• Issues raised around the provision of affordable housing, including its location, whether the homes will in practice be affordable, the deliverability of 50% being affordable, and how in keeping affordable housing would be for the local area.</li> <li>• 50% affordable housing requirement is supported.</li> <li>• Development would provide family houses in an area where there is a need.</li> </ul>
<p><b>Green Belt</b></p> <ul style="list-style-type: none"> <li>• Object to the loss of Green Belt. Issues identified included a lack of exceptional circumstances, loss of role as a 'green lung' and the setting of a precedent.</li> <li>• Any development of the Green belt would contravene promises made by the GM Mayor to protect such land.</li> <li>• The site does not perform a strategic Green Belt function.</li> </ul>

<p><b>Brownfield</b></p> <ul style="list-style-type: none"> <li>• Focus should instead be on available brownfield sites and vacant buildings; the supply of brownfield sites should be fully exhausted before Green Belt is released.</li> <li>• Need to take account of new brownfield sites that will emerge during the plan period</li> <li>• There are more brownfield sites in the city than shown on the brownfield register</li> </ul>
<p><b>Transport – Highways / Public Transport / Cycling / Walking</b></p> <ul style="list-style-type: none"> <li>• Lack of suitable access points into the site, particularly given proximity of the A580 / M60 and the narrow width of Hazelhurst Road.</li> <li>• Inadequate public transport links, including issues of overcrowding (particularly on the Vantage services) and reduced bus services to the area identified.</li> <li>• Local infrastructure is at breaking point; there is need for major investment in public transport and other infrastructure in the Worsley and Boothstown area.</li> <li>• There would be a large number of additional cars as a result of development; this would exacerbate significant existing issues of congestion on nearby local and strategic roads including the cumulative impact of the RHS Garden Bridgewater and other GMSF allocations in the wider area.</li> <li>• Insufficient transport information has been provided about the impact of the GMSF on the strategic route network; given the scale of the allocation it is likely to give rise to individual traffic impacts due to the proximity of the site to junction 14 of the M60.</li> <li>• Developments in Salford in the vicinity of the M60 should be time limited.</li> <li>• There would be traffic disruption during the construction phase, whilst traffic issues are a danger to pedestrians.</li> <li>• The rail network cannot cope with more houses / population; Moorside which is the nearest station around one mile away lacks parking and disabled access.</li> </ul>
<p><b>Physical Infrastructure and utilities</b></p> <ul style="list-style-type: none"> <li>• Pylons run across the site; account will need to be taken of this as part of any development. Preference would be that land beneath the overhead power lines is not built on.</li> <li>• Local sewerage issues.</li> </ul>
<p><b>Social Infrastructure</b></p> <ul style="list-style-type: none"> <li>• Concerns relating to the existing capacity of community infrastructure (including schools, doctors, dentists, emergency services and shops) and the potential to support new homes.</li> <li>• Welcome the provision of setting aside land for a new school.</li> <li>• Lack of detail regarding the provision of a new school on the site, including its funding, faith and any traffic implications.</li> </ul>
<p><b>Environmental – Green Infrastructure, Biodiversity, open space</b></p> <ul style="list-style-type: none"> <li>• Concerns relating to loss of agricultural land.</li> <li>• Negative impact / loss of wildlife and habitats including protected species and woodland.</li> <li>• Concerns regarding loss of green space / recreation opportunities due to development, which compounds the loss of other greenspaces in the area. Greenspaces should be protected from development.</li> <li>• Scepticism as to whether the policy requirements to preserve features such as trees, hedgerows and natural features will actually be implemented.</li> <li>• Reference should be made to increasing multifunctional green infrastructure on site and in particular the creation of new woodland buffers, and a green corridor to connect areas north and south of the site.</li> <li>• Allocation provides opportunities to secure net gains for nature and communities.</li> <li>• A requirement for allotments is unjustified given the family dwellings will have gardens and is therefore not an effective use of the site.</li> </ul>

<ul style="list-style-type: none"> <li>• Welcomed that development will be required to protect and enhance existing key green infrastructure assets.</li> </ul>
<p><b>Air Quality</b></p>
<ul style="list-style-type: none"> <li>• Development will lead to exacerbation of existing issues of poor air quality including through traffic and loss of green infrastructure.</li> </ul>
<p><b>Flood risk</b></p>
<ul style="list-style-type: none"> <li>• There are local drainage issues that will be worsened as a result of development, particularly if natural ponds, pools and soakaways are built on.</li> <li>• Support for incorporation of sustainable urban drainage systems.</li> </ul>
<p><b>Other</b></p>
<ul style="list-style-type: none"> <li>• There were mining works and tunnels under the entire area which has an impact on the potential stability of the land</li> <li>• Criticism of consultation process undertaken</li> <li>• Negative impact on the attractiveness of the area, as result of a number of issues including those set out above, and increased crime levels such as burglaries</li> <li>• Loss of property value</li> <li>• Proximity to the BOC plant on the East Lancs Road which is a hazardous installation</li> </ul>
<p><b>Response to Comments</b></p>
<p><b>Principle / scale of development</b></p> <ul style="list-style-type: none"> <li>• The site selection paper identifies that the Hazelhurst Farm allocation meets criterion 1 (Land which has been previously developed and/or land which is well served by public transport).</li> <li>• The Greater Manchester housing requirement is calculated using the government's standard local housing need methodology set out in national planning practice guidance. This requires the use of the 2014 based-household projections.</li> <li>• There has been redistribution of some of the local housing need that arises in the rest of Greater Manchester to Salford reflecting significant opportunities within the centre of the conurbation (and the market for high density apartments). The Housing Topic Paper explains further how the housing requirements have been calculated.</li> <li>• The government is consulting on changes to the local housing need methodology, that would involve using the most recently published projections. Given this is only a consultation and subject to potential changes, the need for housing in GM uses the current methodology (i.e. it uses 2014-based projections as the starting point).</li> <li>• A transport locality assessment has been prepared for the site which looks at the cumulative impacts of development. In addition, social infrastructure will be required as part of any development where this is necessary (see below for further details).</li> <li>• The site is considered to be capable of accommodating 400 dwellings. A school is also required on the site (if there is no capacity in the local area). Land to the north of the allocation boundary is not appropriate for development due to habitats issues.</li> <li>• Masterplan requirement will allow local community to be involved in how the site will be developed. The Revised Draft GMSF required that any masterplan or SPD should be adopted by the city council This has been amended so that the requirement for a masterplan does not need adopting by the city council, rather it has to be considered acceptable by the city council (see criterion 1).</li> </ul>
<p><b>Housing (including affordable housing)</b></p> <ul style="list-style-type: none"> <li>• A viability assessment has been prepared for the site by Three Dragons which demonstrates that it can support 50% affordable housing. This forms part of the evidence base for the GMSF.</li> </ul>

### **Green Belt**

- The allocation would result in the loss of 17 ha Green Belt, but there will be a net gain in Salford overall of 29ha overall as some additions to the Green Belt are also proposed in Salford in the GMSF.
- The need to deliver the long-term positive outcomes of the Greater Manchester Strategy is considered to amount to exceptional circumstances which justify altering the boundaries of the Green Belt. The case for exceptional circumstances is explained further in the Green Belt topic paper.
- An assessment of Green Belt harm resulting from the release of GMSF allocations has been undertaken. It is identified that the release of this allocation would cause 'low-moderate' harm to Green Belt purposes and 'no/negligible' harm to adjacent Green Belt.
- The GMSF allocation policy (criterion 7) requires that development responds to the site's location, characteristics and surroundings to takes opportunities to incorporate green infrastructure that can most effectively benefit the site and the wider area.

### **Brownfield**

- The GMSF sets out a brownfield preference approach.
- The supply of dwellings on brownfield land and vacant buildings has been maximised as set out in the Housing Topic Paper.
- Account has been taken of brownfield sites that will emerge over the plan period where there is current evidence that this will happen.
- The brownfield register is only a partial snapshot of brownfield sites that will come forward for housing. The complete supply of dwellings on brownfield land is set out in the Housing Topic Paper and the city council's Housing and Economic Land Availability Assessment.

### **Transport – Highways / Public Transport / Cycling / Walking**

Locality Assessments have been undertaken to confirm the transport impacts of the allocations. These will be published alongside the Publication GMSF. The Locality Assessment for this site:

- Explains how vehicular access to the site can be achieved.
- Notes that the potential to expand and improve the rapid transit services is being explored by TfGM as a way of improving accessibility by public transport.
- Concludes that this allocation is deliverable and that the traffic impacts are less the severe (which is the test in the NPPF). Whilst the modelling forecasts that some junctions may experience capacity issues, they are not significantly worse than without the allocation. The modelling work presents a 'worst case' scenario and does not reflect opportunities to secure a mode shift to active travel.
- The allocation policy Identifies mitigation to improve accessibility by sustainable modes which are reflected in criteria 3 and 4 of the GMSF site allocation policy.
- Policy PH1 of the Publication Salford Local Plan: Development Management Policies and Designations (January 2020) includes a requirement for all major development to be implemented in accordance with a construction environmental management plan which shall identify how the development will mitigate/minimise effects.
- The Transport Strategy 2040 Draft Delivery Plan indicates that TfGM will work with the rail industry to deliver a continued programme of rail station accessibility and customer facilities improvement.

### **Physical Infrastructure and utilities**

- This constraint is understood and reflected in criterion 12 of the GMSF site allocation policy, which requires the provision of a buffer for the overhead power lines in accordance with National Grid requirements.

- The pressurised sewer and gravity sewers within the vicinity of the site are noted and will need to be planned around.

### **Social Infrastructure**

- The allocation will be required to make appropriate contributions to address its impacts in accordance with policy PC1 (Planning obligations) Salford Local Plan: Development Management Policies and Designations (January 2020) once it is adopted.
- The allocation will be subject to masterplanning in accordance with the GMSF site allocation policy criterion 1. Through this process, Policy HH2 (Provision of health and social care facilities) of the Publication Salford Local Plan: Development Management Policies and Designations (January 2020) requires that appropriate provision is made for primary health care facilities.
- The requirement for the development to set-aside land for additional primary school provision (unless sufficient additional school places can be provided off-site) is retained in the Publication GMSF. The detail regarding school provision will be determined at the masterplanning and planning application stage.

### **Environmental – Green Infrastructure, Biodiversity, open space**

- The majority landowner has completed an Agricultural Land Classification and Soil Resources appraisal which will be published for information alongside the Publication GMSF.
- The site will incorporate public rights of way which will connect into the wider pedestrian and cycling network. This is a requirement of criterion 4 of the allocation policy.
- The GMSF seeks to protect and enhance Greater Manchester's natural assets including its network of green infrastructure. Policies in the Publication Salford Local Plan: Development Management Policies and Designations (January 2020) also protect the city's important recreation land (R3 Protection of recreation land and facilities) and green infrastructure (GI1 Development and Green Infrastructure).
- It is not considered that the site presents any significant ecological constraints, subject to appropriate mitigation measures being taken. Where considered relevant, specific issues that need to be addressed have been identified in the GMSF site allocation policy, this includes criterion 9. These matters will be considered in more detail at the masterplanning stage. The majority landowner has completed an ecological appraisal which will be published for information alongside the Publication Draft GMSF.
- The development will be required to deliver a 10% net gain in biodiversity value in accordance with the GMSF and policy BG2 (Development and biodiversity) of the Publication Salford Local Plan: Development Management Policies and Designations (January 2020).
- Allotments provide a wide range of benefits to site users and the wider environment. The city council aims to expand the number of plots in the city having regard to rising waiting lists and anticipated growth in demand. The requirement for allotment provision within the site allocation reflects the standards in the Salford Greenspace Strategy Supplementary Planning Document 2019.

### **Air Quality**

- It is not considered that the site presents any significant air quality constraints, subject to appropriate mitigation measures being taken. These matters will be considered in more detail at the masterplanning stage. The majority landowner has completed an ecological appraisal which will be published for information alongside the Publication Draft GMSF.
- Criterion 3 of the GMSF site allocation policy requires that the developments is designed to encourage the use of nearby public transport services.

- Various policies within Greater Manchester's Transport Strategy 2040 are aimed at improving air quality across the Region. Greater Manchester is also releasing a Clean Air Plan for consultation coinciding alongside release of the GMSF.

**Flood risk**

- It is not considered that the site presents any significant flood risk constraints, subject to appropriate mitigation measures being taken. Where considered relevant, specific issues that need to be addressed have been identified in the GMSF site allocation policy, these include criterion 11 which requires that the development incorporates sustainable drainage systems. These matters will be considered in more detail at the masterplanning stage. The majority landowner has completed a flood risk appraisal which will be published for information alongside the Publication Draft GMSF.

**Other**

- The archaeological appraisal details the site's former mining activities. Site investigations would be required at the masterplanning stage in order to assess the extent of land stability issues associated with this.
- There have been two formal periods of consultation on the GMSF prior to the Publication Plan (Draft and Revised Draft stages). Consultation has included documents being available on the GMCA website, social media posts, community committee meetings etc. Consultation has been carried out in accordance with the city council's adopted Statement of Community Involvement.
- The development shall be designed to minimise the fear or and opportunities for crime and provide surveillance in accordance with SLP:DMP policy D6 (Design and Crime).
- Property values are not a planning consideration.
- The hazardous installation zone associated with nearby industrial uses which affects the north eastern part of the site is noted and will need to be considered at the masterplanning stage in determining the layout of the development.



**GM Allocation 31: East of Boothstown** (227 comments)

The landowner supports the allocation with amendments sought to the approach to affordable housing and the removal of requirements relating to master planning and allotments.

A large number of objections to the allocation were received with the most significant numbers relating to the exacerbation of existing issues of congestion along Worsley Road and Leigh Road, leading back from Junction 13 of the M60. Comments identified an extended rush hour and very long delays, with the impact of the RHS Garden yet to be felt. Some comments suggested that plans should await outputs from the North West Quadrant Study. Linked to the above, representations referred to inadequate public transport (specifically a lack of capacity on the, otherwise inaccessible, Vantage service and that other services had been pulled as a result) and existing issues of air pollution.

A number of representations were critical of the level of housing need identified overall, the existing capacity on brownfield sites, and specifically in relation to this site, the type of housing being proposed not serving local communities.

A large number of representations objected to the loss of Green Belt / green infrastructure with a number of related issues including loss of habitats (including protected species) and recreation opportunities (specifically playing fields to rear of Falconwood Close and Poynt Chase). A number of other negative impacts on the area were identified, including the area already being overcrowded from recent developments, a lack of capacity in community and utilities infrastructure, a potential drop in property values, increased crime and a conflict with the RHS Garden.

<p><b>Principle / scale of development</b></p> <ul style="list-style-type: none"> <li>• Question need for new houses with reference to issues including validity of government targets, use of out of date data (i.e. using 2014 based household projections instead of the 2016 ones), immigration control, and saturation of local housing market.</li> <li>• Support the allocation which is one of only a small number of opportunities to deliver exceptional quality high value housing. As such it will help to broaden the range of dwellings in Salford, balancing the high volume of apartments in the regional core</li> <li>• Policy requirement to masterplan the site is onerous and unnecessary.</li> </ul>
<p><b>Housing (inc affordable housing)</b></p> <ul style="list-style-type: none"> <li>• Question role of high value homes in addressing issues of affordability and the benefit for local people.</li> <li>• Affordable housing should be on site and to same standard.</li> <li>• Support for 50% affordable housing requirement.</li> <li>• Object to the approach to affordable housing outlined in Salford’s Local Plan and its inclusion within the allocation policy.</li> </ul>
<p><b>Employment and Economy</b></p> <ul style="list-style-type: none"> <li>• Exceptional quality high value housing will complement the economic strategy by helping to attract and retain skilled workers.</li> </ul>
<p><b>Green Belt</b></p> <ul style="list-style-type: none"> <li>• Object to the loss of Green Belt. Issues identified included a lack of exceptional circumstances, loss of role as a ‘green lung’, setting of a precedent, and development already taking place in the Green Belt at the neighbouring RHS Garden.</li> <li>• Questions were raised about the compensatory value of proposed Green Belt additions.</li> <li>• Site presents a logical extension to the urban area to the Canal as a defensible boundary.</li> </ul>

<b>Brownfield</b>
<ul style="list-style-type: none"> <li>• Focus should instead be on available brownfield sites and vacant buildings</li> <li>• Need to take account of new brownfield sites and opportunities to raise development densities that will emerge during the plan period (including declining town centres)</li> </ul>
<b>Transport – Highways / Public Transport / Cycling / Walking</b>
<ul style="list-style-type: none"> <li>• Inadequate public transport links, issues including overcrowding (particularly on the Vantage Service) and reduced bus services to the area identified</li> <li>• Vantage service not accessible to residents of the area</li> <li>• Exacerbate significant existing issues of congestion on nearby local (in particular Leigh Road) and strategic roads (M60 Junction 13) including the cumulative impact of the Royal Horticultural Society Garden Bridgewater, GMSF allocations in the wider area, and through traffic using Leigh Road to access M60 Junction 13.</li> <li>• Focus should instead be in more accessible locations.</li> <li>• Lack of detail regarding transport infrastructure improvements.</li> <li>• Developments near the M60 should be time limited.</li> <li>• New allocations should await the implementation of the conclusions of the North West Quadrant Study.</li> <li>• Traffic issues are a danger to pedestrians.</li> </ul>
<b>Physical Infrastructure and utilities</b>
<ul style="list-style-type: none"> <li>• Concerns relating to capacity of utilities in the area including sewers, water pressure, and gas. Poor internet provision also highlighted.</li> </ul>
<b>Social Infrastructure</b>
<ul style="list-style-type: none"> <li>• Concerns relating to the existing capacity of community infrastructure (including schools, doctors, dentists, emergency services and shops) and the potential to support new homes.</li> <li>• Lack of detail regarding social infrastructure improvements.</li> </ul>
<b>Environmental – Green Infrastructure, Biodiversity, open space</b>
<ul style="list-style-type: none"> <li>• Concerns relating to loss of agricultural land.</li> <li>• Concerns regarding loss of green space / recreation opportunities.</li> <li>• Negative impact/ loss of wildlife and habitats including protected species.</li> <li>• Pursuit of development should not out-weigh significant ecological concerns.</li> <li>• Policy should ensure safeguarding of nearby sites of biological importance.</li> <li>• Allocation provides opportunities to secure net gains for nature and communities.</li> <li>• Add reference to increasing multifunctional GI on site and in particular the creation of new woodland buffers to provide wildlife corridors.</li> <li>• Policy requirement for allotments is unjustified and an ineffective use of the site given that the dwellings will have gardens.</li> </ul>
<b>Air Quality</b>
<ul style="list-style-type: none"> <li>• Development will lead to exacerbation of existing issues of poor air quality including through traffic and loss of green infrastructure</li> </ul>
<b>Flood risk</b>
<ul style="list-style-type: none"> <li>• Development will impact on water table and increase flood risk.</li> <li>• Welcome requirement to protect and enhance green infrastructure and Suds but support should also be given to increasing multifunctional green infrastructure on site.</li> </ul>
<b>Heritage</b>
<ul style="list-style-type: none"> <li>• Will destroy the historic character of Worsley and Roe Green.</li> </ul>
<b>Other</b>
<ul style="list-style-type: none"> <li>• Adverse impact on the Bridgewater canal, its users and the associated wildlife.</li> <li>• Area provides a buffer to major infrastructure nearby.</li> </ul>

- Negative impact on the attractiveness of the area, quality of life, and residential amenity as a result of a number of issues including those set out above, overcrowding and increased crime levels.
- Criticism of consultation process undertaken.

## **Response to Comments**

### **Principle / scale of development**

- The site selection paper identifies that the East of Boothstown allocation meets criterion 7 (land that would deliver significant local benefits by addressing a major local problem/issue)
- The Greater Manchester housing requirement is calculated using the government's standard local housing need methodology as required by the government's planning practice guidance. This requires the use of the 2014 based-household projections.
- There has been redistribution of some of the local housing need that arises in the rest of Greater Manchester to Salford reflecting significant opportunities within the centre of the conurbation (and the market for high density apartments). The Housing Topic Paper explains further how the housing requirements have been calculated.
- The government is consulting on changes to the local housing need methodology, that would involve using the most recently published projections. Given this is only a consultation and subject to potential changes, the need for housing in GM uses the current methodology (i.e. which uses 2014-based projections as the starting point).
- Masterplan requirement will allow local community to be involved in how the site will be developed. The Revised Draft GMSF required that any masterplan or SPD should be adopted by the city council. This has been amended so that the requirement for a masterplan does not need adopting by the city council, rather it has to be considered acceptable by the city council (see criterion 1 of the allocation policy).

### **Housing (including affordable housing)**

- The allocation provides one of only a few opportunities within Greater Manchester to deliver very high value housing in an extremely attractive environment, benefitting from an established premium housing market and a location next to the RHS Garden Bridgewater and the Bridgewater Canal.
- The site will be required to provide 50% affordable housing overall (some of this will be on-site and some will be directed to off-site provision).
- A viability assessment has been prepared for the site by Three Dragons which demonstrates that the site can support 50% affordable housing. This forms part of the evidence base for the GMSF.

### **Employment and Economy**

- Comments noted.

### **Green Belt**

- The allocation would result in the loss of 30 ha Green Belt, but there will be a net gain in Salford of 29ha overall as some additions to the Green Belt are also proposed in Salford in the GMSF.
- The need to deliver the long-term positive outcomes of the Greater Manchester Strategy is considered to amount to exceptional circumstances which justify altering the boundaries of the Green Belt. The case for exceptional circumstances is explained further in the Green Belt topic paper.
- The allocation will incorporate green infrastructure and be built at a low density. The GMSF allocation policy requires that the development retains Alder Wood and Shaw Brook, provides a landscape buffer to RHS Bridgewater and accommodates walking/cycling routes through the site, and also provides sustainable drainage areas, a neighbourhood equipped play area and allotments (criteria 3, 4, 5, 7, 10, 12, 13, 14).

- An assessment of Green Belt harm resulting from the release of GMSF allocations has been undertaken. It identifies that the release of this allocation would cause 'moderate' harm to Green Belt purposes and 'no/negligible' harm to adjacent Green Belt.

#### **Brownfield**

- The GMSF sets out a brownfield preference approach.
- The supply of dwellings on brownfield land and vacant buildings has been maximised, as set out in the Housing Topic Paper and the city council's Housing and Economic Land Availability Assessment.
- Account has been taken of brownfield sites (including opportunities within town centres) that will emerge over the plan period where there is current evidence that this will happen.

#### **Transport – Highways / Public Transport / Cycling / Walking**

Locality Assessments have been undertaken to confirm the transport impacts of the allocations. These will be published alongside the Publication GMSF. The Locality Assessment for this site notes:

- The potential to extend bus services to allow services terminating at Worsley Courthouse to extend to RHS Bridgewater, with the potential to allow for interchange with Metrolink in Eccles.
- That the nearest Vantage stops are within 1km of the site and explains that the potential to expand and improve rapid transit services is being explored by TfGM.
- Concludes that this allocation is deliverable and that the traffic impacts are less the severe (the test in the NPPF). Whilst the modelling forecasts that some junctions may experience capacity issues, they are not significantly worse than without the allocation. The modelling work presents a 'worst case' scenario and does not reflect opportunities to secure a mode shift to active travel.
- The junction with Occupation Road was improved to provide access to the RHS Bridgewater and is now a large signalised junction which could serve both developments.
- The site offers one of a small number of opportunities within Greater Manchester to deliver very high value housing in an attractive environment, attract skilled workers and boost competitiveness. This site was selected for inclusion within the GMSF based on criterion 7 (Land that would deliver significant local benefits by addressing a major local problem/issue) of the GMSF site selection criteria.
- The scope of the next phase of the North West Quadrant Study is to be agreed with the Department for Transport and awaiting the conclusions of this work would have significant implications for the GMSF timetable.
- Additions have been made to the GMSF allocation policy to expand the requirements in respect of pedestrian and cycling connectivity i.e. the provision of a high-quality network of pedestrian and cycle routes through the site; off-site pedestrian crossings and a footpath adjacent to the site on the south side of Leigh Road.

#### **Physical Infrastructure and utilities**

- It is not considered that the site is subject to any significant utilities constraints. The GMSF site allocation policy requires that the development provides an easement for the significant utilities infrastructure running through the site. Some infrastructure reinforcement may be required and this will need to be assessed at the masterplanning stage.

#### **Social Infrastructure**

- The allocation will be required to make appropriate contributions to address its impacts in accordance with policy PC1 (Planning obligations) Salford Local Plan: Development Management Policies and Designations (January 2020) once it is adopted.
- The allocation will be subject to masterplanning in accordance with the GMSF site allocation policy criterion 1. Through this process, Policy HH2 (Provision of health and social care facilities) of the Publication Salford Local Plan: Development Management Policies and Designations (January 2020) requires that appropriate provision is made for primary health care facilities.
- The GMSF allocation policy requires that the development incorporates a neighbourhood equipped play area and allotments (criteria 12 and 14).

#### **Environmental – Green Infrastructure, Biodiversity, open space**

- The majority landowner has completed an Agricultural Land Classification and Soil Resources appraisal which will be published for information alongside the Publication Draft GMSF.
- The GMSF allocation policy requires that the playing fields within the site are either retained or replaced (criteria 13).
- It is not considered that the site presents any significant ecological constraints, subject to appropriate mitigation measures being taken. Where considered relevant, specific issues that need to be addressed have been identified in the GMSF site allocation policy, these include criteria 3, 4, 8 and 9. These matters will be considered in more detail at the masterplanning stage. The majority landowner has completed an ecological appraisal which will be published for information alongside the Publication Draft GMSF.
- The site will be required to deliver a minimum 10% net gain in biodiversity.
- The GMSF site allocation policy ensures that that key green infrastructure features such as Alder Wood and Shaw Brook are retained and that a landscaped buffer to the eastern boundary of the site will be provided as well as areas of green infrastructure sustainable drainage (criteria 3, 4, 5 and 7).
- Allotments provide a wide range of benefits to site users and the wider environment. The city council aims to expand the number of plots in the city having regard to rising waiting lists and anticipated growth in demand. The requirement for allotment provision within the site allocation reflects the standards in the Salford Greenspace Strategy Supplementary Planning Document 2019.

#### **Air Quality**

- The Air Quality Management Area associated with Leigh Road runs along the site's northern boundary. It is not considered that the site presents any significant air quality constraints, subject to appropriate mitigation measures being taken. These matters will be considered in more detail at the masterplanning stage and an air quality impact assessment will be required when a planning application is submitted.
- Criterion 10 of the GMSF site allocation policy requires that the developments is designed to ensure good quality access by walking and cycling to nearby local bus services to encourage the use of nearby public transport services.
- Various policies within Greater Manchester's Transport Strategy 2040 are aimed at improving air quality across the Region. Greater Manchester is also releasing a Clean Air Plan for consultation coinciding alongside release of the GMSF.

#### **Flood risk**

- The site is subject to some fluvial and surface water flood risk and the city council has been working with the landowner and the Environment Agency to consider this. The specific issues that need to be addressed have been identified in the GMSF site allocation policy (criteria 6 and 7). These matters will be considered in more detail at the masterplanning stage. The majority landowner has completed a flood risk appraisal

which will be published for information alongside the Publication Draft GMSF. A Strategic Flood Risk Appraisal will also be published as part of the GMSF evidence base.

#### **Heritage**

- The heritage appraisal for the site allocation (published in 2019) concludes that development is unlikely to result in any harm to the setting and significance of any of the heritage assets in the vicinity. It was not considered that the character of the Worsley Village or the Roe Green Beesley Green Conservation Areas would be affected given their distance from the proposal site.
- The majority landowner has also completed a heritage appraisal which will be published for information alongside the Publication Draft GMSF.

#### **Other**

- The development will be required to secure improvements to the pathways on the Bridgewater Canal (criteria 11) in order to improve the walking and cycling routes along it. The site will also be required to deliver a minimum 10% net gain in biodiversity.
- The allocation will be built at low density and incorporate areas of green infrastructure and a landscape buffer to the RHS Bridgewater.
- The development shall be designed to minimise the fear or and opportunities for crime and provide surveillance in accordance with the Publication Salford Local Plan: Development Management and Designations (January 2020) policy D6 (Design and Crime).
- There have been two formal periods of consultation on the GMSF prior to the Publication Plan (Draft and Revised Draft stages). Consultation has included documents being available on the GMCA website, social media posts, community committee meetings etc. Consultation has been carried out in accordance with the city council's adopted Statement of Community Involvement.

### **GM Allocation 32 North of Irlam Station (1,421 comments)**

A significant number of respondents were opposed to the principle of releasing Green Belt for new housing, and that the changes to the Green Belt would result in boundaries that not readily recognisable as required by the National Planning Policy Framework, and set a precedent for the release of additional Green Belt land on the mosslands. Moreover, it was identified that the site is Grade 1 agricultural land, provides a ‘green lung’, and is land that is well used for recreation. Objection was also raised to building on peat given it performs as a carbon sink, whilst it was noted that it may be very difficult to build on peat as a result of land instability (and that this this will have an impact on the viability of developing the site). As an alternative brownfield sites should be developed, whilst it was also highlighted that additional brownfield sites will become available over the course of the plan period that have not currently been identified

A significant number of comments related to the exacerbation of existing issues of congestion / gridlock, particularly in peak times, and the fact that there is only ‘one road in and one road out’ of Irlam/Cadishead. The issue of traffic congestion is also exacerbated when there is an accident on the M62/M6, whilst account also needs to be had of the cumulative impact of other developments, such as Port Salford and housing development at Carrington, and events being held at the AJ Bell Stadium. Linked to this, it was commented that air pollution would be worse as a result of new development given the additional number of cars, whilst accessing any new development would be problematic given the nature and width of the roads that would be likely to provide access to the site.

It was noted by many that part of the rationale for the allocation appears to be its proximity to Irlam Train Station; however it was remarked that there is lack of car parking at the station, services are already poor / overcrowded, and the station is not accessible to all.

A large number of representations stated that biodiversity of the moss will be seriously impacted by development, with adverse impacts on priority species and habitats of importance at the national, GM and local level. A number of other negative impacts on the area were identified, including a lack of capacity in community infrastructure, the need to relocate existing businesses, a potential drop in property values, and increased crime.

<p><b>Principle / scale of development</b></p> <ul style="list-style-type: none"> <li>• Question the need for the scale of new dwellings in Salford with reference to issues including validity of government targets in light of Brexit, immigration control, the use of out of date data (i.e. using 2014 based household projections instead of the 2016 ones), and given the proposed scale of the development of new homes at Carrington.</li> <li>• No justification as to why the housing requirement for Salford is in excess of its household projections / local housing need calculation.</li> <li>• The number of developments proposed should be reduced by 50% so that the total growth of new dwellings in Irlam and Cadishead over the plan period does not exceed 15% of the current number.</li> <li>• Concern over the cumulative impact of development when consideration is given to other developments in the local area that have been completed recently.</li> </ul>
<p><b>Housing (inc affordable housing)</b></p> <ul style="list-style-type: none"> <li>• General support for the provision of 25% affordable housing, although this may not be viable due to the depth and cost of building on peat.</li> <li>• The homes will not in general be affordable to local people.</li> <li>• Need for more social housing, bungalows / apartments for rent, and adapted homes for the elderly and disabled.</li> </ul>

<ul style="list-style-type: none"> <li>• Most of the growth will be in single persons households who should be accommodated in the inner cities / City Centre, not in the suburbs.</li> <li>• If all of the site was delivered at 75 dwellings per hectare then there would be the need to release only 21 hectares of land, instead of the proposed 65 hectares.</li> </ul>
<p><b>Green Belt</b></p> <ul style="list-style-type: none"> <li>• Object to the loss of Green Belt. Issues identified included a lack of exceptional circumstances, loss of role as a 'green lung', setting of a precedent, the boundaries of the proposed development site not being readily recognisable, and development leading to urban sprawl .</li> <li>• Although the amount of land to be released through the allocation has been reduced from the Draft GMSF, the vast majority of Green Belt land to be released in Salford would remain as being in the Irlam / Cadishead area.</li> </ul>
<p><b>Brownfield</b></p> <ul style="list-style-type: none"> <li>• Focus should instead be on available brownfield sites and vacant buildings; these sites mean that the release of Green Belt is not necessary.</li> <li>• Need to take account of new brownfield sites that will emerge during the plan period.</li> </ul>
<p><b>Transport – Highways / Public Transport / Cycling / Walking</b></p> <ul style="list-style-type: none"> <li>• Lack of suitable access points into the site.</li> <li>• Most new infrastructure in the area will not be completed before 2026.</li> <li>• Inadequate public transport links, including issues of overcrowding and reduced bus services.</li> <li>• Irlam train station is not fully accessible, has insufficient car parking, has poor facilities with services often cancelled or are short of the number of required carriages; cannot assume all of those living in the proposed development would use the train.</li> <li>• Scale of allocation is likely to give rise to traffic impacts on both an individual and cumulative level on the strategic route network.</li> <li>• There would be a large number of additional cars as a result of development; this would be exacerbated by the proposed allocations at Carrington and Port Salford.</li> <li>• There is only one road in and out of the area, with traffic already gridlocked as a result of congestion. This worsens when there are events on at the AJ Bell Stadium, or accidents on the M62 / M6.</li> <li>• Traffic problems associated with the construction of the development, including congestion and disruption.</li> </ul>
<p><b>Social Infrastructure</b></p> <ul style="list-style-type: none"> <li>• Concerns relating to the existing capacity of community infrastructure (including schools, doctors, dentists, emergency services, shops and services for younger people) and the potential to support new homes.</li> <li>• A new health facility should be provided as part of the development.</li> <li>• Development of the site combined with other very large scale developments nearby (such as Carrington) would mean that it is unlikely existing secondary schools would have capacity.</li> <li>• Welcome the requirement for land to be set-aside for additional primary school provision on the site.</li> </ul>
<p><b>Environmental – Green Infrastructure, Biodiversity, open space</b></p> <ul style="list-style-type: none"> <li>• Concerns relating to loss of grade 1 agricultural land, which makes up only 2% of the agricultural land in the country.</li> <li>• Negative impact / loss of wildlife and habitats including those of importance at the national, Greater Manchester and local level.</li> <li>• The land is a green lung for Salford, and should be designated as a national park.</li> <li>• Concerns regarding loss of green space / recreation opportunities due to development, and the impact this has on mental health and well-being.</li> <li>• Benefits of developing the site do not outweigh the negative environmental implications</li> </ul>



<ul style="list-style-type: none"> <li>• Building on / extracting peat is contrary to objective 7 and policies GM-S 2 (carbon and energy), GM-G 2 (green infrastructure network) and GM-G 10 (net enhancement of biodiversity and geo diversity) of the GMSF and the National Planning Policy Framework.</li> <li>• Allocation provides opportunities to secure net gains for nature and local communities (in terms of green infrastructure, protected species and ecology).</li> <li>• Reassurance needed to ensure that the site does not impact upon Manchester Mosses Special Area of Conservation, and sites of special scientific interest.</li> </ul>
<b>Air Quality</b>
<ul style="list-style-type: none"> <li>• Development will worsen existing issues of poor air quality including through traffic, loss of green infrastructure and building on deep lying peat which acts as a carbon sink.</li> <li>• There are already Air Quality Management Areas in the local area.</li> </ul>
<b>Flood risk</b>
<ul style="list-style-type: none"> <li>• There is a shallow water table in the area.</li> <li>• Development will increase flood risk, and increase run-off.</li> <li>• Additional wording should be added to the policy to promote the use of sustainable urban drainage systems to control the rate of surface water run-off.</li> </ul>
<b>Other</b>
<ul style="list-style-type: none"> <li>• Land will be difficult to build on given the deep peat; in some parts of the site it is estimated to be 30m deep.</li> <li>• Criticism of consultation process undertaken.</li> <li>• Query what provision has been made for relocating existing businesses and jobs, particularly the horticultural business.</li> <li>• Noise pollution as a result of the building process, would particularly impact on St Theresa's School and the college.</li> <li>• Potential hydrology issues relating to Chat Moss and the GM Wetland Nature Improvement Area and the Manchester Mosses Special Area of Conservation; detailed hydrological assessment required.</li> </ul>
<b>Response to Comments</b>
<b>Principle / scale of development</b> <ul style="list-style-type: none"> <li>• The site selection paper identifies that the North of Irlam Station allocation meets criterion 1 (Land which has been previously developed and/or land which is well served by public transport).</li> <li>• The Greater Manchester housing requirement is calculated using the government's standard local housing need methodology as required by the government's planning practice guidance. This requires the use of the 2014 based-household projections.</li> <li>• There has been redistribution of some of the local housing need that arises in the rest of Greater Manchester to Salford reflecting significant opportunities within the centre of the conurbation (and the market for high density apartments). The Housing Topic Paper explains further how the housing requirements have been calculated.</li> <li>• The government is consulting on changes to the local housing need methodology, that would involve using the most recently published projections. Given this is only a consultation and subject to potential changes, the need for housing in GM uses the current methodology (i.e. IT uses 2014-based projections as the starting point).</li> <li>• The number of dwellings in the Publication version of the GMSF for the North of Irlam allocation is 1,100 potentially increasing to 1,400 subject to further evidence in relation to transport impacts. This has been reduced from 2,250 and 1,600 dwellings at the earlier Draft and Revised Draft stages respectively. The</li> </ul>

capacity identified is considered an appropriate number, and seeks to ensure that advantage is taken of the sustainability of the site with regards to proximity to Irlam Train Station (with all dwellings proposed being within around 800m of the station).

- A transport locality assessment has been prepared for the site which looks at the cumulative impacts of development. In addition, social infrastructure will be required as part of any development where this is necessary (see below for further details).

#### **Housing (including affordable housing)**

- A viability assessment has been undertaken for the site by Three Dragons which has concluded that the site is viable for 25% affordable housing for 1,100 and 1,400 dwellings (the same % as at the Revised Draft stage in 2019). This is available as part of the evidence base. It includes costs as a result of building on peat (over and above normal build costs), with this being informed by ground investigations, and advice from the Core Investment team at the GMCA and Deep Soil Mixing who are a company that specialise in bringing sites with abnormal ground conditions forward.
- The inner cities and the City Centre (including City Centre Salford) are delivering significant proportion of housing development that is needed across Greater Manchester. There is a need to provide houses for families as well as for smaller households, in order to meet differing needs and ensure that there is a good range in the type and size of accommodation.
- Part of the site will be developed for apartments at around 70 dwellings per hectare (land closest to the train station). A reason for why the site is allocated is in order to increase the supply of houses in Salford; 75 dwellings per hectare for houses is unlikely to be achievable (with a minimum density of 35 dwellings per hectare set out in the GMSF). In addition, account needs to be had of the potential need for a school on the site, and other policy requirements / open spaces etc.

#### **Green Belt**

- The allocation would result in the loss of 67 ha Green Belt, but there will be a net gain in Salford overall of 29ha as some additions to the Green Belt are also proposed in the GMSF.
- The need to deliver the long-term positive outcomes of the Greater Manchester Strategy is considered to amount to exceptional circumstances which justify altering the boundaries of the Green Belt. The case for exceptional circumstances is explained further in the Green Belt topic paper.
- The allocation will incorporate high levels of green infrastructure throughout the site and key landscape features will be retained. The GMSF allocation policy requires that the development accommodates walking/cycling routes through the site, and also provides sustainable drainage areas, a neighbourhood park, an equipped play area and allotments (criteria 6, 8, 10, 14, 16 and 17).
- This site has been selected for development on the basis of criterion 1 (Land which has been previously developed and/or land which is well served by public transport) of the assessment criteria. Its location next to the railway station means that it provides easy access to a large number of employment and other opportunities.
- An assessment of Green Belt harm resulting from the release of GMSF allocations has been undertaken. It is identified that the release of this allocation would cause 'moderate' harm to Green Belt purposes and 'no/negligible' harm to adjacent Green Belt.

### **Brownfield**

- The GMSF sets out a brownfield preference approach.
- The supply of dwellings on brownfield land has been maximised as set out in the Housing Topic Paper, and the city council's Housing and Economic Land Availability Assessment.
- Account has been taken of brownfield sites that will emerge over the plan period where there is current evidence that this will happen.

### **Transport – Highways / Public Transport / Cycling / Walking**

Locality Assessments have been undertaken to confirm the transport impacts of the allocations. These will be published alongside the Publication GMSF. The Locality Assessment for this site:

- Notes that Astley Road and Roscoe Road provide suitable primary access with New Moss Road providing secondary access. Widening, traffic management measures and a replacement bridge at New Moss Road may be required. The GMSF site allocation policy states that vehicle access to the site should not have an unacceptable impact on the quality of existing residential areas (criterion 9).
- Explains that there are plans to improve the capacity and frequency on the Manchester – Liverpool (via Warrington) line (referred to as the CLC corridor). The Transport Strategy 2040 Draft Delivery Plan also indicates that TFGM will work with the rail industry to deliver a continued programme of rail station accessibility and customer facilities improvement. The GMSF allocation policy includes a requirement for the allocation to include a new direct pedestrian and cycle route to Irlam Station from the west and enhance cycle parking and car parking facilities at the station (criterion 8).
- Concludes that this allocation is deliverable and that the traffic impacts are less the severe. Whilst the modelling forecasts that some junctions may experience capacity issues, they are not significantly worse than without the allocation. The assessment identifies some mitigation measures to improve the performance of local junctions. The modelling considers the impacts of the site in context with other nearby sites. The modelling work presents a 'worst case' scenario and does not reflect opportunities to secure a mode shift to active travel. The GMSF site allocation policy requires that the development minimises the impact on local highways and provides contributions to support the improvement of affected local junctions (criterion 7).
- Policy PH1 of the Publication Salford Local Plan: Development Management Policies and Designations (January 2020) includes a requirement for all major development to be implemented in accordance with a construction environmental management plan which shall identify how the development will mitigate/minimise effects.

### **Social Infrastructure**

- The allocation will be required to make appropriate contributions to address its impacts in accordance with policy PC1 (Planning obligations) Salford Local Plan: Development Management Policies and Designations (January 2020) once it is adopted.
- The allocation will be subject to masterplanning in accordance with the GMSF site allocation policy criterion 1. Through this process, Policy HH2 (Provision of health and social care facilities) of the Publication Salford Local Plan: Development Management Policies and Designations (January 2020) requires that appropriate provision is made for primary health care facilities.
- The requirement for the development to set-aside land for additional primary school provision (unless sufficient additional school places can be provided off-

site) is retained in the GMSF. The detail regarding school provision will be determined at the planning application stage.

- If there was an identified need for secondary school provision as a result of this allocation, then this would be considered at the masterplanning / planning application stage.

#### **Environmental – Green Infrastructure, Biodiversity, open space**

- Agricultural land data suggests that majority of the site comprises grade 1 agricultural land (grades 1 to 3a are defined as the best and most versatile agricultural land). Given the overall scale of development that needs to be accommodated, a limited amount of development on high grade agricultural land is proposed in the GMSF and considered necessary to meet development needs. An agricultural land survey would allow the significance of the loss to be better understood and weighed against the benefits of development.
- Central to the masterplan required under criterion 1 shall be the consideration of opportunities to restore habitats, strengthen ecological networks, and manage the carbon and hydrological implications of development, having regard to the presence of peat on this site. A robust delivery strategy will also need to be prepared with key stakeholders (criterion 2).
- The development will be required to incorporate high levels of green infrastructure and recreation facilities including a neighbourhood park, allotments and public walking and cycling routes through the site (criteria 6, 10, 16 and 17).
- The process for designating a national park would be outside of the GMSF process and would be determined by Natural England under the National Parks and Access to the Countryside Act 1949.
- It is understood that the area is important for farmland birds and other wildlife. GMEU advised that the birds are vulnerable to disturbance and rely on open sight lines such that it would be preferable to reduce the area allocated. The allocation is smaller in area than that proposed in the Draft GMSF. The Publication GMSF site allocation policy also requires that the site is supported by breeding and winter bird surveys (criterion 12).
- It is not considered that the site presents any significant ecological constraints, subject to appropriate mitigation measures being taken. Where considered relevant, specific issues that need to be addressed have been identified in the GMSF site allocation policy, these include criteria 5, 10, 11, 12 and 13. These matters will be considered in more detail at the masterplanning stage. An ecological appraisal of the site and a green infrastructure, landscape and watercourses note will be published for information alongside the Publication Draft GMSF. The site will be required to deliver a minimum 10% net gain in biodiversity.
- A Ground Investigations report has been prepared which identifies possible construction methods having regard to the ground conditions. This will be published for information alongside the Publication Draft GMSF. This report does not consider excavation of peat as a suitable ground stabilisation method due to its environmental impacts. The GMSF allocation policy requires development to minimise the loss of the carbon storage function of the peat (criterion 5). Work will be undertaken to investigate in broad terms the carbon implications of construction using the ground improvement methods identified in the ground conditions survey.
- The GMSF site allocation policy requires that the development is supported by a project specific Habitats Regulations Assessment (criterion 13).

### **Air Quality**

- The Air Quality Management Area associated with the M62 is located to the north of the allocation. It is not considered that the site presents any significant air quality constraints, subject to appropriate mitigation measures being taken. These matters will be considered in more detail at the masterplanning stage and an air quality impact assessment will be required when a planning application is submitted.
- Criterion 8 of the GMSF site allocation policy requires that the developments is designed to ensure good quality access by walking and cycling to Irlam rail station to encourage the use of nearby public transport services.
- Various policies within Greater Manchester's Transport Strategy 2040 are aimed at improving air quality across the Region. Greater Manchester is also releasing a Clean Air Plan for consultation coinciding alongside release of the GMSF.

### **Flood risk**

- The site lies entirely within flood zone 1 and it is not considered to present any significant flood risk constraints. The GMSF site allocation policy requires that the development incorporates green sustainable drainage to control surface water run-off (criterion 14). These matters will be considered in more detail at the masterplanning stage. A Strategic Flood Risk Assessment will also be published for information alongside the Publication Draft GMSF.

### **Other**

- Site investigations undertaken in 2019, comprising borehole sampling and analysed and ground gas monitoring. Shows peat depths are between 0.70 metres and 4.45 metres below ground on the site, increasing from the southwest to the northeast of the site.
- There is no reason to conclude the site cannot be developed using alternative foundation technologies (for example soil mixing). The most appropriate solutions will be considered at the detailed design stage.
- The costs associated with the construction methods likely to be required have been considered and estimated at being around £23.9m for 1,100 dwellings, rising to £29.4m for 1,400 dwellings.
- There have been two formal periods of consultation on the GMSF prior to the Publication Plan (Draft and Revised Draft stages). Consultation has included documents being available on the GMCA website, social media posts, community committee meetings etc. Consultation has been carried out in accordance with the city council's adopted Statement of Community Involvement.
- Noise pollution during construction phases would be considered through the masterplanning and planning application stages.
- The allocation policy has been amended to refer to the need to undertake a hydrological assessment (criterion 5).

### **GM Allocation 33: Port Salford Extension** (148 comments)

The majority landowner supports the allocation and proposes its expansion on land to the west to increase the floorspace accommodated to around 343,000sqm. Consider amendments are needed to the policy criteria to remove onerous, unnecessary and over prescriptive requirements.

Objections received were significant fewer in number than other allocations in the city however the largest numbers related to issues of traffic congestion and associated issues of air pollution. Reference was made to a lack of progress on the infrastructure committed as part of the permitted Port Salford and the need for improved connections. A number of reps questioned the extent users would rely on rail and water connections.

Concerns were also raised in respect of the need for the scheme post-Brexit, the availability of brownfield alternatives, loss of Grade 1 agricultural land, loss of Green Belt and Green infrastructure, loss of habitats (including protected species), the potential release of carbon from development on peat and the proposals compatibility with nature improvement area objectives and potential impact on the Manchester Mosses Special Area of Conservation.

<b>Principle / scale of development</b>
<ul style="list-style-type: none"> <li>• Support for the allocation and the principle of an integrated tri-modal facility.</li> <li>• Technical analysis demonstrates that there are no technical or overriding environmental constraints to developing the site.</li> <li>• Propose westwards expansion of the proposed allocation to increase the development potential from 320,000sqm to 516,300sqm of employment development.</li> <li>• An allowance for supporting uses and amenities should be added to the policy.</li> <li>• Site should be considered after giving priority to the main Port Salford site</li> <li>• Sheer scale of development is unacceptable.</li> <li>• Currently too many unknowns, for example is there a definitive time frame on the multimodal Port Salford?</li> <li>• The expansion would further blight Barton, once a pleasant rural area. Any development should be limited to the South and West of Tunnel Farm</li> <li>• Removal of the designation would allow the land owner to put forward planning applications that the council would be powerless to resist.</li> <li>• Release of the site is premature without infrastructure associated with the permitted Port Salford in place.</li> <li>• Marriots Farm should be removed from the allocation boundary but taken out of the Green Belt.</li> <li>• Why not have housing provisions too?</li> </ul>
<b>Housing (inc affordable housing)</b>
<ul style="list-style-type: none"> <li>• Oppose the development on grounds of loss of residential amenity</li> </ul>
<b>Employment and Economy</b>
<ul style="list-style-type: none"> <li>• Site will meet the specific locational demands of the growing logistics sector and support economic growth in Greater Manchester in accordance with the strategic objectives of the Revised Draft GMSF with significant employment, GVA and business rate gains.</li> <li>• Question requirement for the development with reference to a more realistic economic ambition and the potential impact of Brexit</li> <li>• Site would not deliver a large number of jobs due to the nature of the development, automation, robotics etc</li> </ul>

<p><b>Green Belt</b></p> <ul style="list-style-type: none"> <li>• No strategic need to deallocate Green Belt if the port is essential as this would provide the very special circumstances to override the policy protection.</li> <li>• Object to the loss of Green Belt. Issues identified included a lack of exceptional circumstances, loss of role as a 'green lung', setting of a precedent, and settlements merging</li> <li>• Contribution to Green Belt purposes is limited and far outweighed by the economic benefits. Site is separated from the wider Green Belt by the M62 which will form a long term defensible boundary, is surrounded on all sides by urbanising features which are part of a contiguous urban area, and has an urban-fringe character.</li> <li>• Special circumstances exist to justify releasing the site from the Green Belt to meet the specific locational demands of the growing logistics sector and support economic growth in Greater Manchester in accordance with the strategic objectives of the Revised Draft GMSF.</li> <li>• Should be a greater emphasis on making a significant Green Belt strip between the site and Irlam.</li> </ul>
<p><b>Brownfield</b></p> <ul style="list-style-type: none"> <li>• Focus should instead be on available brownfield sites including those in Trafford Park.</li> </ul>
<p><b>Transport – Highways / Public Transport / Cycling / Walking</b></p> <ul style="list-style-type: none"> <li>• Development will exacerbate significant existing issues of congestion on nearby local road network (with reference made to there being only one road through the area) and strategic roads (M60) including the cumulative impact of planned housing in Irlam and Carrington.</li> <li>• Insufficient information has been provided about the impact on the Strategic Road Network, scale of development likely to give rise to significant traffic impacts on both an individual and cumulative level.</li> <li>• Insufficient/ inadequate transport infrastructure in place.</li> <li>• Lack of detail regarding transport infrastructure improvements.</li> <li>• Comments questioning the delivery and timing of the infrastructure linked to the permitted Port Salford.</li> <li>• Phasing of the site needs to be linked to the delivery of the permitted Port Salford.</li> <li>• The allocation will support the business case for infrastructure improvements including proposed link road from the A57 to the M62; expansion of Trafford Park Metrolink; Park and Ride and Junction 12 of the M60; and a new Western Gateway Rail station.</li> <li>• Concerns that users may not rely equally on road water and rail based modes. Policy should support equal shares and limit volume of HGV movements to ensure it really is a tri-modal facility.</li> <li>• Insufficient investment in quays and docks to remove road traffic.</li> <li>• Plan to use the Ship Canal for transportation is good but probably not feasible given the unloading necessary in Liverpool.</li> <li>• Welcome opportunity to bring product down the ship canal taking traffic off the road network.</li> <li>• The policy requirement for canal berths is not justified, their timing will be market led. The site will be multi-modal by virtue of rail and road access.</li> <li>• Requirement for a single point of access from the A57 is unnecessarily prescriptive and not justified by technical evidence.</li> <li>• Policy should refer to delivery of 'necessary' highway improvements required only to mitigate the effects of the proposed development in line with national policy.</li> <li>• The site needs direct access to the M62.</li> <li>• Bus services through the area are delayed and/or cancelled due to congestion.</li> <li>• Concerns in relation to impacts on road safety.</li> </ul>

<ul style="list-style-type: none"> <li>• Support for a Metrolink extension to and through the area.</li> <li>• Supportive of a new station to enable more sustainable travel.</li> </ul>
<p><b>Social Infrastructure</b></p>
<ul style="list-style-type: none"> <li>• Concerns relating to the capacity of community infrastructure (including schools, doctors, dentists, and other basic amenities)</li> </ul>
<p><b>Environmental – Green Infrastructure, Biodiversity, open space</b></p>
<ul style="list-style-type: none"> <li>• Technical analysis demonstrates that there are no technical or overriding environmental constraints to developing the site.</li> <li>• Object to loss of agricultural land.</li> <li>• Concerns regarding loss of green space / recreation opportunities.</li> <li>• Negative impact/ loss of wildlife and habitats including protected species.</li> <li>• Barton Moss is an integral part of the wider Chat Moss ecological network.</li> <li>• The absence of any accompanying analysis of the natural capital of this allocation, and specifically of its habitats &amp; species of principal importance and its ecological networks, preclude further objective nature conservation comment on the justification for the selection of this site.</li> <li>• Further information is required, to understand how the site will support the objectives of the Great Manchester Wetlands NIA (Point 13). Would like to see habitat restoration and re-wetting in this location.</li> <li>• Detailed hydrological modelling is required to determine any hydrological connectivity from this site and other designated sites.</li> <li>• Development of the site is not compatible with the Nature Improvement Area objectives and therefore does not comply with GMSF Policy GM-G10</li> <li>• Further reassurance is needed to ensure that the site does not impact upon Manchester Mosses Special Area of Conservation.</li> <li>• Concerned that the capacity of the environment is at its limit.</li> <li>• Allocation provides opportunities to secure net gains for nature and communities.</li> <li>• Opportunity to demonstrate an exemplar development using green infrastructure designed to support biodiversity and strengthen coherent ecological networks beyond the site boundary.</li> <li>• Ecological net gains should be sought as well as sensitively designed green infrastructure that will reduce the impact of any species fragmentation.</li> <li>• The requirement to maximise biodiversity is not justified and inconsistent with national policy, the policy should instead require a net gain.</li> <li>• The requirement to enhance surrounding habitats is not justified</li> <li>• Concerns relating to loss of carbon storage function of peat and implications of developing it for climate change.</li> <li>• Development would be visually intrusive in its open rural location</li> <li>• There should be more emphasis placed on retaining woodlands and hedgerows and their role as a mitigating feature</li> <li>• Loss of the golf course has had a detrimental impact on the local community.</li> <li>• The requirement in relation to compensation for the loss of the golf course requires further clarification</li> <li>• The requirement to compensate for the loss of the golf course, which is now closed and no shortage of alternative provision, is not justified or consistent with national policy.</li> <li>• Welcome statement in respect of making positive use of the Green Belt including by expanding the facilities at Brookhouse Playing fields.</li> </ul>
<p><b>Air Quality</b></p>
<ul style="list-style-type: none"> <li>• Development will lead to exacerbation of existing issues of poor air quality including through traffic, loss of green infrastructure and development of peat land.</li> <li>• Area has high level of chronic breathing issues.</li> </ul>



<b>Flood risk</b>
<ul style="list-style-type: none"> <li>Reference should be made to Sustainable Urban Drainage Systems.</li> </ul>
<b>Heritage</b>
<ul style="list-style-type: none"> <li>It is not necessary or justified to require improvements in public understanding of Barton Aerodrome as a historic asset. The term is vague, potentially excessive and not in accordance with national policy.</li> </ul>
<b>Other</b>
<ul style="list-style-type: none"> <li>No justification for requiring that a masterplan is developed with the community. Requirement is unduly onerous and would be likely to lead to delays, policy should refer instead to a masterplan being prepared in consultation with the local community.</li> <li>In respect of requirements in relation to community engagement, remove terms 'high level' and 'frequent' which are unclear, unjustified and unduly onerous in terms of preparing a planning application.</li> <li>Huge disruption during building and once up and running.</li> <li>Object to change in character of the area.</li> <li>Criticism of consultation process undertaken.</li> </ul>
<b>Response to Comments</b>
<p><b>Principle / scale of development</b></p> <ul style="list-style-type: none"> <li>The site selection paper identifies that Port Salford extension meets criteria 2, 5 and 6.</li> <li>It is agreed with the majority landowner that there are no technical or overriding environmental constraints to developing the site; these issues will be considered in more detail through the masterplanning / planning application processes.</li> <li>Justification to the policy explains that the retention of the Green Belt to the west and east of the site will help to prevent the coalescence of Irlam and Eccles, and that even with the retention of part of the Green Belt, the scale of the development is likely to have a significant visual impact, and it will be very important for it to be integrated into the landscape as far as possible, particularly through the provision of high quality green infrastructure.</li> <li>The policy states that the site will be developed for employment floorspace with a strong focus on logistics activities but also incorporating high quality manufacturing floorspace. Some supporting uses and amenities may be considered appropriate as part of the masterplanning process.</li> <li>The scale of development responds to the tri-modal opportunities that the site will benefit from (and is unique in Greater Manchester).</li> <li>Discussions are ongoing between the landowner and Network Rail with regards to serving the site by rail.</li> <li>Criterion 3 of the policy is clear that development of the extension to Port Salford cannot be commenced until the rail link, highway improvements, canal berths and container terminal associated with the permitted Port Salford scheme have been completed and are operational.</li> <li>If the land was removed from the Green Belt, any planning application would have to be determined in accordance with the GMSF allocation policy (with this forming part of Salford's development Plan).</li> <li>The boundary of the allocation has been amended to remove Marriot's farm.</li> <li>Given the tri-modal opportunities that the site will benefit from it is considered important to maximise this for employment use, rather than also make provision for housing.</li> <li>Justification for the allocation and approach to employment development is set out in the Employment Topic Paper and the Site Topic Paper.</li> </ul>

### **Housing (including affordable housing)**

- Issues relating to residential amenity would be considered at the masterplanning and planning application stages.

### **Employment and Economy**

- Comments noted with regards to the site meeting the specific locational demands of the growing logistics sector and support economic growth in Greater Manchester.
- The methodology for calculating how much new employment floorspace is needed across Greater Manchester is set out within the Employment topic paper.
- Job densities relating to the logistics sector are generally lower than other traditional employment sectors. The sector is an important part of a functioning economy and this site provides a particular opportunity in this regard given its proximity to the tri-modal connections to be delivered to the south of the A57. A diverse economy is considered to be important in respect of the positive contribution it can make to economic inclusion and economic resilience objectives.

### **Green Belt**

- The need to deliver the long-term positive outcomes of the Greater Manchester Strategy is considered to amount to exceptional circumstances which justify altering the boundaries of the Green Belt. The case for exceptional circumstances is explained further in the Green Belt topic paper. Tri-modal facilities at Port Salford will support a more sustainable logistics sector and enabling its expansion will help to significantly boost the competitiveness of Greater Manchester.
- Port Salford and its tri-modal connections have been identified as a strategic opportunity for Greater Manchester and it is therefore appropriate to consider its allocation through the GMSF in order to provide greater certainty around its deliverability.
- An assessment of Green Belt harm resulting from the release of GMSF allocations has been undertaken. It is identified that the release of this allocation would cause 'moderate' harm to Green Belt purposes and 'no/negligible' harm to adjacent Green Belt.
- The allocation would result in the loss of 124ha Green Belt, but there will be a net gain in Salford of 29ha overall as some additions to the Green Belt are also proposed in Salford in the GMSF.
- The allocation will incorporate high levels of landscaping, walking and cycling routes and retain key landscape features (criteria 6 and 11).
- The land between the proposed site allocation and Irlam which is currently designated as Green Belt is proposed to be retained as Green Belt in the GMSF.

### **Brownfield**

- It is noted that there are some opportunities for employment development within places like Trafford Park. However, the Port Salford extension will take advantage of the new port facilities, rail link and highway improvements that will have been completed as part of the early phases of Port Salford. This will provide one of the most well-connected and market-attractive industrial and warehousing locations in the country.

### **Transport – Highways / Public Transport / Cycling / Walking**

- Locality Assessments have been undertaken to confirm the transport impacts of the allocations. These will be published alongside the Publication GMSF.
- The Locality Assessment for this site identifies that significant issues are forecast to be experienced at junction 11 of the M60 and subsequent junctions along the A57. Due to the uncertainty over the delivery of a new junction on the M62 and link road to the A57, this has not been tested. The assessment

therefore presents a worst case scenario that assumes access is provided solely from the A57 Liverpool Road and does not reflect opportunities to secure a mode shift to active travel. This is particularly notable for this allocation where the purpose of the development is to secure a modal shift towards the sustainable movement of goods via water and rail. It is recognised that the assessment does not reflect the likely level of impact. Further work will now be undertaken in consultation with the landowner, TFGM and Highways England to assess the allocation in greater detail taking into account the unique nature of the development. The impact of a new junction on the M62 will be considered as part of this work.

- The GMSF site allocation policy requires that the site delivers the necessary highway improvements of a local and strategic nature (criterion 5), maximises links to existing transport services, and supports new routes and services (including accommodating an extension to the Trafford Park Metrolink line to serve the site - criterion 7).
- The GMSF site allocation policy explains that the development of this site will not be commenced until the rail link, highway improvements, canal berths and container terminal associated with the permitted Port Salford scheme have been completed and are operational (criterion 3).
- Further consideration of the transport implications of the scheme is required beyond the Locality Assessment undertaken to date. This will consider trip generation and modal shares resulting from the development.
- The permitted Port Salford scheme to the south of the A57 will be served by a rail link and canal berths/container terminal providing new opportunities to transport freight by rail and water.
- The tri-modal connections to be provided as part of the permitted Port Salford south of the A57 are central to the proposed extension of Port Salford. It is therefore appropriate to include policy requirements that ensure that this infrastructure is in place and operational prior to the development of the site.
- Comments of support are noted.

#### **Social Infrastructure**

- The allocation will be required to make appropriate contributions to address its impacts in accordance with policy PC1 (Planning obligations) Salford Local Plan: Development Management Policies and Designations (January 2020) once it is adopted.

#### **Environmental – Green Infrastructure, Biodiversity, open space**

##### Biodiversity

- It is not considered that the site presents any significant ecological constraints, subject to appropriate mitigation measures being taken. Where considered relevant, specific issues that need to be addressed have been identified in the GMSF site allocation policy, these include criteria 11, 12, 13, 14 and 15. These matters will be considered in more detail at the masterplanning stage.
- Separate ecological appraisals of the site have been undertaken by the majority landowner and the Greater Manchester Ecology Unit. The city council has also produced a landscape, watercourses and green infrastructure note. These documents will be published alongside the Publication Draft GMSF for information.
- Features such as mature trees and hedgerows will be maintained (criterion 11).

- Detailed ecological surveys would need to be undertaken at the planning application stage to determine mitigation and/or compensation required to address impacts on biodiversity.
- An addition has been made to the GMSF site allocation policy to require that development is supported by a project specific HRA (criterion 15).

#### Biodiversity net gain

- The site will be required to deliver a minimum 10% net gain in biodiversity (criterion 11). This is in line with Environment Bill and is expected to become a national requirement.
- How the development achieves this will be determined at the masterplanning stage.

#### Nature Improvement Area

- The NIA covers a very large area of the sub-region which extends into Warrington and includes areas of existing built development.
- The GMSF site allocation policy requires that the development supports the objectives of the Greater Manchester Wetlands NIA (criterion 12). Determining the measures required to achieve this will be considered in detail at the masterplanning stage as the design and layout of the scheme is worked up.

#### Hydrology

- The development will be required to avoid any adverse impacts on the hydrology of surrounding areas of peat/ mossland (criterion 17). These matters will be assessed and considered in detail at the planning application stage.

#### Agricultural land:

- Agricultural land data suggests that majority of the site comprises grade 1 agricultural land (grades 1 to 3a are defined as the best and most versatile agricultural land). Given the overall scale of development that needs to be accommodated, a limited amount of development on high grade agricultural land is proposed in the GMSF and considered necessary to meet development needs. An agricultural land survey would allow the significance of the loss to be better understood and weighed against the benefits of development.

#### Landscape impact

- The GMSF site allocation policy requires that the development incorporates high levels of landscaping, including the retention or replacement of existing features, so as to minimise the visual impact on the wider landscape (criterion 11). A green infrastructure, landscape and watercourses note for this site will be published alongside the Publication Draft GMSF. Landscape impact will be considered in more detail at the masterplanning stage as the design and layout of the scheme is worked up.

#### Carbon storage

- The GMSF site allocation policy requires development to minimise the loss of the carbon storage function of the peat (criterion 17).
- The majority landowner has undertaken a geotechnical appraisal which includes information on peat depths. This will be published for information alongside the Publication Draft GMSF. Work will need to be undertaken to investigate in broad terms the carbon implications of construction on this site.

#### Recreation

- The allocation will incorporate high levels of landscaping, walking and cycling routes and retain key landscape features (criteria 6 and 11).
- It is understood that the golf course has now closed. The GMSF site allocation policy has been updated to require that the development justifies and provides full compensation for the loss of the golf course in accordance with the National Planning Policy Framework (criterion 10 of the allocation policy).
- Comments of support noted.

#### Air Quality

- The Air Quality Management Area associated with the M62 motorway runs along the site's northern boundary. It is not considered that the site presents any significant air quality constraints, subject to appropriate mitigation measures being taken. These matters will be considered in more detail at the masterplanning stage and an air quality impact assessment will be required when a planning application is submitted. The majority landowner has completed a baseline air quality study which will be published for information alongside the Publication Draft GMSF.
- One of the key attributes of the allocation is its potential to move freight from the roads and move it more sustainably. The GMSF site allocation policy requires that the infrastructure associated with the permitted Port Salford scheme is completed and operational before the expansion is commenced (criterion 3). Criteria 6 and 7 of the GMSF site allocation policy also require that the development is designed to maximise the use of sustainable modes.
- Various policies within Greater Manchester's Transport Strategy 2040 are aimed at improving air quality across the Region. Greater Manchester is also releasing a Clean Air Plan for consultation coinciding alongside release of the GMSF.

#### Flood risk

- The GMSF site allocation policy (criterion 16) requires that the risk of surface water and groundwater flood risk should be mitigated with green Sustainable Drainage Systems as part of the landscaping of the site.
- The development will be required to comply with policy WA6 of the Publication Salford Local Plan: Development Management and Designations (January 2020) once it is adopted. This requires that surface water is managed in a sustainable way and in line with an identified hierarchy.

#### Heritage

- The NPPF requires plan policies to conserve and where appropriate enhance the historic environment. Enhancements of the significance of a heritage asset should only be undertaken where it is appropriate following a thorough understanding of its significance and the impact of any proposals on it. The NPPF also states that any harm to, or loss of, the significance of a designated heritage asset should require clear and convincing justification. The policy has been amended to better reflect the requirements of national policy (criterion 9).

#### Other

- The Masterplan requirement will allow local community to be involved in how the site will be developed. The Revised Draft GMSF required that any masterplan or SPD should be adopted by the city council. This has been amended so that the requirement for a masterplan does not need adopting by the city council, rather it has to be considered acceptable by the city council (see criterion 1).
- Reference to a 'high level' of community engagement remains appropriate and in accordance with paragraphs 39 to 41 of the NPPF. Reference to 'frequent' has been replaced with 'regular'.

- Phasing and construction impacts will be considered through the masterplanning and planning application processes.
- A heritage appraisal has been published which consider issues related to the character of the area.

There have been two formal periods of consultation on the GMSF prior to the Publication Plan (Draft and Revised Draft stages). Consultation has included documents being available on the GMCA website, social media posts, community committee meetings etc. Consultation has been carried out in accordance with the city council's adopted Statement of Community Involvement.

## Further comments on the overall proposals for Salford, including strategic transport interventions (101 comments)

<p><b>Principle / scale of development</b></p> <ul style="list-style-type: none"> <li>• Question the need for the scale of new dwellings with reference to issues including validity of government targets in light of Brexit, immigration control, the use of out of date data (i.e. using 2014 based household projections instead of the 2016 ones), and Salford's requirement being 125% of its local housing need</li> <li>• Salford's housing requirement should be higher to broaden the range and quality of housing in Salford, in particular additional high-quality family housing in the west of the city to balance the high volume of new apartments being constructed in the regional core</li> </ul>
<p><b>Housing (inc affordable housing)</b></p> <ul style="list-style-type: none"> <li>• For consistency with the Salford Local Plan, land at Lumber Lane should be allocated in the GMSF for housing</li> </ul>
<p><b>Employment and Economy</b></p> <ul style="list-style-type: none"> <li>• New housing should be located closer to employment opportunities</li> </ul>
<p><b>Green Belt</b></p> <ul style="list-style-type: none"> <li>• There has only been relatively few changes from the 2016 allocations for Salford</li> <li>• Object to the loss of Green Belt. Issues identified included a lack of exceptional circumstances, loss of a 'green lung' that provides a recreation and wildlife function, and also a buffer from congested roads and motorways</li> <li>• The Greater Manchester Mayor promised to protect Green Belt as part of his manifesto</li> <li>• Proposals to add new land into the Green Belt in Salford are supported; however the Lumber Lane site should also be identified as new Green Belt land</li> <li>• No exceptional circumstances to justify the inclusion of land west of Burgess Farm and land at Lumber Lane into the Green Belt</li> <li>• Need to release additional Green Belt land for development, as follows: <ul style="list-style-type: none"> <li>○ Broadoak</li> <li>○ Crossfield Drive</li> <li>○ Beesley Green</li> <li>○ Linnyslaw</li> <li>○ Wardley</li> <li>○ Walkden Road</li> <li>○ School Lane, Irlam</li> </ul> </li> <li>• Land to the north of Leigh Road should be removed from the Green Belt and identified as safeguarded land</li> </ul>
<p><b>Brownfield</b></p> <ul style="list-style-type: none"> <li>• Focus should instead be on available brownfield sites; these sites mean that the release of Green Belt is not necessary in Salford.</li> <li>• Need to take account of new brownfield sites that will emerge during the plan period, including within town centres.</li> </ul>
<p><b>Transport – Highways / Public Transport / Cycling / Walking</b></p> <ul style="list-style-type: none"> <li>• New housing should be located closer to areas where major transport investments are planned.</li> <li>• The proposals in Salford will increase traffic congestion which is already at chronic levels; given this transport improvements should be in place before building starts.</li> <li>• Transport improvements have not been identified for the Swinton, Boothstown, Ellenbrook, Worsley Walkden and Little Hulton areas.</li> <li>• Problems identified on the motorways, particularly the M60 (junctions 13-16).</li> </ul>

<ul style="list-style-type: none"> <li>• Suggested proposal for a link from the A57 over the Ship Canal in Irlam to the new Manchester Airport bypass.</li> <li>• Cumulative impacts of other developments in Bolton and Wigan; commuting from these places into Manchester is through Salford.</li> <li>• Need for further development of Metrolink in Salford.</li> <li>• The Vantage bus services are already full by the time they reach Salford.</li> <li>• Tram/train proposals should be in addition to existing rail services and not replace them, given that tram/trains will be slower, more expensive and have poorer connections.</li> <li>• Need to increase the levels of people walking and cycling, instead of using the car</li> </ul>
<p><b>Physical Infrastructure and utilities</b></p>
<ul style="list-style-type: none"> <li>• Whole utilities infrastructure in Salford needs investment and improvement, in particular there are issues with corroding gas pipes, the sewerage system, low water pressure and drops in electricity supply</li> </ul>
<p><b>Social Infrastructure</b></p>
<ul style="list-style-type: none"> <li>• Concerns relating to the existing capacity of community infrastructure (including schools, doctors, dentists, emergency services, shops and services for younger people) and the potential to support new homes.</li> <li>• Social infrastructure should be in place before building starts.</li> </ul>
<p><b>Environmental – Green Infrastructure, Biodiversity, open space</b></p>
<ul style="list-style-type: none"> <li>• Building new developments is drastically reducing habitats for wildlife.</li> <li>• Concerns regarding loss of green space / recreation opportunities due to development, and the impact this has on health and well-being.</li> <li>• Development of the mosslands is wholly unsustainable.</li> </ul>
<p><b>Air Quality</b></p>
<ul style="list-style-type: none"> <li>• Development will lead to the exacerbation of existing issues of poor air quality including through traffic; Salford already has one of highest levels of deprivation in the country and life expectancy and health are below national averages.</li> </ul>
<p><b>Other</b></p>
<ul style="list-style-type: none"> <li>• Criticism of consultation process undertaken and of the format and structure of the Revised Draft GMSF.</li> </ul>
<p><b>Response to Comments</b></p>
<p><b>Principle / scale of development</b></p> <ul style="list-style-type: none"> <li>• The Greater Manchester housing requirement is calculated using the government's standard local housing need methodology set out in national planning practice guidance. This requires the use of the 2014 based-household projections.</li> <li>• There has been redistribution of some of the local housing need that arises in the rest of Greater Manchester to Salford reflecting significant opportunities within the centre of the conurbation (and the market for high density apartments). The Housing Topic Paper explains further how the housing requirements have been calculated.</li> <li>• Issues of dwelling type are being considered across GM as a whole through the GMSF process given that GM is seen as being a single housing market. The mix across Greater Manchester and the individual districts is considered to be appropriate.</li> </ul>
<p><b>Housing (inc affordable housing)</b></p> <ul style="list-style-type: none"> <li>• The GMSF allocates strategic sites that are currently in the Green Belt for development. Lumber Lane is not in the Green Belt and so is not within the scope of the GMSF for allocation. Note that the Lumber Lane site was not allocated in the 2020 version of the local plan, given that this plan no longer allocates land for development.</li> </ul>



### **Employment and Economy**

- The suggestion that housing and employment opportunities should be located close to each other is noted. The GMSF seeks to create mixed and sustainable communities which reduces the need to travel, including ensuring that there are jobs within easy reach of housing areas.

### **Green Belt**

- The need to deliver the long-term positive outcomes of the Greater Manchester Strategy is considered to amount to exceptional circumstances which justify altering the boundaries of the Green Belt. The case for exceptional circumstances is explained further in the Green Belt topic paper.
- Support for the addition of land into the Green Belt is noted.
- Lumber Lane does not meet Green Belt purposes and so therefore has not been included as an addition to the Green Belt.
- Exceptional circumstances for the Green Belt additions are set out within the Green Belt topic paper.
- Additional Green Belt release in Salford for new housing is not considered to be appropriate, particularly when regard is had to the site selection process.
- Land to the north of Leigh Road has been retained as Green Belt. It is not considered that there are any compelling reasons for why the land should be removed from the Green Belt and safeguarded.

### **Brownfield**

- The GMSF sets out a brownfield preference approach.
- The supply of dwellings on brownfield land and vacant buildings has been maximised as set out in the Housing and Employment Topic Papers. However, there is a quantitative and qualitative shortfall in the supply which can only be met through the release of Green Belt.
- Account has been taken of brownfield sites that will emerge over the plan period where there is current evidence that this will happen.

### **Transport – Highways / Public Transport / Cycling / Walking**

- Locality Assessments have been undertaken to confirm the transport impacts of the allocations. These will be published alongside the Publication GMSF.
- Strategic modelling work has also been undertaken which looks at the cumulative impacts of the existing land supply (i.e. development on non-Green Belt land between 2020-37) and from the allocations.
- The Greater Manchester Transport Strategy 2040 sets out the long-term vision for how the transport system needs to change across Greater Manchester and the key priorities for achieving this.
- The Transport Strategy 2040 Draft Delivery Plan sets out improvements to transport across Greater Manchester.
- The detailed transport evidence base that has been produced in support of the GMSF proposals has been published.
- The potential to expand and improve rapid transit services is being explored by TfGM.
- Policy GM-N1 of the GMSF sets out that in order to help deliver an accessible, low carbon Greater Manchester with world-class connectivity, Greater Manchester's authorities will support a range of measures, including locating and designing development, to deliver a significant increase in the proportion of trips that can be made by walking, cycling and public transport.

### **Physical Infrastructure and utilities**

- Discussions have been held with Utilities companies with regards to the provision of utilities infrastructure.

### **Social infrastructure**

- Development will be required to make appropriate contributions to address its impacts in accordance with policy PC1 (Planning obligations) Salford Local Plan: Development Management Policies and Designations (January 2020) once it is adopted.
- Phasing of social infrastructure will be considered at the planning application stage.

### **Environmental – Green Infrastructure, Biodiversity, open space**

- Across the plan as a whole a net enhancement of biodiversity resources will be sought (policy GM-G 9). This includes increasing the quality, quantity, extent and diversity of habitats and achieve a net gain in biodiversity.
- Objective 8 of the GMSF is to improve the quality of natural environment and access to green spaces through: enhancing the special landscapes across Greater Manchester, green infrastructure, biodiversity and geodiversity; and improving access to the natural environment and green spaces including parks and playgrounds.
- As noted within the introduction to policy GM-G 4, the importance of the habitats and wider landscape means that there is a strong emphasis in the GMSF on the retention and improvement of the mosslands, and the majority of these areas will see little or no development. However, some sections of undeveloped mossland, are considered appropriate for future development as they are well-located to make a notable contribution to delivering more balanced and inclusive growth (such as the North of Irlam housing allocation which is in very close proximity to Irlam Train Station).

### **Air Quality**

- GMSF policy GM-S-6 is concerned with Clean Air. This sets out a comprehensive range of measures to support improvements in air quality, focusing particularly on locations where people live, where children learn and play, where there are impacts on the green infrastructure network and where air quality targets are not being met.
- Various policies within Greater Manchester's Transport Strategy 2040 are aimed at improving air quality across the Region. Greater Manchester is also releasing a Clean Air Plan for consultation coinciding alongside release of the GMSF.

### **Other**

- There have been two formal periods of consultation on the GMSF prior to the Publication Plan (Draft and Revised Draft stages). Consultation has included documents being available on the GMCA website, social media posts, community committee meetings etc. Consultation has been carried out in accordance with the city council's adopted Statement of Community Involvement.

### 3.2.9. Strategic Allocations in Stockport

There are 8 allocations in Stockport. There were 3,898 comments received in relation to the Stockport allocations.

#### **GM Allocation 34: Bredbury Park Extension** (627 comments)

A significant proportion of comments related to the transport impact of the proposed development, most notably that the low railway bridge on Ashton Road constrains access to/from M60 junction 25 and that high vehicles consequently have to access the site via Denton. Concerns were also raised regarding the adequacy of existing and proposed transport measures, especially walking, cycling and public transport measures.

Many consultees raised the loss of recreation value, not just the loss of footpaths running across the site but also in terms of amenity impact on adjacent areas, particularly adjacent to and on the opposite side of the River Tame. The amenity and visual impact upon the landscape and topography were also raised as were the visual and noise impacts upon the adjacent Castle Hill Residential Park.

Concerns were raised over the ecological impact of the proposal, in particular the loss of wildlife habitat and green infrastructure. Many consultees raised, albeit incorrectly, that the proposed allocation is a nature reserve; there is, however, a local nature reserve on the opposite side of the River Tame and many consultees raised concerns over the potential for that to be negatively impacted upon. A large number of consultees raised concerns regarding the potential for increased noise, air and light pollution, as well as concerns about the potential for pollution to pass into the river.

In more general terms concerns were raised that the proposal ran counter to the brownfield priority set out in the revised draft GMSF, that the proposal would result in a loss of Green Belt (and consequently loss of the protections that Green Belt provides) and that there are inadequate infrastructure and services available to support the development. A number of consultees also set out that there is no need for employment development, noting that there are numerous vacant units available on the existing Bredbury Park industrial estate, asking whether there are more suitable locations within Stockport and raising concerns that large warehouse developments will not result in many jobs being created.

<b>Housing (inc affordable housing)</b>
<ul style="list-style-type: none"> <li>• There was some support for the proposal but there was question as to whether there was scope for housing on the site.</li> </ul>
<b>Employment and Economy</b>
<ul style="list-style-type: none"> <li>• It was highlighted that there are empty units locally elsewhere (up to 15/20% of nearby employment area) and that there is too much employment land in Greater Manchester already.</li> <li>• The employment potential of warehouses is low and it was felt that there are more suitable areas in Stockport for such development.</li> <li>• Forecasts for development levels are out of date and it was questioned as to how it can be assured that local people benefit from the job opportunities</li> <li>• There was some support for the proposal in that it will provide more work for local people and allows Stockport to host industrial and warehousing activities</li> </ul>
<b>Green Belt</b>
<ul style="list-style-type: none"> <li>• There were a large number of comments regarding the loss of Green Belt and in particular that it prevents the joining of Bredbury and Denton</li> </ul>
<b>Brownfield</b>

<ul style="list-style-type: none"> <li>• The development contradicts the brownfield first approach put forward in the GMSF</li> <li>• There were many comments putting forward the re-use of existing land and buildings rather than creating new development on greenfield land</li> </ul>
<p><b>Transport – Highways / Public Transport / Cycling / Walking</b></p>
<ul style="list-style-type: none"> <li>• Existing congestion on surrounding main roads and in surrounding areas will lead to increased delays as well as an impact on Junction wr of the M60 which is already deemed as dangerous</li> <li>• Multiple comments about the low bridge on Ashton road, including the need for HGVs to travel via Denton</li> <li>• There were comments about the need for a bypass (A6/M60) but this allocation was seem either as a further need to build it or an excuse to get it justified</li> <li>• Public transport network does not have sufficient capacity to support this development and this includes.no Metrolink or train link</li> <li>• Development should seek to utilise nearby rail line</li> <li>• Impact on public footpaths,as they are currently not seen as being wide enough, and the loss of cycling and horse riding routes</li> <li>• Developers will not pay to make provision for access to the site</li> </ul>
<p><b>Social Infrastructure</b></p>
<ul style="list-style-type: none"> <li>• School places and other local services are already stretched and the scale of this development could make things worse</li> </ul>
<p><b>Environmental – Green Infrastructure, Biodiversity, open space</b></p>
<ul style="list-style-type: none"> <li>• There is a lack of open space in the area already and the development would go against GM-G1 (Valuing Important Landscapes),GM-S 13 ‘Protecting river valleys, trees and woodland’; GM-G2 ‘Green Infrastructure’, GM-G6 ‘Urban Green Spaces’, GM-G9 ‘Providing access to natural green spaces; and GM-G11 ‘Safeguarding the countryside from encroachment’</li> <li>• The area is used extensively for walking and horse riding, there are various species listed as being present on site as the site is part of a nature reserve and there is deciduous woodland on site which is a priority habitat</li> <li>• There is a risk that the River Tame being polluted and there will be an impact on the while river valley with no bio-diversity net gain</li> </ul>
<p><b>Air Quality</b></p>
<ul style="list-style-type: none"> <li>• The development fails to comply with the GM-S6 (Clean Air) and Clean Air Plan</li> <li>• Pollution levels are already too high even before this development and levels would be Impacted on in terms of noise and dust during the development</li> <li>• Will reduce life expectancy in Haughton Green</li> </ul>
<p><b>Flood risk</b></p>
<ul style="list-style-type: none"> <li>• The development would remove soakaway from area and cause damage the water table</li> <li>• There is a need for sustainable drainage systems including tree planting</li> </ul>
<p><b>Other</b></p>
<ul style="list-style-type: none"> <li>• There will be an increase in noise, light and traffic pollution and this will all have an impact on mental health</li> <li>• The development will blight the local area, including Castle Hill estate and in particular the poorer areas will be affected whilst the more affluent areas will not</li> <li>• Further negatives are seen as being the attraction of anti-social behaviour, the effect on value of homes and the loss of views</li> <li>• Woodley and Bredbury already have an unfair share of similar sites</li> <li>• Plan should be for a shorter timeframe</li> </ul>

### **Response to comments**

The proposal has been reduced in scale to 60,000 sq m of B2/B8 floorspace with over 10 hectares of the allocation now proposed to be retained within the Green Belt as a buffer zone that helps to minimise the impact on the Tame Valley and safeguard views creating strong defensible boundaries at the edge of the developable area.

The policy wording has been revised to be clearer that a package of mitigatory transport interventions will be required for the development to proceed. The Locality Assessment prepared for the site shows that with such measures it is possible to mitigate its likely transport impact to within a less than severe level.

The policy is worded so as to require development to be designed so as to minimise any adverse impacts on adjacent remaining Green Belt, including through use of suitable landscaping and buffer zones. The policy also requires development to contribute to the area's special landscape characteristics and restore positive landscape features.

The policy includes a requirement for development to protect and enhance biodiversity interests and secure opportunities to achieve biodiversity net gains (in line with the relevant strategic GMSF policy). It should be noted that the proposal is not within the local nature reserve which is actually sited on the opposite side of the River Tame. The National Planning Policy Framework and other Local Plan policies seek to ensure that development does not have unacceptable impacts with regards to noise, air, light or water pollution.

The GMSF sets out an approach which seeks to ensure that opportunities to identify and development brownfield land are as exploited as fully as possible. Evidence on the supply of land which is both available and suitable for industrial and warehousing development shows that this is inadequate to meet Greater Manchester's, and Stockport's, needs during the period of the GMSF; it is therefore necessary to consider removal of land from the Green Belt to ensure that those needs can be met.

Wording has been added to the policy to require that development secures training and employment opportunities for local people.

Other concerns raised by consultees are covered by the policy or are covered by other policies within GMSF or other parts of the Local Plan. Some concerns are not within the scope of matters that can be address by a development plan or have been shown by evidence to not be an issue at this proposed allocation.

### **GM Allocation 35: Former Offerton High School (273 comments)**

A significant portion of comments related to the capacity of local infrastructure, particular in terms of education, health and transport.. A number of comments mentioned the closure of Offerton High school and its lack of replacement.

Concerns were raised over the possible closure of the sports hall, congestion and road safety particularly along Curzon Road as well as the lack of public transport options, since there is no train station or Metrolink in the area and limited. bus routes It was suggested that a better choice of bus routes should be provided for example linking in with Stepping Hill Hospital and shops along Dialstone Lane.

There was a lot of uncertainty over how affordable the houses would be and the term 'affordable' was described as being very vague.and concerns were raised over the Offerton Wood Ancient & Semi-Natural Woodland and the impact on Poise Valley Nature Reserve The area is designated as a principal aquifer meaning that it is capable of supporting water supplies and river base flow on a strategic scale and also lies within a groundwater source protection zone.

There were some positive comments as the development is on a brownfield site and bringing in regeneration to the area.

<b>Principle / scale of development</b>
<ul style="list-style-type: none"> <li>It was felt that the area was being over development with too many houses leading to overcrowding</li> </ul>
<b>Housing (inc affordable housing)</b>
<ul style="list-style-type: none"> <li>There was concern over house value depreciation with any affordable housing being of detrimental to existing home owners</li> <li>It was recognised that there was a need for more affordable housing but just not in this location</li> <li>Affordable housing is a vague term and there needs to be more certainty as to what this actually means for first time buyers in particular</li> <li>It was felt that the wrong ONS figures used for housing amount predictions.</li> </ul>
<b>Employment and Economy</b>
<ul style="list-style-type: none"> <li>There are not enough employment opportunities in the area generally</li> </ul>
<b>Green Belt</b>
<ul style="list-style-type: none"> <li>The new Green Belt areas are argued to be too small and include golf courses which have no biodiversity and there was objection to any Green Belt loss as this development does not represent exceptional circumstance</li> </ul>
<b>Brownfield</b>
<ul style="list-style-type: none"> <li>It was agreed that it should be brownfield first and it was highlighted that it was good to see the use of existing buildings being re-developed and in particular there should be a focus on Town Centres</li> </ul>
<b>Transport – Highways / Public Transport / Cycling / Walking</b>
<ul style="list-style-type: none"> <li>There is no Metrolink, train or enough bus routes to make this site sustainable</li> <li>The link road from High Lane to Bredbury linking the new A6 Marr SEMMMs route would be the answer to releasing the traffic chaos</li> <li>There was concern with site access with only one road in and out of the development</li> <li>There is already congestion and there is already a school traffic safety issues at present</li> <li>Cumulative impact with Hempshaw lane development</li> </ul>

<ul style="list-style-type: none"> <li>• It was argued that the scale of the allocation is unlikely to give rise to traffic impacts at the Strategic Road Network (SRN) on either an individual or cumulative level but there was concern over future congestion and road safety along Curzon road,</li> <li>• It was suggested that a better choice of bus routes should be provided for example linking in with Stepping Hill Hospital and shops along Dialstone Lane.</li> </ul>
<p><b>Physical Infrastructure and utilities</b></p> <ul style="list-style-type: none"> <li>• The existing infrastructure cannot cope with demand at present even before any further development</li> <li>• This area is underlain by bedrock of the Collyhurst Sandstone Formation which is overlain by superficial drift deposits comprising glacial till. The Collyhurst Sandstone is designated as a principal aquifer meaning that it is capable of supporting water supplies and river base flow on a strategic scale.</li> <li>• The area also lies within a groundwater source protection zone 3 for a nearby potable water supply abstraction.</li> </ul>
<p><b>Social Infrastructure</b></p> <ul style="list-style-type: none"> <li>• There were many comments about schools and education provision particularly in light of the closure of Offerton High School. It was highlighted that here is a covenant on this land stipulating its use for educational purposes</li> <li>• It was felt there was a general lack of necessary infrastructure particularly in relation to health with pressure on Stepping Hill Hospital and GPs and journeys to hospital and ambulance times made longer due to congestion</li> <li>• Concerns over loss of leisure facility and a desire for the site to be a communal space. The site could easily be adapted for new sports facilities which could be used by the primary/secondary school and other local schools who don't have suitable sports access There is a need to ensure there are appropriate facilities for children particular teenagers and open space should be provided within the development</li> </ul>
<p><b>Environmental – Green Infrastructure, Biodiversity, open space</b></p> <ul style="list-style-type: none"> <li>• The development would lead to the loss of biodiversity, Goyt Valley greenery and ancient woodland with the Offerton Wood an Ancient &amp; Semi-Natural Woodland being located north of the site boundary and there are two badger setts close to the site.</li> <li>• The River Goyt would have a reduced use as an ecological corridor because of the development and there would be an impact on the Poise Valley Nature Reserve</li> <li>• Any loss of this Landscape Character Area would increase greenhouse gases /CO2 and create a further lack of green space</li> </ul>
<p><b>Air Quality</b></p> <ul style="list-style-type: none"> <li>• There was concern that there will be an increase in air pollution as a result of the development</li> </ul>
<p><b>Flood risk</b></p> <ul style="list-style-type: none"> <li>• The area is underlain by bedrock of the Collyhurst Sandstone Formation which is overlain by superficial drift deposits comprising glacial till. The Collyhurst Sandstone is designated as a principal aquifer meaning that it is capable of supporting water supplies and river base flow on a strategic scale. The area also lies within a groundwater source protection zone and the wording of the policy should reflect this.</li> <li>• Generally it was felt that there is potential for the development to increase the risk of flooding</li> </ul>
<p><b>Other</b></p> <ul style="list-style-type: none"> <li>• There has been previous miscommunication over the use of the site</li> <li>• Plan period should be shorter</li> <li>• An alternative site was suggested at Offerton Fire station.</li> </ul>

### **Response to comments**

The policy wording has been revised to be clearer that a package of mitigatory transport interventions will be required for the development to proceed. The Locality Assessment prepared for the site shows that with such measures it is possible to mitigate its likely transport impact to within a less than severe level.

The policy includes a requirement that the development contributes towards the provision of additional school places and health provision to meet the additional needs it places upon such infrastructure.

The policy sets out a requirement that the development makes an appropriate contribution towards the provision of new community facilities in the Offerton area. The explanatory text which sits alongside the policy sets out that the site forms part of a wider regeneration strategy in which it will be brought forward in conjunction with land at Blackstone Road Open Space as part of an ongoing regeneration strategy for the Offerton area. The Blackstone Road site is intended to deliver around an additional 65 dwellings, a new leisure centre to address local need and community facilities including, but not necessarily limited to, a library and health facilities.

The policy is clear that development will be required to make provision of a minimum of 20% affordable housing on site, providing a range of housing types, including older persons' affordable accommodation. Affordable housing is defined by other policies in the Local Plan, based on evidence of both need and viability with particular reference to those in housing need and the most recent Housing Needs Assessment

Whilst any areas of biodiversity value are outside of the allocation, the policy includes a direct requirement that development protects and enhances biodiversity interests, including through implementing the strategic requirement from elsewhere within the GMSF to bring about an overall biodiversity net gain.

Other concerns raised by consultees are covered by the policy or are covered by other policies within GMSF or other parts of the Local Plan. Some concerns are not within the scope of matters that can be address by a development plan or have been shown by evidence to not be an issue at this proposed allocation.



**GM Allocation 36: Gravel Bank Road / Unity Mill (450 comments)**

A significant proportion of comments related to the transport and air quality impact of the proposed development, most notably along the Gravel Bank Road and Hyde Road. Cumulative impacts in terms of traffic were raised with regards to the Bredbury extension.

Rail provision was raised as an issue in terms of lack of carriages and parking, it was suggested that walking and cycling links need to be improved to the station.

Many concerns were raised over the Heritage impacts of the mill and Conservation area, as well as the impact on the remaining Green belt and wildlife.

Flood risk was raised multiple times with the comments referring to the water table being high and the site having a high clay content.

In general terms many comments raised concerns that there are inadequate infrastructure and services available to support the development, but there was support of the rejuvenation of the mill.

<b>Principle / scale of development</b>
<ul style="list-style-type: none"> <li>• There is a cumulative impact of this development with Bredbury Industrial estate</li> <li>• Some support for this development with the element of regeneration that is included. More supportive on this allocation than the others</li> </ul>
<b>Housing (inc affordable housing)</b>
<ul style="list-style-type: none"> <li>• It was felt that this is not the correct location for elderly accommodation due to the topography of the local area and the distance to public transport</li> <li>• There was support for the building of new affordable homes but would like to see this all directed to first time buyers rather than towards luxury houses.</li> <li>• As a direct result of this development it was felt that there would be a decrease in existing house prices</li> <li>• Statistics around housing are out of date, latest ONS figures should be used</li> <li>• The inaccuracy of the official statistics used and the fact they do not accurately reflect Brexit should be taken into account</li> <li>• There was a suggestion that this development should be increased to 300 homes</li> </ul>
<b>Green Belt</b>
<ul style="list-style-type: none"> <li>• The loss of Green Belt was the primary concern being urban sprawl with settlements in Tameside merging with Stockport as has been the case already with Bredbury and Woodley</li> <li>• It was felt that this development is not enough of an exceptional circumstance to warrant the development in Green belt and there was a suggestion for more green belt to be released to the south of the mill</li> </ul>
<b>Brownfield</b>
<ul style="list-style-type: none"> <li>• Housing and economic needs should be more realistically calculated and when all brownfield sites are found and used, and/or a shorter plan period is used, there should be no need to build on any green and</li> </ul>
<b>Transport – Highways / Public Transport / Cycling / Walking</b>
<ul style="list-style-type: none"> <li>• There is a public right of way running through the adjoining field and this would need to be kept. It is used by walkers to gain access to the canal paths and the river valley.</li> </ul>
<b>Environmental – Green Infrastructure, Biodiversity, open space</b>
<ul style="list-style-type: none"> <li>• The area offers a canal with a habitat for wildlife, views of the countryside and the site is located within the Tame Valley and Brinnington East Landscape Character Area,</li> </ul>

<p>creating a strong north-south rural gateway into Stockport Town Centre, and this ought to be protected and enhanced in the future. Haughton Dale and Hulme Woods access would also be affected</p> <ul style="list-style-type: none"> <li>• Any development would increase noise and light pollution and reduce the amount of available agricultural land</li> <li>• It was also mentioned that is a historic landfill on the site</li> <li>• Development should incorporate street trees to act as traffic calming</li> </ul>
<p><b>Physical Infrastructure and utilities</b></p>
<ul style="list-style-type: none"> <li>• There was concern over the capacity of utility services and in particular sewerage as the mill carries sewer pipes</li> <li>• It was highlighted that there was previous coal mining activity in the area of the development , so subsidence could therefore be an issue</li> </ul>
<p><b>Social Infrastructure</b></p>
<ul style="list-style-type: none"> <li>• It was felt that there is already a lack of schools, dentists and doctors in the area and that there would be further pressure particularly on Stepping Hill hospital and a general impact on Emergency Services</li> <li>• Amenities</li> <li>• Improvements needed to shopping area</li> <li>• The small community hall now requires demolition and a better, safer and creatively designed building be constructed in its place. There also needs to be improvements to the shopping area and to all amenities generally</li> <li>• Work will need to be done to fully support the walking and cycling opportunities of the site including the connection to the canal</li> <li>• Recognition should be made to the small playing field used by local children adjacent to Gravel Bank Rd.</li> </ul>
<p><b>Cumulative impacts</b></p>
<ul style="list-style-type: none"> <li>• It was highlighted that there have already been three large new build developments within a mile of each other along a stretch of the A560 at Gravel Bank Road in the past year with no enhanced or extra infrastructure/facilities provided.</li> <li>• A number of comments also mentioned the impact of the Tameside development at Apethorn Lane and Bowlacre on A560 and the cumulative impact with the Bredbury extension and 50 homes on farm land next to A560 and Apethorn Lane</li> </ul>
<p><b>Air Quality</b></p>
<ul style="list-style-type: none"> <li>• Air quality is already very poor along the A560 and in particular already around primary schools</li> <li>• Not in accordance with the Key Performance Indicators's of the Greater Manchester Air Quality Action Plan 2016-2021</li> </ul>
<p><b>Flood risk</b></p>
<ul style="list-style-type: none"> <li>• The site has a high water table with the under soil being mostly clay which is not free draining and so the field is frequently water logged and there are also sink holes on site</li> <li>• Street trees should be provided for drainage solution</li> <li>• The A560 at the junction with Apethorn Lane/Stockport Road frequently floods after brief periods of heavy rain as does the hollow just beyond the Joshua Bradley restaurant..</li> </ul>
<p><b>Heritage</b></p>
<ul style="list-style-type: none"> <li>• The look and the character of the building and the surrounding area must be maintained and not overly developed.</li> <li>• The mill is part of the Peak Forest Canal and Conservation Area and is a listed building and should therefore be preserved</li> </ul>

<b>Other</b>
<ul style="list-style-type: none"><li>• There was concern about the potential for increased crime as a direct result of the development</li><li>• Some felt that there was not enough publicity about the proposals</li><li>• There was a danger that communities could become isolated with there only being one way in and out of the development giving rise to social issues and inequalities</li></ul>
<b>Response to comments</b>
<i>This allocation is no longer included in GMSF.</i>

**GM Allocation 37: Heald Green (458 comments)**

Concerns were raised that the proposal would lead to a disproportionate loss of Green Belt in this part of Stockport and resultant increase in urban sprawl and loss of valuable wild life habitats.

Many comments raised concerns over traffic congestion particularly in relation to Outward Road/Bolshaw Road and air quality particular with regards other developments already being built in the area.

There were also concerns that there are inadequate infrastructure and services available to support the develop The potential removal of the playing field off Outwood road has been raised as a concern.

<b>Principle / scale of development</b>
<ul style="list-style-type: none"> <li>There is a disproportionate amount of Green Belt loss which will lead to the loss of the identity of Heald Green as it will no longer be a village</li> </ul>
<b>Housing (inc affordable housing)</b>
<ul style="list-style-type: none"> <li>It was felt that houses should be prioritised for first time buyers and young families and that there is a need for more social housing. In particular the question was raised as to why there was only 30% affordable housing proposed when the Stockport MBC policy is for 50% for affordable housing</li> <li>A number of respondees highlighted that they felt that the housing density was too high and that it would be difficult to deliver affordable housing in Heald Green, as it is a wealthy area</li> </ul>
<b>Employment and Economy</b>
<ul style="list-style-type: none"> <li>It was highlighted that there is a baseline economic forecast and an accelerated growth economic forecast but no forecasts for neutral or negative growth so it does not take into account the potential uncertainty around Brexit. The growth figures need to be realistic as possible</li> </ul>
<b>Green Belt</b>
<ul style="list-style-type: none"> <li>The loss of Green Belt as result of this development reduces Heald Green's Green Belt by 50% which will cause the merger of development sites in Cheshire East and Greater Manchester, thereby losing its purpose. The development does not meet exceptional circumstance and the exceptional circumstance are not made clear in the strategy</li> <li>Loss of Green Belt will be detrimental to social, physical and psychological well-being of residents</li> <li>'Aiming for a shorter plan period such that there is a sufficient supply of land without using Green Belt.</li> <li>Bruntwood Park's designation as Green Belt would not give it any further protection and it does not fulfil the purposes or criteria of Green Belt designation</li> </ul>
<b>Brownfield</b>
<ul style="list-style-type: none"> <li>It was felt that the use of brownfield land has not been explored enough and things such as airport aar parks should be developed for housing instead</li> <li>Cheadle Royal should be developed</li> <li>Reuse the empty housing and empty warehouses in GM</li> </ul>
<b>Transport – Highways / Public Transport / Cycling / Walking</b>
<ul style="list-style-type: none"> <li>There were many comments about congestion and in particular Outward Road/Bolshaw Road (A34)</li> <li>It was generally felt that the A555 improved congestion in Heald Green and that this development would reverse the impact</li> </ul>

- There needs to be cross boundary working with regards to public transport with Cheshire East
- Train service and bus services are poor with some bus services in the area already being cut. It was highlighted that this particularly affects the elderly
- There needs to be a huge increase in parking at the station to meet the aim of increased use as a result of this development
- The new railway station at Stanley Green would be welcome but could be better used if some or all of the houses proposed in the first draft of GMSF for the East of the A34 (Cheadle Hulme) were added back in and taken out of the Heald Green allocation
- There was criticism that there is a lack of joined up planning between the draft GMSF and the Transport for Greater Manchester’s strategy for 2040
- The cumulative impact from traffic from Handforth and other Cheshire East developments should also be taken into account

**Airport**

- Congestion and parking in the area is already bad because of the Airport. People park on local roads for access to the airport which adds to the traffic and parking problems on side roads
- A further consideration is the Vortex damage to house roofs from over-flying planes. There have been a considerable number of incidents where houses have been damaged by vortices, caused by planes flying overhead. The effect is often that tiles or slates are sucked off roofs and can then cause injury as they fall to the ground.
- There is already too much urban housing around Manchester Airport for safety in emergencies of landing/taking off aircraft
- The cumulative impact of the Airport city expansion also needs to be considered

**Physical Infrastructure and utilities**

- The recent National Audit Commission Report ‘Planning for new homes’ stated clearly that the majority of private developers do not fulfil agreements they made to provide necessary infrastructure to service the homes they build, and neither do they fulfil their agreed quota of ‘affordable’ homes. Existing utilities will not be able to cope

**Social Infrastructure**

- There were many concerns raised over the closure of Bolshow school and that any further development meant that health and educational facilities would not be able to cope and emergency services will be hampered by the new development
- The lack of communal areas will mean that there will be no areas for children to play and there will be no place to hold meetings or to host the Heald Green Festival

**Environmental – Green Infrastructure, Biodiversity, open space**

- There is a covenant attached to the football pitch land, prohibiting its use for development and the pitches are currently used by Cheadle and Gatley FC
- The area is vital breeding area for a variety of birds and the development will not protect and enhance biodiversity and lead to a loss of habitat for wildlife
- The development represents are “cutting off” of what is already a very narrow wildlife corridor, causing fragmentation of Stockport’s wildlife sites.
- Development requirement should include the provision of new woodlands and woodland buffers
- There will be negative impacts on the Heald Green Landscape Character Area and on the visual amenity value to and from the Peak District National Park and the countryside of Cheshire East
- There will also be a clear detrimental effect on farming land and in particular a loss of a long standing tomato and plant growing business

**Air Quality**

- Due to the airport in direct proximity to the area. Air quality is already poor. The impact of more development and loss of green space will have a detrimental impact on health

<p><b>Flood risk</b></p> <ul style="list-style-type: none"> <li>• There is poor draining in the area of this allocation as the land is broadly flat with no significant drainage. The top surface is glacial clay in excess of one metre deep. As a result the drainage is very poor, with a high water table. During the winter, seasonal springs can occur on the fields proposed for development</li> <li>• Street trees should be included as part of wider drainage measures</li> <li>• The area is known for poor surface-water drainage, being built on previous farmland linked by significant numbers of farm ponds</li> <li>• Cross Road, which boundaries the proposed site, has suffered on a number of occasions in recent years from subsidence and 'sink-hole' collapse particularly adjacent to Bolshaw Primary School.</li> <li>• If it rains heavily water comes down Outwood Road like a fast-moving stream</li> </ul>
<p><b>Other</b></p> <ul style="list-style-type: none"> <li>• The plan is inaccurate because it shows commercial buildings where there is farmland</li> <li>• There is no analysis of the sites that were discounted, there should be a comparative analysis.</li> <li>• The consultation itself was unhelpful</li> <li>• Gatley Golf Course and the old garden centre on Ladybridge Road opposite the five arches bridge in Cheadle Hulme should be taken into consideration as a housing site</li> </ul>
<p><b>Response to comments</b></p> <p>The distribution of the allocations proposed by the GMSF is established based on a clear site-selection methodology which demonstrates the proposed allocations to be the most sustainable to meet the identified gap in land which is required to meet future development needs. The impact of the proposals on the Green Belt has been assessed through a suite of evidence studies. The policy is worded so as to require development to be designed so as to minimise any adverse impacts on adjacent remaining Green Belt, including through use of suitable landscaping and buffer zones.</p> <p>The policy requires that development protects and enhances biodiversity interests, including through implementing the strategic requirement from elsewhere within the GMSF to bring about an overall biodiversity net gain. Illustrative masterplanning undertaken to demonstrate the deliverability of the policy shows that it is possible to deliver the quantum of development proposed within the constraints of known biodiversity interests.</p> <p>The policy wording has been revised to be clearer that a package of mitigatory transport interventions will be required for the development to proceed. The Locality Assessment prepared for the site shows that with such measures it is possible to mitigate its likely transport impact to within a less than severe level. The site is exceptionally well located to take advantage of existing and proposed public transport infrastructure.</p> <p>The policy includes a requirement that the development contributes towards infrastructure including additional school places and health provision to meet the additional needs it places upon such infrastructure.</p> <p>The policy includes an explicit requirement to provide new and enhanced playing pitches, with suitable changing room facilities and parking, to replace those lost to development as well as a more general requirement to make provision for Make provision for suitable and publicly accessible open space and green infrastructure within the site.</p> <p>Other concerns raised by consultees are covered by the policy or are covered by other policies within GMSF or other parts of the Local Plan. Some concerns are not within the</p>

scope of matters that can be address by a development plan or have been shown by evidence to not be an issue at this proposed allocation.

**GM Allocation 38: High Lane** (897 comments)

A significant proportion of comments related to the transport impact of the proposed development, most notably along the A6. Many comments were raised around the extra traffic on the A6 caused by the recent construction of the A6 to Manchester Airport Relief Road (A555). Air quality along the A6 was raised multiple times. There were also concerns raised over the cumulative impact from traffic generation from the proposal in Disley in Cheshire East for 700 homes. There were mixed reviews regarding a new station proposed at High Lane, some very welcoming and some had a preference to enhancing to Middlewood station.

There was general acknowledgment to the reduction in size of the proposal but consider any development too much and not in keeping with the village. Concerns were raised over the ecological impact of the proposal, in particular the loss of wildlife and encroaching on the Middlewood way.

There was an assumption of luxury housing being put forward and concerns that any affordable and housing for elderly would not be appropriate.

In more general terms concerns were raised that the proposal ran counter to the brownfield priority set out in the revised draft GMSF, that the proposal would result in a loss of Green Belt and that there are inadequate infrastructure and services available to support the development.

<b>Principle / scale of development</b>
<ul style="list-style-type: none"> <li>• There was concern that any development will have a detrimental effect on the character of the village;</li> <li>• This proposal does not contribute to the GMSF objectives of creating sustainable communities, minimising the need to travel and protecting the distinct character of local communities.</li> <li>• The site selection criteria used in GMSF does not apply to High lane</li> </ul>
<b>Housing (inc affordable housing)</b>
<ul style="list-style-type: none"> <li>• Many comments suggested smaller scale housing developments locally in the village rather than on one huge estate and that higher densities should be explored with more innovative design</li> <li>• There was a recognised need for housing for older people and a feeling that there were a number of older people in homes that were bigger family type homes not designed for the needs of older people.</li> <li>• The housing need calculation is inaccurate as it based on 2014 projections and therefore over-inflated</li> <li>• It was felt that more than 30% should be affordable and there was little evidence that there it was “brownfield first”</li> <li>• Location of the development and the type of housing could have potential implications for migration into High Peak so the nature of the High Peak Housing Market Area should be taken into account.</li> </ul>
<b>Employment and Economy</b>
<ul style="list-style-type: none"> <li>• There is no mention of any new long term job creation for the area, meaning that all those of working age will have to commute (mainly on the A6).</li> <li>• Local businesses rely on equestrian related trade, removal of horses would impact on this</li> </ul>
<b>Green Belt</b>
<ul style="list-style-type: none"> <li>• It was felt that the development would add to urban sprawl and that the development did not demonstrate the exceptional circumstance required to remove Green Belt and the area acts as a divide between Hazel Grove and High Lane</li> </ul>



<b>Brownfield</b>
<ul style="list-style-type: none"> <li>Brownfield use first, conversion of more mills and more use of empty homes should be explored</li> </ul>
<b>Transport – Highways / Public Transport / Cycling / Walking</b>
<ul style="list-style-type: none"> <li>The impact of the A6 Manchester Airport Ring Road/A555 has created more traffic through High Lane. Furthermore the A555 is creating more lorries to come onto the A6 and these are often seen above the 7.5 tonne restriction.</li> <li>It was felt that the High Lane Bypass should be resurrected</li> <li>Road safety is poor on the A6, congestion particularly high at peak commuting times and a number of roads in the area are in a poor condition particularly for cyclists. It was felt that development would only make this worse.</li> <li>A larger development could have resulted in an improvement to the road network</li> <li>More joined up thinking is needed on the strategic highway needs of South East Greater Manchester, North East Cheshire and North West Derbyshire</li> <li>Very mixed opinions were presented regarding the proposed new station at High Lane from support to just providing better access to Middlewood station and the implications on the Marple /Glossop lines will need further consideration</li> <li>There is a need for more bus routes especially around the Poynton area</li> <li>Transport and highways proposals put forward with the site allocation as development requirements do not adequately address the transport requirements and problems likely to be generated by this site and arguably contribute more issues to the local highways network than they resolve (the addition of additional junctions and stop start traffic on the A6).</li> </ul>
<b>Physical Infrastructure and utilities</b>
<ul style="list-style-type: none"> <li>Further cooperation is needed in terms of funding of infrastructure in co-operation with Derbyshire</li> <li>There is a clear need for the infrastructure to be in place first.</li> </ul>
<b>Social Infrastructure</b>
<ul style="list-style-type: none"> <li>It was pointed out that there are currently no school places as all primary and secondary schools are full and there is limited availability of health provision and leisure facilities in particular because Marple swimming baths has recently closed. As a result of the pressure on local amenities any social infrastructure needs to in place first.</li> <li>There was concern raised that there was no guarantee of any developer contributions</li> </ul>
<b>Environmental – Green Infrastructure, Biodiversity, open space</b>
<ul style="list-style-type: none"> <li>It was highlighted that there is a lake on the site which is home to wildlife and any development would take away country walks, wildlife and woodland as well as loss of farmland and that the site is adjacent a Site of Biological Interest</li> <li>There are extensive disused mine shafts over the site and several areas within the development are classified as 'Development High Risk Areas'.</li> <li>It is argued that views from Brookside Park to Lyme Park could be adversely affected and should be protected and at least a buffer provided in the form of woodland.</li> </ul>
<b>Air Quality</b>
<ul style="list-style-type: none"> <li>Traffic pollution is extremely high in the area of the development and it is felt that proposals in Clean Air Plan will not remedy the issue</li> <li>It is argued that the proposed development indicates that Stockport and the Greater Manchester Combined Authority lack a serious interest in reducing dangerous levels of pollution.</li> <li>Recent monitoring shows that the area already exceeded air quality guidelines even before the opening of the new road. The children in High Lane are being affected by pollution with illnesses such as asthma and allergies</li> </ul>

<b>Flood risk</b>
<ul style="list-style-type: none"> <li>• There is a risk of surface water flooding on the site as well as seepage from the canal</li> <li>• Before any development takes place the drainage should Drainage should be dealt with sustainable drainage systems in the forms of trees should be provided. There should also be further work to assess flood risk of the brook.</li> </ul>
<b>Heritage</b>
<ul style="list-style-type: none"> <li>• It is highlighted that the southern boundary abuts Marsden House which is a grade 2 listed building</li> </ul>
<b>Response to comments</b>
<p>The policy wording has been revised to be clearer that a package of mitigatory transport interventions will be required for the development to proceed. The Locality Assessment prepared for the site shows that with such measures it is possible to mitigate its likely transport impact to a less than severe level, including having regard to the cumulative impacts arising when other developments are taken into account, including those in Cheshire East.</p> <p>The policy requires that development protects and enhances biodiversity interests, including through implementing the strategic requirement from elsewhere within the GMSF to bring about an overall biodiversity net gain. Illustrative masterplanning undertaken to demonstrate the deliverability of the policy shows that it is possible to deliver the quantum of development proposed within the constraints of known biodiversity interests.</p> <p>The allocation abuts but does not encroach onto the Middlewood Way. The policy has a requirement that development makes provision for new cycle and footpaths to connect with the existing local network, including routes to/from the Middlewood Way, ensuring that existing routes within and across the site are retained.</p> <p>The policy requires that 30% of all homes provided on the site are affordable. Of the total 500 homes proposed by the policy it requires that a minimum of 150 are for older people, delivered as "all-age" accommodation. The policy requires that 30% of the 150 homes for older people are affordable. Affordable housing is defined by other policies in the Local Plan, based on evidence of both need and viability with particular reference to those in housing need and the most recent Housing Needs Assessment.</p> <p>The GMSF sets out an approach which seeks to ensure that opportunities to identify and development brownfield land are as exploited as fully as possible. Evidence on the supply of land which is both available and suitable for residential development shows that this is inadequate to meet Greater Manchester's, and Stockport's, needs during the period of the GMSF; it is therefore necessary to consider removal of land from the Green Belt to ensure that those needs can be met.</p> <p>The policy includes a requirement that the development contributes towards infrastructure including additional school places and health provision to meet the additional needs it places upon such infrastructure.</p> <p>Other concerns raised by consultees are covered by the policy or are covered by other policies within GMSF or other parts of the Local Plan. Some concerns are not within the scope of matters that can be address by a development plan or have been shown by evidence to not be an issue at this proposed allocation.</p>

**GM Allocation 39: Hyde Bank Meadows** (366 comments)

A significant portion of comments related to pressure on schools, it was raised that there are already long waiting lists at Romiley Primary School and many of the local schools are full.

Traffic congestion and air quality came through as a major concern through the comments in particularly within the Cherry Tree Estate and onto the M60 at Bredbury. The Bredbury junction was described as being very dangerous. Cumulative impact with the proposal for the Bredbury Industrial estate was raised and there were concerns over public transport in particularly with the capacity on trains.

Many consultees raised concerns over the potential loss of Tangshutt fields and the play areas, which was funded by the community as well as utility capacity particularly in terms of sewerage capacity, water pressure and gullies becoming blocked.

It is argued that there will be a negative impact of the proposal on the natural environment in the area and in particular the risk of ecological impact to the canal, views of Werneth Low and the Goyt Valley. Many comments raised concerns that there are inadequate infrastructure and services available to support the development.

<b>Principle / scale of development</b>
<ul style="list-style-type: none"> <li>The cumulative impact with Bredbury Industrial estate and neighbouring development should be taken into account.</li> </ul>
<b>Housing (inc affordable housing)</b>
<ul style="list-style-type: none"> <li>It is felt that the proportion of affordable housing should be higher and there was general confusion over what is defined as affordable housing</li> <li>It was highlighted that the figures used are not accurate and should not be based on 2014 Office for National Statistics figures but the more up to date 2016 figures</li> <li>There is recognition about age demographics and in particular the Romiley area needs new houses for the younger people and generally throughout the area there is an urgent need for more houses for those aged over 55.</li> </ul>
<b>Employment and Economy</b>
<ul style="list-style-type: none"> <li>There is a general recognition that there is a lack of job opportunities in the area and there was concern that the rural economy would lose grazing land.</li> </ul>
<b>Green Belt</b>
<ul style="list-style-type: none"> <li>Green Belt should be sacrosanct and this site does not meet the exceptional circumstances needed for any removal and prevents urban sprawl</li> </ul>
<b>Brownfield</b>
<ul style="list-style-type: none"> <li>Green Belt should be protected until the brownfield sites have been fully used and empty homes put back into use. In particular mills and factories should be put forward such as the mill off Poleacre lane and Compstall Mill.</li> </ul>
<b>Transport – Highways / Public Transport / Cycling / Walking</b>
<ul style="list-style-type: none"> <li>In terms of public transport, there is a lack of capacity in terms of parking at the station and number of carriages on the trains and there is no service to Stockport or any Metrolink. Bus routes also need to be improved.</li> <li>The existing transport infrastructure, in particular but not exclusively the road network, does not cope with the number of people currently living in the area, especially at peak times.</li> <li>Single point of access to the site along Cherry Tree Lane and Goherage Lane is not sufficient for an additional 250 homes.</li> <li>It is suggested that a A6/M60 bypass should be built to alleviate traffic flow and congestion problems</li> </ul>

<ul style="list-style-type: none"> <li>• All of the sites in the Werneth Area, as well as some of those over the border in Tameside, would put additional pressure on the Hyde Road/Stockport Road corridor which already has congestion</li> <li>• There are road safety concerns and there would be a loss of a safe walking route to school and to Romiley centre as a direct result of the development and the site will impact on the footdall in the centre of Romiley</li> <li>• It was suggested that Transport for North should be included as a statutory consultee</li> </ul>
<p><b>Physical Infrastructure and utilities</b></p>
<ul style="list-style-type: none"> <li>• There were many comments that the infrastructure should be in place before any housing is completed</li> <li>• There were concerns over loss of cycle/walking routes, loss of rights of way, sewerage capacity, water pressure and a general need for infrastructure to be robust</li> </ul>
<p><b>Social Infrastructure</b></p>
<ul style="list-style-type: none"> <li>• There are concerns about the impact of the development on Tangshutt Fields, the fields include a sports field, children's play area, gym equipment, community orchard, place for wildlife, well used walking and cycling routes.</li> <li>• There were already capacity issue raised with schools, especially in light of recent school closures and in particular the removal of the school from the Cherry Tree Estate, difficulty to get appointments with doctors and dentists and increased waiting times already Stepping Hill Hospital.</li> </ul>
<p><b>Environmental – Green Infrastructure, Biodiversity, open space</b></p>
<ul style="list-style-type: none"> <li>• The development would harm the Tangshutt Local Nature Reserve which has protected protected species on site</li> <li>• There would be a loss of wildlife and agricultural land as well as the loss of the uninterrupted views of the skyline looking over to Werneth Low and the surrounding patchwork of countryside.</li> <li>• There would also be negative impacts on Goyt Valley Landscape Character Area and concerns were raised over country path leading to the canal</li> </ul>
<p><b>Air Quality</b></p>
<ul style="list-style-type: none"> <li>• Many comments said that the Hyde Road/Stockport Road corridor already suffers from poor air quality and this pollution would get worse as a direct consequence of emission from the development</li> </ul>
<p><b>Flood risk</b></p>
<ul style="list-style-type: none"> <li>• It was highlighted that there are sink holes in area and that there was a real rik of flooding in the area and increased run off to the stream</li> </ul>
<p><b>Other</b></p>
<ul style="list-style-type: none"> <li>• There were concerns that the development would lead to increased antisocial behaviour</li> </ul>
<p><b>Response to comments</b></p> <p>The policy includes a requirement that the development contributes towards infrastructure including additional school places and health provision to meet the additional needs it places upon such infrastructure.</p> <p>The policy wording has been revised to be clearer that a package of mitigatory transport interventions will be required for the development to proceed. The Locality Assessment prepared for the site shows that with such measures it is possible to mitigate its likely transport impact to within a less than severe level.</p> <p>The proposal does not include and never has included the loss of Tangshutt Playing Fields and play areas. The area of the playing pitches and play areas are no longer proposed to be removed from the Green Belt but are within the allocation boundary,</p>

enabling the policy to place a requirement upon development that it bring about enhancements to both existing assets.

The policy requires that development protects and enhances biodiversity interests, including through implementing the strategic requirement from elsewhere within the GMSF to bring about an overall biodiversity net gain. The area covered by the allocation (but not the area to be removed from the Green Belt) has been extended to include land to the north, enabling the policy to place a requirement upon development that it bring about ecological or other enhancements to this area, in line with the national planning policy expectation that (retained) Green Belt be used positively.

The policy requires development to contribute to the area's special landscape characteristics and restore positive landscape features.

Other concerns raised by consultees are covered by the policy or are covered by other policies within GMSF or other parts of the Local Plan. Some concerns are not within the scope of matters that can be address by a development plan or have been shown by evidence to not be an issue at this proposed allocation.

**GM Allocation 40: Griffin Farm, Stanley Green ( 332 comments)**

Concerns were raised that the proposal would lead to a disproportionate loss of Green Belt in this part of Stockport, due to two large sites being in close proximity. It was raised that the Green Belt acted as a natural divide between Heald Green ,Cheadle Hulme and Handforth providing a valuable wildlife habitat.

Many comments raised concerns over traffic congestion and air quality particular with regards to the A34 which already has illegal emissions. The cumulative impact with the larger Handforth Green development of 1500 dwellings in Cheshire East was also raised as a concern in relation to traffic congestion.

In general terms many comments raised concerns that there are inadequate infrastructure and services available to support the develop

<b>Principle / scale of development</b>
<ul style="list-style-type: none"> <li>It was felt that there is a disproportionate loss of Green Belt in Heald Green and that it is unfair to expect a small village to take 46% of the borough's allocation</li> </ul>
<b>Housing (inc affordable housing)</b>
<ul style="list-style-type: none"> <li>Affordable housing should be a higher proportion although it was unclear what level of pricing was classed as affordable.</li> <li>It was highlighted that there should be more housing for the elderly</li> <li>There is a clear need for a mix of housing, attractive design but no high rise. It was generally felt that apartments could be considered to introduce variety and a new demographic. The Berkley Homes schemes, who have carried out large scale Urban Renewal Projects in London, were put forward as a good example of good equality high density development</li> <li>There was a suggestion that the development was a cynical ploy to provide a cheap mix of housing for the proposed airport city development</li> <li>It was suggested that the wrong ONS figures used and as result the housing targets should be reduced in line with the correct figures</li> </ul>
<b>Employment and Economy</b>
<ul style="list-style-type: none"> <li>The development does not improve access to jobs</li> <li>The site offers a unique opportunity to improve the connectivity and sustainability of the area, maximising the number of people living in a highly accessible location. In particular, connecting to major employment, shopping and leisure locations, but is also adjacent to employment areas including the Seashell Trust and Stanley Green Business Park.</li> <li>The development should not prevent parking on the site near Southgate offices</li> </ul>
<b>Green Belt</b>
<ul style="list-style-type: none"> <li>The application for 350 homes was refused on Green Belt grounds and it is felt that the same principle should apply to this development as the density in Heald Green village will be lost to urban sprawl.</li> <li>The economic ambitions should be reduced or aiming for a shorter plan period should be agreed if it means retaining the Green Belt.</li> <li>It is highlighted that the criteria for site selection is flawed since Green Belt in Manchester has not been considered in this locality.</li> <li>The boundary of the development as proposed does not follow any recognisable and permanent features – it is an arbitrary line on a plan, which does not reflect any fixed and defensible boundary on the ground.</li> <li>The allocation site forms a generous area of land which serves as a natural break and a clear green demarcation separating the distinct local communities of Heald Green, Handforth and Cheadle Hulme</li> </ul>

<ul style="list-style-type: none"> <li>Proposed boundary excludes land between Syddall Avenue and the A34, as well as a narrow strip of land to the immediate west of the A34 but there is no commentary on why, does not perform a meaningful role in relation to the Green Belt purposes.</li> </ul>
<p><b>Brownfield</b></p> <ul style="list-style-type: none"> <li>Many comments stated that they felt that there is enough unused warehouses and industrial areas throughout Greater Manchester to accommodate these plans. The Brownfield First initiative for example at Cheadle Royal Nurses' Home, seems to have been ignored.</li> <li>It is felt that there is a lack of transparency of other sites being considered</li> <li>There was a suggestion put forward to demolish "Merseyway" shopping centre and apartments developed to create "riverside" developments. Many comments suggested that there should be more housing planned in the town centres</li> <li>There should be no brownfield site that remain undeveloped unless exceptional reasons are detailed. More needs to be done by the GMCA to remove obstacles for developers to commit to brownfield and town centre regeneration and development, including decontaminating land, land banking and split ownership.</li> </ul>
<p><b>Transport – Highways / Public Transport / Cycling / Walking</b></p> <ul style="list-style-type: none"> <li>Transport infrastructure should be built first as the current provision is already at full capacity with road congestion, unreliable bus services and an inadequate train service and there is a clear opportunity for Metrolink extension to the area</li> <li>Phasing around the delivery of the new station is vital new railway station at Stanley Green would be most welcomed, but could be better used if some or all of the proposed houses in GMSF1 for east of the A34 (Cheadle Hulme) were added back in and taken out of Heald Green's allocation.</li> <li>It is also argued that the cumulative impact of other Greater Manchester and Cheshire East developments should be taken into account</li> <li>The likely position of the station in the centre of the site will make it very accessible to much of the housing – but in addition, it will also place the northern part of the Earl Road industrial area (Handforth) within walking distance of a train.</li> <li>With regards to car parking it is highlighted that there is a proliferation of airport parking which blights the surrounding communities. Any proposed Park and Ride facility needs to be easily accessible and visible to users, the field south of Stanley Road adjacent to the railway line and the A555 is suggested..</li> </ul>
<p><b>Physical Infrastructure and utilities</b></p> <ul style="list-style-type: none"> <li>United Utilities can't cope we are constantly having apologies for low water pressure and brown water.</li> <li>The infrastructure in this area is old. The area is supplied from the pumping station at Cross Acre Lane. These pumps have already had to be patched up to reduce their frequent failures, and they struggle to provide adequate pressure at the highest points of the village</li> <li>Infrastructure for utilities and broadband will need to be considered</li> </ul>
<p><b>Social Infrastructure</b></p> <ul style="list-style-type: none"> <li>It is felt that there is only vague reference to additional health and education provision when it is essential to provide community facilities for all ages in the proposed area so that it is not just a dormitory. As a minimum, there should be shops for essentials as well as new schools and doctors' practices.</li> <li>There were concerns that the development will mean there will be nowhere left for recreation and play, it will cause a strain on the hospitals and social care</li> <li>There were calls for more joined up thinking between different parts of the public sector, for example, planning and transport, planning and education, planning and health.</li> </ul>

<p><b>Environmental – Green Infrastructure, Biodiversity, open space</b></p> <ul style="list-style-type: none"> <li>• The development will impact on wildlife, cause more light and noise pollution, lead to a loss of public rights of way, green fields and trees. It is argued that this will lead to more mental illness because there will be nowhere to relax and get back to nature.</li> <li>• Farmland should be retained for agricultural purposes and not for further housing.</li> <li>• This site includes some good hedgerow linkages and is the last remaining green corridor between the fields to the east and west of Brooke Par</li> </ul>
<p><b>Air Quality</b></p> <ul style="list-style-type: none"> <li>• The land in question was designated as Green Belt in 1985 and is the last significant area of grassland counteracting the emission of fumes from the A34 by-pass which is already over the pollution limits.</li> <li>• More emphasis is needed on increasing tree cover on the eastern boundary of the development to provide air quality and noise mitigation benefits against the A34.</li> <li>• The development is close to Manchester Airport, The M60, M56, A34 and the A555 bypass with all the resulting pollution which will only add to the pollution in the area</li> <li>• It is suggested that the Air Quality Plan does not reflect emissions from the Airport when it should be included in any assessment of the area</li> </ul>
<p><b>Flood risk</b></p> <ul style="list-style-type: none"> <li>• The fields are water logged and contain clay and the site contains lots of ponds</li> <li>• Bruntwood Hall Brook flows through this allocation, partially in open channel and partially in culvert. The wording of the allocation should be such that the watercourse is protected and enhanced as part of redevelopment through inclusion of an adequate undisturbed buffer and de-culverting.</li> <li>• The area has an aquifer relatively close to the surface and periods of high rain result in standing water in the fields which are part of the proposed development.</li> <li>• Drainage is needed which is fit for purpose this does not mean accepting standard modelling. A more individual approach needs to be taken for this area.</li> </ul>
<p><b>Heritage</b></p> <ul style="list-style-type: none"> <li>• There is a Grade II listed building within the allocation site and the land has added value in the contribution it makes to this heritage asset and its setting.</li> </ul>
<p><b>Other</b></p> <ul style="list-style-type: none"> <li>• GMSF web based consultation portal is not easy to navigate and the questions asked are in many cases not really relevant to people from other areas who will not be familiar with proposal</li> <li>• The GMSF is placing an additional burden on developers to contribute towards infrastructure that may not be appropriate or feasible. Until the costs, land take required and delivery mechanisms are clarified, it will remain only a policy aspiration.</li> <li>• It is suggested that there is potential for development of the Gatley Golf Club site, the land with easy access exists bounded by Bolshaw Road and Wilmslow Road</li> </ul>
<p><b>Response to comments</b></p> <p>The distribution of the allocations proposed by the GMSF is established based on a clear site-selection methodology which demonstrates the proposed allocations to be the most sustainable to meet the identified gap in land required to meet future development needs. The impact of the proposals on the Green Belt has been assessed through a suite of evidence studies. The policy is worded so as to require development to be designed so as to minimise any adverse impacts on adjacent remaining Green Belt, including through use of suitable landscaping and buffer zones.</p> <p>Brownfield land has been exhaustively examined for potential housing supply over the plan period, including the inclusion of the Former Nurses' Home and up to 5,000 homes in Stockport Town Centre in that supply. The scale of housing need in Stockport means that</p>



expansion into the Green Belt is a necessity. The allocation will deliver both market housing and much needed affordable housing.

The policy requires that a minimum of 30% of the dwellings provided by the development, across a range of housing types, are affordable, including "all-age" affordable accommodation and at least 7 custom/self-build plots. These requirements is based upon evidence of need arising from the most recent Housing Needs Assessment for Stockport and of the viability of development of this site.

The policy requires that development protects and enhances biodiversity interests, including through implementing the strategic requirement from elsewhere within the GMSF to bring about an overall biodiversity net gain.

The policy wording has been revised to be clearer that a package of mitigatory transport interventions will be required for the development to proceed. The Locality Assessment prepared for the site shows that with such measures it is possible to mitigate its likely transport impact to within a less than severe level, including having regard to the cumulative impacts arising when other developments are taken into account, including those in Cheshire East . The site is well located to take advantage of proposed public transport infrastructure.

The policy includes a requirement that the development contributes towards infrastructure including additional school places and health provision to meet the additional needs it places upon such infrastructure.

Other concerns raised by consultees are covered by the policy or are covered by other policies within GMSF or other parts of the Local Plan. Some concerns are not within the scope of matters that can be address by a development plan or have been shown by evidence to not be an issue at this proposed allocation.

**GM Allocation 41: Woodford Aerodrome** (216 comments)

Comments received on the proposed Woodford Aerodrome allocation focused primarily on concerns relating to transport and in particular existing issues of congestion being worsened and the need for public transport alternatives to driving and on ensuring that new housing meets the local area's particular needs. With regards to the latter of these, the need for affordable housing appears of paramount importance to consultees but also the need to provide smaller housing to meet the needs of older people and young people/couples rather than larger family housing (in recognition of the changing demographics of the area).

As well as wide support for provision of affordable housing there was some support for this allocation in preference to others proposed in the revised draft GMSF because of the site being previously developed.

<b>Principle / scale of development</b>
<ul style="list-style-type: none"> <li>It is argued that an extra 750 houses would completely overwhelm and ruin the feel of Woodford village.</li> </ul>
<b>Housing (inc affordable housing)</b>
<ul style="list-style-type: none"> <li>There is a need to ensure there is a mix of housing type and to plan for older people's housing</li> <li>Many comments state that there is not enough affordable housing on the site and these should be low cost starter homes</li> <li>It is argued that the design standards of the area will be weakened which is unfair on existing residents who bought into the garden village ethos. In the absence of sufficient evidence to justify it, the policy should not identify a minimum level of affordable housing provision in the site.</li> </ul>
<b>Employment and Economy</b>
<ul style="list-style-type: none"> <li>The development will cause disruption to local businesses due to impact on infrastructure and transport disruption and many comment stated that there are no amenities or job creation sites in the locality to sustain an additional 750 homes</li> <li>It is argued that this site would be a perfect site for an Industrial Estate to compliment Adlington Industrial estate and there were concerns that this plan would put the whole of the development in Woodford into the hands of just one developer.</li> </ul>
<b>Green Belt</b>
<ul style="list-style-type: none"> <li>Many comments highlighted that the site provides a "green lung" between adjacent urban areas and that the cumulative impact with other Greater Manchester strategic sites will have a negative impact on Green Belt</li> <li>Reduced green spaces such as that for recreation at Avro golf course effects wildlife and leads to poorer mental health and well being</li> </ul>
<b>Brownfield</b>
<ul style="list-style-type: none"> <li>Many comments said that the focus should be brownfield sites and town centres. There were some supportive comments raised in relation to the allocation primarily overlapping the aerodrome and hence on brownfield land.</li> <li>Development should, instead, be around existing sites in Stockport, which is in bad need of development and can more easily provide the affordable housing that the area needs.</li> </ul>
<b>Transport – Public Transport / Cycling / Walking/ Congestion</b>
<ul style="list-style-type: none"> <li>Public Rights of Way and other paths should be provided to link in with the other routes that are coming through on the current build to take advantage of routes on the relief roads in the area.</li> <li>It is highlighted that there is an absence of vastly improved inward train services from Poynton Station and Metrolink in the area. It is argued that a station should be built at</li> </ul>

<p>Woodford on the line between Adlington and Poynton and that there is a need for more buses</p> <ul style="list-style-type: none"> <li>• Many respondees commented about the congestion in the area with particular pinch points being the A555, Bramhall Land and A6 and Bonnis Hall Lane</li> <li>• The scale of the allocation is likely to give rise to traffic impacts on both an individual and cumulative level due to the proximity of the site allocation at the M56 via M56 Junction 5 and the M60 South-East Quadrant via the Gatley Crossroads. It is also argued that there is not enough access for the site, given the number of houses.</li> <li>• The airport should also be subject to requirements to insulate against aircraft noise.ont he site</li> </ul>
<p><b>Physical Infrastructure and utilities</b></p>
<ul style="list-style-type: none"> <li>• A large housing development such as the one put forward will make high demands locally on water supply, drainage and sewerage and the infrastructure proposals are not far-reaching enough given the cumulative impact from neighbouring development on infrastructure and key services</li> </ul>
<p><b>Social Infrastructure</b></p>
<ul style="list-style-type: none"> <li>• There is not enough school provision and health facilities currently and key services will struggle to deal with any increase in housing growth</li> </ul>
<p><b>Environmental – Green Infrastructure, Biodiversity, open space</b></p>
<ul style="list-style-type: none"> <li>• It is argued by many respondees that there is a need for more affordable environmentally friendly housing putting nature and our planet first and concerns over the potential loss of farmland and any future contribution to local food or renewable energy production</li> <li>• There are important views in and outside of the Peak District National Park and Alderley Edge that need to be afforded protection and there is an abundance of native trees, native hedgerows and ponds on the proposed site. In particular the site contains a pocket of deep peaty soil at the centre of the site.</li> <li>• The site should be amended to reflect the aims of the Greener GM Chapter in the GMSF and provision should be considered for new woodlands and other natural space</li> </ul>
<p><b>Pollution</b></p>
<ul style="list-style-type: none"> <li>• As a result of the development it is argued that there will be an increase in the level of emissions of greenhouse gases, more carbon released and more light and noise pollution in what is already an area of high pollution due to the A555.</li> </ul>
<p><b>Flood risk</b></p>
<ul style="list-style-type: none"> <li>• It is highlighted that surface water from the development will drain into Red Brook and the River Dean which may cause a flood risk downstream near the Deanwater Hotel and in Handforth. In response to this Sustainable Drainage Systems enabled street trees should be includedint he site</li> <li>• There were also policy suggestions raised relating to the Groundwater Source Protection Zone</li> </ul>
<p><b>Heritage</b></p>
<ul style="list-style-type: none"> <li>• It is argued by some respondees that development around the historic farms on Old Hall Lane would detract from their unique historic character as farm buildings and the boundary includes a grade II listed building</li> </ul>

**Further comments on the overall proposals for Stockport, including strategic transport interventions (279 comments)**

<b>Principle / scale of development</b>
<ul style="list-style-type: none"> <li>The sites in the south of the borough are too far from the city centre or Stockport town centre to be regarded as sustainable</li> </ul>
<b>Housing (inc affordable housing)</b>
<ul style="list-style-type: none"> <li>There was suggestion put forward that the site selection methodology is flawed and that certain sites should have been passed onto phase 2.</li> <li>There were supportive comments regarding of apartments in the town centre</li> <li>There was a call for more accurate housing/population projection figures and adopting realistic growth figures</li> <li>More higher density development is needed particular near transport hubs</li> <li>Pressure on the northern allocations could be relieved by the southern regions taking their 'fair share' of additional housing instead of being protected.</li> <li>Volume house builders favour large new green field developments</li> <li>The GMCA should also review what can be done to reduce the amount of 'land banking'</li> <li>Affordable housing still deemed to be unaffordable to many people</li> </ul>
<b>Employment and Economy</b>
<ul style="list-style-type: none"> <li>The overall quantum of employment sites required appears overly high</li> </ul>
<b>Green Belt</b>
<ul style="list-style-type: none"> <li>There was support for the Green Belt additions and it was suggested that Mirlees fields should also be given Green Belt protection and the Adswood addition should be expanded</li> <li>There was general concensus that there should be no Green Belt loss and particular concerns over the loss of Woodley's Green Belt</li> <li>It was argued that the decision to alter the boundary of the Green Belt should be down to the relevant local authority and not at a strategic Greater Manchester level.</li> </ul>
<b>Brownfield</b>
<ul style="list-style-type: none"> <li>More development should be focussed on the district centres and there were positive comments in terms of the planning for the reuse of brownfield sites and town centre regeneration</li> </ul>
<b>Transport – Highways / Public Transport / Cycling / Walking</b>
<ul style="list-style-type: none"> <li>There is a need to reconsider access through Heald Green and protect playing fields</li> <li>There were positive comments on proposal for an additional train station in Cheadle and a call for Metrolink in the district</li> <li>Better highway infrastructure feeding the main arterial roads – A6.</li> <li>A much improved and coordinated public transport system and more park and ride facilities with some incentive to use them needs to be in place.</li> <li>The improved transport interventions need to be in place and working before any more housing is built.</li> <li>The Bus Rapid Transit should not be in isolated roads but integrated into existing network</li> <li>The Rapid Transit Busway should follow existing roads through Woodford, with minimal disruption to countryside,</li> <li>Need investment in local train stations and train routes - more carriages at peak times from local stations and newer train stock</li> <li>Welcoming new transport interchange at Stockport</li> <li>Welcoming of the Marple tram-train line to connect to the Reddish South/Denton line</li> <li>Improved cycle paths</li> </ul>

<ul style="list-style-type: none"> <li>• The proposal for tram-train on the routes to Marple and Rose Hill is welcome, though progress has been slow, provided adequate capacity is required. Similarly improved services on the routes to Hazel Grove and Buxton are urgently needed, but do not seem to be included.</li> <li>• The strategic transport interventions are not ambitious enough</li> <li>• Transport needs to be eco friendly</li> <li>• The recommendations of the 2015 A6 Study have not been implemented in 4 years.</li> <li>• Bus network for accessing the National Park should be promoted</li> <li>• A comprehensive traffic management plan is needed for wider network</li> </ul>
<p><b>Physical Infrastructure and utilities</b></p>
<ul style="list-style-type: none"> <li>• Instead of adding more infrastructure to the area to support extra services, the focus should be on improving the services we do have, before determining if more services for the area is required.</li> <li>• it is not clear that the necessary supporting infrastructure can be delivered and delivered in a timely fashion</li> </ul>
<p><b>Social Infrastructure</b></p>
<ul style="list-style-type: none"> <li>• Pressure on schools, distances already too far to travel</li> <li>• Education and health facilities should be provided before the housing</li> </ul>
<p><b>Environmental – Green Infrastructure, Biodiversity, open space</b></p>
<ul style="list-style-type: none"> <li>• Need to recognise importance of food growing</li> <li>• Don't remove bridal ways</li> <li>• There are important views in and outside of the Peak District National Park that need to be afforded protection.</li> <li>• Food production should not be ranked below recreation in the order of priorities.</li> <li>• The black hole of a river gap compares very badly with the floral displays and feature waterways of other towns and cities.</li> <li>• Protection of wildlife corridors and woodland</li> </ul>
<p><b>Air Quality</b></p>
<ul style="list-style-type: none"> <li>• Issues raised primarily with the Heald Green and High Lane allocation</li> </ul>
<p><b>Other</b></p>
<ul style="list-style-type: none"> <li>• 'Many of the key themes of the revised draft are very much aligned to the desires of our residents at the local level' (Marple Neighbourhood Forum)</li> <li>• This consultation layout is shocking</li> <li>• The GMSF needs to take account of neighbouring development in other boroughs</li> </ul>
<p><b>Response to comments</b></p> <p>The policy wording has been revised to be clearer that a package of mitigatory transport interventions will be required for the development to proceed. The Locality Assessment prepared for the site shows that with such measures it is possible to mitigate its likely transport impact to within a less than severe level, including having regard to the cumulative impacts arising when other developments are taken into account, including those in Cheshire East.</p> <p>Brownfield land has been exhaustively examined for potential housing supply over the plan period. The scale of housing need in Stockport means that expansion into the Green Belt is a necessity. The allocation will deliver both market housing and much needed affordable housing.</p> <p>The policy requires that a minimum of 45% of the dwellings provided by the development, across a range of housing types, are affordable, including "all-age" affordable</p>

accommodation and at least 11 custom/self-build plots. These requirements is based upon evidence of need arising from the most recent Housing Needs Assessment for Stockport and of the viability of development of this site.

The policy includes a requirement that the development contributes towards infrastructure including additional school places and health provision to meet the additional needs it places upon such infrastructure.

Other concerns raised by consultees are covered by the policy or are covered by other policies within GMSF or other parts of the Local Plan. Some concerns are not within the scope of matters that can be address by a development plan or have been shown by evidence to not be an issue at this proposed allocation.

### 3.2.10. Strategic Allocations in Tameside

There are 3 allocations in Tameside. There were 3,495 comments received in relation to the Tameside allocations.

#### **GM Allocation 42 Ashton Moss West, Tameside** (228 comments)

The majority of objections are in relation to the principle of Green Belt loss. Respondents have noted that the site serves a purpose in terms of local recreational space, prevention of urban sprawl and that development would result in the loss of a mature natural environment (peat), biodiversity and habitat.

Support has been shown for the redevelopment of brownfield sites in the first instance as a means to meet identified local housing need and to provide employment opportunities across Tameside.

Whilst many respondents raised transport and local traffic congestion and social infrastructure as key issues; both in terms of existing capacity as well as the additional provision which will be required; others have noted the sites proximity to the motorway network and key public transport provision and proximity to Ashton Town Centre. Air quality, pollution and flooding have also been identified as potential issues.

<b>Principle / scale of development</b>
<ul style="list-style-type: none"> <li>• General objection to the proposed development.</li> <li>• Increase industrial allocation and extend employment use classes to include B1(a) similar to Alexandra Business Park.</li> <li>• Consideration for a mix of uses including residential and employment.</li> </ul>
<b>Housing (including affordable housing)</b>
<ul style="list-style-type: none"> <li>• Building new homes on the Green Belt is fundamentally wrong and will not solve the housing market crisis.</li> <li>• The housing target should be lowered until all alternative sites have been explored with the exception of Green Belt sites.</li> <li>• Support for the development of new homes on previously developed land and on vacant employment sites.</li> <li>• Tameside’s affordable housing need can be met through the compulsory purchase of vacant homes and by funding to improve existing homes.</li> <li>• Residential development at ‘Market Street’ and on the former Robertson’s Jam site is enough.</li> <li>• Proposal does not support the objective for sustainable affordable housing and there is concern that the proposed residential development on this site will not provide homes for households on low incomes and first time buyers.</li> <li>• Development will affect local property prices.</li> <li>• Distribute new homes across the borough to take advantage of existing infrastructure and put new infrastructure in place prior to the construction of new homes.</li> <li>• Some support for additional new homes and in particular affordable environmentally friendly new homes close to the motorway network.</li> </ul>

### **Employment and Economy**

- Loss of wildlife and habitats, acceleration of climate change, noise, light, pollution and decrease in air quality, increase in traffic and congestion and the impact of access arrangements, house prices, operating hours and privacy on adjacent residential properties.
- No guarantees as to which businesses will occupy the site in the future and the potential impact that employment development will have on existing local businesses.
- Employment development will have negative impact on traffic/ highways infrastructure particularly at peak times around Manchester Road and M60. There will also be a negative impact on neighbouring property during the construction phase.
- No guarantee over what businesses may occupy the site and sceptical that jobs and training will be delivered as a result of the proposed development.
- Floorspace figure does not provide an indication of the number of new jobs that will be created. Economic ambitions should be realistic and not require development of Green Belt.
- There is objection to the loss of stables on site as a result of employment development.
- New businesses should be encouraged to locate within town centres, utilise empty property and brownfield land in the first instance and redevelop and invest in existing industrial estates such as Shepley.
- Former Robertson's site could be used for employment.
- Existing local businesses will be negatively affected by the proposed development (traffic/roads/construction).
- Some support for land to provide for economic development and job creation for local people.
- Delivery of 175,000 m2 of employment use with associated infrastructure in a sustainable location with access to motorway network, public transport and infrastructure is in close proximity to Snipe Retail Park and an established employment area and will therefore create a logical extension to the urban area and deliver a well-connected business park which will support communities with economic activity and be able to compete at a GM level.
- Proximity to Plot 3000 has potential to deliver a range of employment uses across both sites, thereby increasing the employment offer in East Manchester.
- Investment is required to attract business and jobs for local people – 90% of Tameside residents commute out of the borough for work.
- Development of the site will require master planning with a focuses on the transition/buffer between existing residential properties and the proposed employment development and sufficient off-road parking.
- Policy should be clear that town centre use are not appropriate on this site and will need to have regard to the Plan's retail and town centre policies.
- Support for additional employment/jobs in the area given the number of businesses that have closed in Ashton-under-Lyne town centre. Additional employment land will support and incentivise additional residential development within Tameside.

### **Green Belt**

- The majority of respondents objected to the loss of Green Belt land and the allocation GM-A44 in particular, supporting the sites retention in the Green Belt and its ecological enhancement.
- Allocations should not contradict GM wide policies - particularly Green Belt which is seen as the easy option for development but prevents urban sprawl
- Proposed development would result in substantial harm and loss of the only Green Belt in the area and will not constitute very special circumstances.



<b>Brownfield</b>
<ul style="list-style-type: none"> <li>• Much support for a brownfield first approach to the development of new homes and employment. Demand for new homes and employment land should be confined to existing brownfield sites given that there are sufficient sites to meet need with a number of alternative brownfield sites identified for redevelopment.</li> <li>• Not all brownfield land has been identified on the Brownfield Land Register..</li> </ul>
<b>Transport – Highways / Public Transport / Cycling / Walking</b>
<ul style="list-style-type: none"> <li>• Transport remains a key area of concern should development of the site for employment and/or residential come forward.</li> <li>• Traffic congestion results in roads being at a standstill during rush hours and gridlocked at weekends. Congestion extends into Ashton-under-Lyne, towards Manchester via Manchester Road and Droylsden, on the M60 and M67 and across Tameside.</li> <li>• Development will have a knock-on impact on existing businesses leading to a possible reduction in revenue.</li> <li>• Concern that roads are dangerous for families to walk beside and for horse riders to use. Additional concern over the national increase in the number of RTAs between vehicles and horse riders.</li> <li>• Development will put unsustainable pressure on existing roads, raise air pollution and increase the number of cars and HGV's in the area and those using public transport including the Metrolink.</li> <li>• Concern over the loss of local recreational space particularly for those with mobility issues and access to alternative recreational spaces e.g. Daisy Nook.</li> <li>• Metrolink has had a negative impact on local businesses and jobs as it provides easy access into Manchester.</li> <li>• Support was noted for their sites proximity to Junction 23 M60, access to public transport (rail, bus and metro link stations) and ongoing investment in the Transport Interchange in Ashton-under-Lyne town centre.</li> </ul>
<b>Physical Infrastructure and utilities</b>
<ul style="list-style-type: none"> <li>• Concern that existing local infrastructure and amenities are at breaking point and will not be able to support an increase in demand resulting from the proposed development.</li> <li>• There was some support for employment use of the site and that there is existing infrastructure in place..</li> </ul>
<b>Social Infrastructure</b>
<ul style="list-style-type: none"> <li>• Although the site's proximity to Tameside Council Offices and colleges has been acknowledged there remains concern that existing social infrastructure including hospitals, GP surgeries, healthcare providers, schools and public services are over stretch/ oversubscribed and will not be able to support an increase in demand resulting from the proposed development.</li> <li>• Concern that deficiencies in social infrastructure have not been addressed as part of the allocation and that investment is required prior to development of site.</li> <li>• Concern that residential development and resultant increase in population will put additional strain on public services such as school/ GP and hospital places and waiting times.</li> </ul>
<b>Environmental – Green Infrastructure, Biodiversity, Open Space, Recreation</b>
<ul style="list-style-type: none"> <li>• Allocation site noted for being a free, accessible and mature greenspace which provides a habitat for diverse range of wildlife and a recreational function for the local community.</li> <li>• Allocation will contradict greenspace strategy.</li> <li>• Site is grade 2 agricultural land and includes farms, fields and stables rich in underlying peat/ deep peaty soils/ peat and should be safeguarded, restored in line with Draft GMSF Policy GM-G 10 Net Gain Enhancement of Biodiversity Point 8.</li> </ul>

- Much of Ashton Moss has already been subject to development of approx. 200 acres of land for retail and leisure uses. Allowing additional development would further reduce Green Belt in the area.
- Development of site would have a negative impact on mature natural environment with loss of biodiversity, habitat and ecology (wildlife/ animals/ birds/ plants/ protected species). Habitats and wildlife are starting to recover following the development of the M60 and Ashton Moss.
- Limited amount of greenspace in the area should be protected and not sold off by the local authority.
- Limited amount of greenspace between Manchester City Centre and Ashton under Lyne and is more important than employment.
- Site provides access to the countryside and recreational uses including informal play, walking, cycling and horse riding.
- Scenic, safe, non-motor vehicular route between Richmond Street Cricket Ground and Sandy Land.
- Concern over the loss of horse stabling and grazing land and general loss of local amenity
- Loss of site may impact on access to recreational space by those with low mobility.
- Need to review Natural England's advice on protected species.
- Site would be more suitable as a park with interpretive centre and as a gateway to the Pennines.
- There was support for the retention and enhancement of greenspaces including a fund to maintain the landscape and ecosystem and also a masterplan that includes Green Infrastructure to secure biodiversity
- It was noted that development will not impact on Daisy Nook which is an essential recreational space for residents and that existing footpaths and a bridle paths will be retained.
- There was also support for a landscaped buffer between existing residential properties and proposed footpath/cycle path/development.

**Air Quality (including climate change and pollution)**

- Existing Air Quality Management Area to south and west of M60/A6140.
- Retention of greenspace assists in reducing pollution levels and provides local recreation space which avoids the need to travel thus reducing the level of pollution from motor vehicles.
- Development will result in an increase in traffic and congestion that will contribute towards global warming through an increase in CO2 and greenhouse gas emissions. Development and urbanisation also contributes towards changes to weather patterns including wind and flooding.
- Insects are dying due to pollution.
- Development will result in an increase in pollution (including noise and light) and a decrease in air quality.

**Flood risk**

- A number of issues were highlighted in relation to flood risk due to the sites composition as a moss/peat substrate overlaid with imported material following construction of M60 and Ashton Moss.
- Water table has risen following the construction of the M60.
- Existing drainage issues on site with attenuation ponds, ditches and drainage channels.
- Concern that development will increase flood risk.

**Heritage**

- Development will obscure views towards Hartshead Pike.

**Other (including viability, town centres, health and wellbeing)**

- Support for the relocation of business to and the redevelopment of town centres, including reuse of empty property for residential use given the closure of businesses and shops.
- Questioning whether the redevelopment of the site is commercially viable given the site is a former landfill site and peat bog and would this result in additional non-commercial uses required to bring site forward?
- Object to Government standard methodology for assessing Local Housing Need and GM objectively assessed need for employment land
- Object to the use of the 2014 household projections, as set out in the 2018 Standard Methodology for Assessing Local Housing Need, rather than the 2016-based household projections.
- Masterplanning exercise to include phasing strategy including the Stockport sites.
- Reduce plan period/housing target in line with amount of identified brownfield sites.
- Future consultation on the GMSF should be extended to include direct correspondence with neighbouring properties.
- Topography of site is challenging with a significant part of the site subject to imported material from the excavation material from the M60. Development in this location will require remodelling/ ground remediation and is not suitable for standard building techniques.

**Response to Comments**

The case for exceptional circumstances are set out for the Green Belt as a whole and the specific case for this site within accompanying topic paper.

The site has been identified for employment uses only and does not propose residential development or set a housing target. Policies need to be read across the plan as a whole.

The use classes considered appropriate are set out within the policy, which identifies 160,000 sqm of employment floorspace, primarily within the E(g)(ii), E(g)(iii) and B2 use classes. This additional floor space could be utilised for grow on space for existing businesses or to accommodate inward investment. Employment, education and training opportunities are required to be available for residents within the local area.

Policy requires a comprehensive masterplan, phasing strategy and design code developed through engagement with the local community, Council and other appropriate stakeholders. In addition the character of and interface between, new and existing development including the setting of heritage assets and surrounding residential dwellings and gardens, are sensitively designed and acknowledged by development proposals.

Policy recognises the need to protect and enhance key landscape and ecological features including trees and woodlands, watercourses and ponds and a Preliminary Ecological Appraisal has been undertaken. Moreover policy GM-G 9 covers the concept of net enhancement of biodiversity and geodiversity. Public rights of way, sustainable travel routes, enhancement of connectivity and the setting aside land for a range of public open spaces are also identified within the policy.

Policy requires the provision of developer contributions toward transport infrastructure as deemed appropriate and a Locality Assessment has been undertaken to assess impact on highway infrastructure and set out mitigation options. Policy recognises the presence of an air quality management area to be considered through the masterplanning process, more over policy GM-S 6 covers the concept of clean air.

Policy recognises the need for development proposals to be informed by a detailed earthworks and remediation strategy and a Preliminary Geotechnical Report has been undertaken. Moreover Policy GM-G 9 recognises that a limited amount of development on agricultural land is necessary, alongside requiring appropriate assessment.

A level two Strategic Flood Risk Assessment has been undertaken where relevant across the plan and policy identifies that a site wide drainage strategy will be needed, incorporating sustainable urban drainage systems. Moreover Policy GM-S 5 covers the concept of Flood Risk and the Water environment.

A viability assessment has been undertaken and the site shown to be viable.

### **GM Allocation 43 Godley Green (1,097 comments)**

The majority of objections were concerned with three key themes Green Belt loss; transport issues; and the provision of social infrastructure. The principle of Green Belt loss was objected too for a wide range of reasons, ranging from coalescence of Godley, Hattersley and Hyde, visual impact, loss of land for recreation purposes (specifically for horse riding and walking) and the impact upon ecology.

Transport issues included existing highway congestion around Hyde, Mottram and the M60/M67 motorway network; and inadequate and poor quality public transport. This issue of increased congestion was generally linked to a worsening of the existing air pollution problem and this was further linked to the negative impact on respiratory health.

Social infrastructure (education and health) was an area of great concern, with many respondents highlighting current inadequacies and the lack of proposed new provision. Across the board there was a general theme that a broad range of infrastructure improvements needed to take place before any additional development was carried out, particularly around implementation of a Mottram Bypass.

Other key themes that emerged from the responses were: the failure to identify and prioritise brownfield development (with numerous sites given as example); the focus on the Hyde area for new housing development, the perception that the amount of housing identified in the plan for Tameside significantly exceeded the amount required during the plan period (2,790 units vs 1,542); the negative impact on wildlife and habitat that the proposal would have; and having a focus on town centre residential led regeneration

<b>Principle / scale of development</b>
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| <ul style="list-style-type: none"> <li>• Highlights the disproportionate level of development proposed for Hyde with a cumulative impact from the GM-A44 proposal and that Tameside are 80% over the housing quota required by the GMSF.</li> <li>• Size of the development proposed is inappropriate for the area.</li> <li>• Concerns expressed about the ability of developer(s) to deliver the 2,350 dwellings identified over the pan period given the complexity of site ownership, constraints, and the preparatory work and infrastructure required.</li> <li>• That Godley Green Garden Village only scored moderately against the site selection criteria was highlighted against the fact that better performing sites have been discounted and removed from the plan.</li> <li>• Support for the proposed allocation alongside the existing Hattersley Station as it will promote stronger communities in a countryside setting with facilities and infrastructure to sustain the development.</li> <li>• The Garden Village is the only viable way to meet local housing needs well beyond the plan period whilst acknowledging that the site would only be likely to deliver a larger number of dwellings in the second half of the plan period.</li> <li>• Site is considered available with a clear commitment from landowners who own the majority of the site following signing of a draft MoU.</li> <li>• Expected that landowners will enter into a formal partnership ahead of adoption of the GMSF and any planning application submission.</li> <li>• The suitability of the site has been established through the use of site selection criteria; although it is recognised that only part of the site was subject to the planning constraints assessment.</li> <li>• Analysis of the site constraints has allowed a set of design principles to be established in order to deliver a Garden Village.</li> </ul> |
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**Housing (inc affordable housing)**

- Acknowledge that new homes, including affordable, are required to meet local need, but object to loss of Green Belt. Furthermore, some did not accept the severity of the housing shortage and did not want it to be used as justification for Green Belt development.
- Many quotes of government ministers on local housing need and targets highlighting Green Belt as a constraint that could reduce the housing target.
- Claimed the housing numbers are unjustified and overestimated and submitted alternatives to the requirement, concluding that the housing target is too high, based on out of date ONS data and does not take into account the EU referendum and the effects of Brexit and therefore the proposal should be deleted.
- Affordability of proposed housing questioned - the homeless and those on low incomes will not benefit from the proposal. Executive homes are not required as this focus means more affluent people who are likely to commute.
- Only a low proportion of affordable housing is identified as part of the proposal and the precise number is not stated in the policies. Suggestion that developers will control the level of affordable housing delivered.
- Parts of Godley Green could be used for affordable housing while other parts remain as Green Belt.
- Suggests that because of topographical and landfill constraints that the density of development would be high and not executive homes as proposed.
- Housing needs to be a 50% mix of social with a range of purchasing options.
- Existing housing development being built in Hyde and across Tameside is not selling and the high number of properties available locally indicates there is not local housing need. This is compared to Romiley where house demand and prices are higher.
- There should be greater emphasis on regenerating Hattersley.
- The Garden Village must live up to its billing. It must feature housing of every size and tenure, including homes for social rent and shared ownership.
- Any large scale housing project also needs to exceed current building regulations to address environment concerns.
- Points out that the predicted demographic change shows that Tameside needs additional housing for single people and the elderly, who progressively require increased care and that building on Godley Green will not provide suitable housing.
- It is considered that criteria 4 of the site specific policy should not make reference to making use of the most up to date HNA and that this should be worded more closely with other GMSF site policies which reference to incorporating a broad mix of housing types and tenures to provide sufficient control and flexibility for future development.
- It is considered that criteria 5 of the site specific policy could be merged with criteria 4 given that custom and self-build units are different types of dwellings.
- Support for additional housing as this will assist in meeting the full range of housing needs identified in the Tameside. The area desperately requires a greater diversity of available homes – lack of choice forces people away from the area.
- The phasing in 2 villages, with clear methodology of tenure and property mix, good design, identity and need for a focal point or community hub with retail are strongly supported because it allows providers to plan and phase developments to ensure lettings or sales demand match any proposed build rate, thereby avoiding risk of a 'ghost town' with over-supply in one location.
- A unique opportunity to create quality, eco-friendly housing with excellent public transport links.
- Site is considered to be in a suitable and viable location for large scale housing which can deliver a significant proportion of the Council's housing need through a high quality development that reflects garden village principles.

<ul style="list-style-type: none"> <li>• While there are a number of site constraints, it is considered that there are none that could not be overcome through further detailed design work and or mitigation measures.</li> <li>• The detailed wording of site specific policy for Godley Green is broadly supported by the landowners and is considered to be a suitable mechanism from which future development at the site can be assessed.</li> </ul>
<p><b>Employment and Economy</b></p> <ul style="list-style-type: none"> <li>• There are limited employment opportunities in the local area and this fact increases the need for people to travel to access employment.</li> <li>• Too much office space has been identified for the growth that will take place over the plan period.</li> <li>• Criteria 9 of the site specific policy for Godley Green is supported in so far as it identifies the role of two villages each with a local hub, however it is felt alongside community and retail facilities, other uses should also be considered in the interests of flexibility, these could include residential development such as flats above retail units and other main town centre units at a scale to serve the needs of the proposed communities.</li> <li>• Development will result in a loss of equine related jobs, including those within the supply chain, this is estimated to be 100.</li> </ul>
<p><b>Green Belt and Green Belt Additions</b></p> <ul style="list-style-type: none"> <li>• Loss of Green Belt – leading to coalescence of settlements, encroachment into and suburbanisation of the countryside, urban sprawl, and harm to the rural economy, loss of residential amenity, harm to habitat and ecology and loss of a resource which provides great public benefit.</li> <li>• The proposed change in Green Belt designation is driven not by the need for housing, but by developer demand because it is more profitable to develop than brownfield sites.</li> <li>• Highlights the GM Green Belt Assessment conclusion that the site's role was strong and exceptional circumstances are not justified for its release. This was also used as justification for the release of other less well performing areas of Green Belt for development.</li> <li>• Continued Government commitment to Green Belt.</li> <li>• Queries where the evidence is that the Council has considered all alternatives before identifying Green Belt for development.</li> <li>• Retaining it as such would help to drive urban regeneration.</li> <li>• Highlights the intended long term nature of the Green Belt designation.</li> <li>• The loss of Green Belt is linked to increasing obesity and mental health issues.</li> <li>• Green Belt additions are questionable and do not fulfil the purposes and do not compensate for the loss.</li> <li>• Consider that the sites contribution toward the Green Belt purposes is less than as set out through the appraisal. Against purpose 1a and purpose 3 it is considered to be moderate as opposed to strong.</li> <li>• Agree with the criteria which have been used to assess Green Belt parcels, the site selection methodology in general and that parcel meets criterion 1, 5 and 6.</li> <li>• Considered that the site also meets criterion 7 as it provides the opportunity to diversify the housing market, contributing toward northern competitiveness.</li> <li>• Agree with additions to the Green Belt in Tameside at Mottram, Broadbottom and Hyde and for removing the previous allocation 'Mottram M67' proposed within the 2016 draft plan.</li> </ul>
<p><b>Brownfield</b></p> <ul style="list-style-type: none"> <li>• A brownfield first approach and town centre regeneration was supported as the focus of the plan and as an alternative to Green Belt release.</li> </ul>

- The industrial legacy of the North West was highlighted alongside the opportunity this presented for the re-use and/or CPO of brownfield sites, vacant and derelict properties. Many were specifically identified and proposed for affordable housing as they are better located to take advantage of existing infrastructure.
- Opportunities for relocation of businesses and services were identified in order to open up opportunities for residential redevelopment in and around Hyde town centre, including along the canal and incorporating a canal basin.
- The need for an up-to-date and comprehensive Brownfield Land Register was highlighted as thousands of homes could be delivered on brownfield sites.
- Jonathan Reynolds is quoted as stating that all of the 11,200 dwellings required for Tameside could be accommodated on brownfield.
- The drop in the housing to be delivered in Tameside since the previous consultation maintains the contribution from Green Belt at 25%. Therefore there is not a brownfield first approach as promised by the Mayor of Greater Manchester.

**Transport – Highways / Public Transport / Cycling / Walking**

- Current traffic issues highlighted, particularly congestion on the M67/A57 Hattersley/Mottram and Denton Island, M60 J23 to J4 and the A560 towards Bredbury. Existing highway infrastructure will not be able to support potential increase in traffic arising from development and no new infrastructure has been identified and no traffic modelling has been carried out.
- Mottram/Hollingworth bypass will be a priority to support the delivery of residential development to the east of Hyde. Consideration should be given to the cross boundary highway matters with Stockport.
- Congestion will force people to cut through Gee Cross to get to Stockport.
- Sufficient off road parking needs to be made available.
- Road safety is an increasing issue for all road users with increased levels of traffic will make it more difficult for pedestrian movement and for horse riders to cross Stockport Road.
- General lack of public transport, particularly on weekends.
- The current rail network is overstretched, poor quality and standing room only during rush hour from Hattersley and it is only good for accessing Manchester.
- Rail network would be negatively affected with the proposed Gamesley station and new housing being delivered in Glossop being identified as contributing factors.
- The capacity of the service should be increased today and it was questioned how the proposed move to tram/train would increase capacity.
- Can the Piccadilly-Marple Rose Hill line be adapted to Metrolink as it is not electrified?
- Sceptical about the delivery and investment required to improve the local rail network to support an increase in local population.
- Network Rail highlight the need to understand the impact the increase in development will have at Hattersley Station and whether there is an opportunity through developer contributions to improve existing facilities at the station.
- Hattersley train station would have to be significantly redeveloped.
- Physical constraints of the rail network were highlighted which would prohibit increasing rail services.
- It is a false assumption that all future residents will be commuting into Manchester by train.
- Funding has not been identified in relation to improving public transport matters including tram/train and additional rail capacity.
- Loss of public rights of way is highlighted as a major concern. The area's used by cyclists, runners and walkers and the existing PROW must be retained.
- Friends of the Trans-Pennine Trail highlight that the TPT is not shown on the site plan and that non-motorised users are low down on the list of priorities. The route currently



uses Green Lane and the proposal presents the opportunity to re-route the trail as part of the Garden Village proposal. This is shown on an attached map.

- Proposed bridge between Godley Green and Hattersley Station will not be sufficient to support 4,000+ additional cars.
- Transport plans need to be much more advanced before any consideration is given to redeveloping Green Belt - suggested improvements - 'smart motorway' between Jun 4 - 24 M60, tram/train service on Glossop and Marple lines, Woodley Station improvements to include extending operating hours, additional carriages during peak hours and additional parking at stations.
- Ashton Moss is supported as much better and well connected location for development.
- Stalybridge should accommodate major new residential development given the proposed extension of Metrolink from Ashton identified in the TfGM strategy, alternatively Metrolink could be extended to Hyde.
- The site is well connected to Manchester city centre with the Glossop line accessed via Hattersley station (although acknowledged that it is not currently accessible from the site), providing services every half hour. The A560, along which bus stops are located, provides connections to nearby settlements. The M60 motorway is also within proximity. The site has the benefit of good local networks, cycle routes and rail links.
- A transport strategy is currently being developed to ensure that future residents have a genuine choice in the way they travel within and from the site.
- Vehicular access will be taken from Mottram Old Road along the southern boundary and direct links to Hattersley station via a new pedestrian/cycle bridge.

#### **Physical Infrastructure and Utilities**

- Highlights that the population of Tameside has been stable for decades and actually declined over the last 40 years - concludes that the existing infrastructure/utilities is designed to cope with a stable population. Suggests that the GMSF doesn't recognise this.
- Lack of supporting infrastructure and new infrastructure needs to be put in place prior to development.
- Concerns about drainage/sewerage - United Utilities should be further consulted.
- Electricity supply is already overstretched and sewage treatment works are already working to capacity.
- Criteria 10 of the site specific policy should recognise that some required infrastructure and facilities may be provided on site and that the wording of the policy should be amended to allow the contribution to, or provision of, the necessary infrastructure and facilities.
- Current capacity of local systems is unknown at the stage although any application will be informed by an appropriate utilities assessment to fully understand future requirements, capacity and connection points.

#### **Social Infrastructure**

- Highlights the existing strain on schools, community facilities, health infrastructure and there has been no consideration of how they cope with the influx of new residents and there are no plans for new facilities or services.
- Parents already have to send their children outside of the borough because of a lack of school places.
- There is a lack of post 16 year old's provision and youth services in Hyde.
- Careful consideration must be given to school places — including a likely new primary school being built.
- The Garden Village will contain two village centres providing a community with services, facilities and infrastructure.
- Welcomes the recognition given to the need to provide contributions toward education infrastructure through the policy.

### **Environmental – Green Infrastructure, Biodiversity, open space**

- Highlights existing land use as agricultural the development of which will mean loss of agricultural land, food production and jobs.
- The area contains ecosystems recognised as being of environmental importance and includes a wide variety of species including: Great Crested Newts, bats, deer, foxes, rabbits, hedgehogs, hare's, along with numerous species of wild birds, invertebrates and insects (1200 species identified, 60 of these are protected).
- The proposal cannot claim to protect the environment as it would lead to the loss of SBIs, Ancient Woodland and protected trees and destruction of a wildlife corridor whilst creating a monotonous landscape. The areas of Ancient Woodland and other environmentally protected assets should be retained and protected.
- Although biodiversity net gain was a concept little understood and received with scepticism given the proposed loss of green space. There is support for the enhancement of Green Infrastructure, Deciduous Woodland Ancient & Semi-Natural Woodland, Priority Ponds and Protected Species and retention of the existing Deciduous Woodland Priority Habitat alongside recognising the presence and sensitive nature of Ancient and Semi-Natural Woodland at Brookfold Wood and Priority Ponds within the site boundary.
- Developing the area would lose the valued, accessible, public open spaces that contribute towards wellbeing and are used by residents and visitors for walking, running, cycling and horse riding.
- The proposed residential development will spoil landscape character and views.
- Godley Green provides an important wildlife and recreational link between other green spaces - Goyt/Etherow valleys, Peak Forest Canal, TPT, Idle Hill and Werneth Low.
- The whole site should be enhanced with new hedges and trees.
- Don't allow the properties to encroach to close/overshadow the old Apethorn to Godley Railway Line which is now a linear bridleway/walkway and wild life corridor and joins with the two woodlands.
- The proposed allocation is the only area that offers the opportunity for children, from low income families, to have contact with nature and get fresh air.
- The green infrastructure map published does not include Godley Green and should be updated to reflect the current contribution the site makes.
- Request that an appropriate ecological assessment be undertaken
- Woodland Trust object to the inclusion of areas of ancient woodland within sites such as Godley Green which is allocated for development as their inclusion is likely to cause damage and or loss to areas of ancient woodland within or adjacent to boundaries. To do so is considered unsound and Godley Green should not be taken forward.
- Effort should be made to identify potentially unmapped ancient woodland affected by site allocations.
- Highlights that the proposed 32% green space would not be accessible as it is undevelopable land and that valuable green space would be lost.
- Support 2019 Draft GMSF Policy GM-A43 - Garden Village principles, sustainable development and enhancing and protecting open space.
- Project ecologists have been appointed to undertake a comprehensive series of surveys to identify the ecological potential of the site.
- The site masterplan has been developed and designed to retain known or potential habitats and species of conservation interest as far as practical.
- Natural England's agricultural land classification map for the North West identifies that the site comprises grade 4 agricultural land and as such is of a poor quality. Loss of the agricultural land is not considered to impact the suitability of the site for development.

- As the site is largely undeveloped, the risk of contamination is considered to be low, an environmental assessment will be undertaken to confirm this.
- The site is known to contain a historic inert landfill and work is ongoing to identify a suitable remediation strategy. Risk from contamination is generally considered to be low to moderate and mitigation measures will be explored through the planning application process.
- Intends to provide a generous proportions of public open space within ten minute walk times of both proposed and existing residential areas.
- Intends that development will form a positive relationship and integrate with the landscape in a complementary manner.
- Intends there will be a new network of high quality and diverse public spaces, linked by the existing landscape and a safe network of cycle ways and public footpaths.

#### **Air Quality**

- Air pollution is a significant issue and linked to poor respiratory health, this would be exacerbated by additional development and the traffic generated.
- Air quality will be worse for the children at Alder, Holy Trinity, Dowson and all other schools on the A560 and A57.
- Highlights that rainwater testing has shown high levels of acidity and that further testing has shown that the levels are increasing.
- Tameside and Glossop have a high death rate for heart disease caused by vehicle pollution; reducing pollution should be a priority alongside planting woodlands.
- The proposal, given the longevity of its physical development, will conflict with the aim of providing a healthy community and minimising negative health impacts because of the additional pollution and stress it will cause.

#### **Flood risk**

- There is already flooding in the area and ground is generally waterlogged with a high water table.
- The land has many 'issues' which along with excessive run off water would present a significant risk to lower lying properties in Hyde.
- The importance of the area for absorbing rainfall, drainage and preventing flooding was highlighted – this would be lost if the area was developed.
- Werneth Low is an upland habitat and the source of a large amount of rainwater runoff - the drainage system is already unable to cope with heavy rainfall.
- Highlights drainage and flood management issues and it is unclear how the proposed SuDS will be implemented.
- Environment Agency flood risk map indicates that the site is located entirely within flood zone 1, denoting a very low probability of flooding from rivers and seas. Small areas of the site are at high, medium and low risk from surface water flooding. Therefore it is not considered that flood risk is a constraint to the development of the site.
- Environment Agency mapping of possible reservoir failure risk shows the site to be outside flood extents.
- At the application stage the proposal will be supported by an appropriate flood risk assessment and drainage strategy.

#### **Other**

- Disagrees with a growth based approach that does not equally take into account the quality of life of existing residents and wider environmental concerns.
- Timescales seem laudable - long term ambition, but there are negative consequences: such as the over-inflation of figures to allow for increased flexibility.
- The proposal does not meet the national criteria for Garden Village, which explicitly highlights a continued protection of the Green Belt.

- There is no recognition of the established horse riding community within the area and where they will be displaced too. The development would mean less stabling in the area and restricted opportunities for horse riding.
- The village of Gee Cross would cease to exist along with a lot of local history.
- The allocation contradicts the policy objects contained within the spatial framework and does not meet its stated intentions/aims.
- The need for town centre regeneration was highlighted, specifically in relation to Hyde, which is generally seen as a declining, run-down ghost town that has lacked long-term investment.
- Noise, anti-social behaviour and crime issues existing may be exacerbated and police and emergency services are already stretched.
- Quietness and views would be affected.
- Land with existing planning permissions should be developed first.
- There is insufficient information at this stage to see how the site will deliver on the claims of being sustainable.
- The area is well sought after because of its green semi-rural characteristics.
- No evidence provided that local authorities have acted in-line with the 'duty to cooperate'.
- There would be an impact upon Hyde and Hatterlsey in terms of affect upon sense of place.
- Town centre regeneration should be encouraged by providing free car parking, incentivising investment in vacant and dormant property.
- Garden Villages are expected to be locally led, but the approach from the Council has been not to actively consult with local residents and there has been no early engagement with the community.
- Consultation process lacked transparency and local community involvement in a proactive way and the process has been landowner and developer led.
- Public consultation had not been publicised enough, there were a lack of site notices and consultation events were held at inconvenient times.
- Public consultation is not long enough to fully consider impact of proposed allocations.
- If it is to go ahead it should be fully-eco development.
- It must be clearly explained to the public that a development like this is ambitious and will take more time to develop than traditional developer led estates.
- Highlights the importance of providing local services, retail, leisure and entertainment facilities and it is false to assume that the proposed village will be self-contained in providing these needs.
- There are large areas of mine working within the site - this presents a risk.
- Suggest that the agenda is developer driven and that they are profit driven and have a preference for green field sites.
- The site is undervalued for its current contribution to leisure and tourism and for its role in social and physical wellbeing. The proposal will reduce the opportunities for people to be connected with nature.
- Contends that the policy wording relating to the sensitive design of the proposal around existing dwellings is inappropriate. There has been little or no effort to communicate with residents and a complete lack of empathy and therefore the policy wording sounds hollow.
- Particularly supported if Garden Village principles are fully implemented.
- Support 2019 Draft GMSF - agree with the principle of a strategic plan for Greater Manchester and individual boroughs.
- A sensible proposal that should work as long as all the points in the proposal are implemented and sufficient and appropriate shops are available on site.
- A number of landowners who collectively own the majority of land within the allocation have signed a memorandum of understanding.

- It is considered that the site can be viably developed and there is sufficient headroom in the development to generate a developer profit and sufficient value to incentivise the landowners to promote their land. The site also benefits from Housing Infrastructure Funding which means Godley Green has undergone financial review by Homes England resulting in a positive outcome.

### **Response to Comments**

The case for exceptional circumstances are set out for the Green Belt as a whole and the specific case for this site within accompanying topic paper.

The policy identifies potential to deliver around 2,350 new homes, higher densities of residential development around Hattersley station and the two village hubs, and be across a range of types and tenures in accordance with the most up to date assessment of housing need. Moreover policy GM-H 2 covers the concept of the affordability of new housing.

The site does not set the housing target, nor consider the spatial distribution of development. Policies need to be read across the plan as a whole. Land supply is set out within the accompanying topic paper, available via Mapping GM and the Council will continue to review and update its Brownfield Land Register.

The development of a masterplan, phasing strategy and design code through engagement with the local community, Council and other appropriate stakeholders is required. In addition the character of and interface between, new and existing development, including the setting of heritage assets and surrounding residential dwellings and gardens, particularly those within the site, are required to be sensitively designed and acknowledged by development proposals. An Historic Environment Assessment of the site has been undertaken and the Policy requires an assessment of archaeology.

Policy identifies potential to deliver development that is energy efficient and resilient to climate change using zero carbon and energy positive technology. Moreover policy GM-S 2 covers the concept of carbon and energy.

Employment, education and training opportunities are required to be available for residents within the local area. The Policy requires appropriate contributions toward education, health and other infrastructure and setting aside of land unless not required. Policy also sets out delivery of flexible workspace and fibre to the premises to support home working. Policy requires an integrated and co-ordinated approach to infrastructure to support the scale of the whole development including for utilities provision.

Policy requires the provision of developer contributions toward transport infrastructure as deemed appropriate and a Locality Assessment has been undertaken to assess impact on highway infrastructure and set out mitigation options. Moreover, policy GM-S 6 covers the concept of clean air. Policy identifies the need for highways to accommodate bus routing and provision of services within early development phases whilst also identifying a multi user bridge to connect to Hattersley to enable train station access. GM Transport Strategy Delivery Plan identifies options to deliver metro/tram-train service on the Glossop line.

Policy recognises the need to protect and enhance key landscape and ecological features including trees and woodlands, including ancient woodland, other mature trees and hedgerows, cloughs, watercourses, ponds and Sites of Biological Importance and a Preliminary Ecological Appraisal has been undertaken. Moreover policy GM-G 9 covers the concept of net enhancements for biodiversity and geodiversity. Public rights of way,

the Trans Pennine Trail, sustainable travel routes, enhancement of connectivity and the setting aside land for a range of public open spaces are also identified within the policy.

A level two Strategic Flood Risk Assessment has been undertaken across the plan and policy identifies that a site wide drainage strategy will be needed, incorporating sustainable urban drainage systems. Moreover Policy GM-S 5 covers the concept of flood risk and the water environment.

A viability assessment has been undertaken and the site shown to be viable.

**GM Allocation 44: South of Hyde (1,807 comments)**

The majority of objections were concerned with three key themes: Green Belt loss; transport issues; and the provision of social infrastructure.

The principle of Green Belt loss was objected to for a wide range of reasons, including its role in preventing urban sprawl and preventing the coalescence of settlements through to its perceived value as a wildlife habitat and area for recreation. Transport issues included existing highway congestion around Hyde and the A560/M60/M67; inadequate and poor quality public transport, inadequate and poor quality walking and cycling infrastructure. This issue of increased congestion was generally linked to a worsening of the already existing problem of air pollution and this was generally further linked to having a negative impact on respiratory health. Social infrastructure (education and health) was an area of great concern, with many respondents highlighting the inadequacies and shortages in the current level of provision. Across the board there was a general theme that a broad range of infrastructure improvements needed to take place before any additional development was carried out. Other key themes that emerged from the responses were: the failure to identify and prioritise brownfield development (with numerous sites given as example); the focus on the Hyde area for new housing development; the perception that the amount of housing identified in the plan for Tameside significantly exceeded the amount required during the plan period (2,790 units vs 1,542); the negative impact on wildlife and habitat that the proposal would have; and having a focus on town centre residential led regeneration

<b>Principle / scale of development</b>
<ul style="list-style-type: none"> <li>• A disproportionate level of growth focused on Gee Cross.</li> <li>• Smaller development sites distributed across the region to ease the burden on the Green Belt.</li> <li>• Argument for the removal of the site because Godley Green is sufficient alone to meet housing need.</li> <li>• The site on its own cannot address the shortfall in housing supply in the early plan period therefore other small sites are needed.</li> <li>• The site selection process is not clear or transparent and underlines a potential major challenge to this policy.</li> <li>• Support for planned development with well thought out infrastructure as opposed to ad hoc small developments.</li> <li>• The site boundary is well defined by natural features and provides a natural and effective boundary between development and countryside.</li> <li>• Boundary amendment requested with the inclusion of the land at Hilda Road - this provides site access to the A560 from Bowlacre.</li> </ul>
<b>Housing (inc affordable housing)</b>
<ul style="list-style-type: none"> <li>• General acknowledgement that there is a need for new housing, but development of the Green Belt was not supported.</li> <li>• Many quotes of government ministers on local housing need and targets highlighting Green Belt as a constraint.</li> <li>• Claimed the housing numbers are unjustified and overestimated and submitted alternatives to the requirement, concluding that the housing target is too high, based on out of date ONS data and does not take into account the EU referendum and the effects of Brexit and therefore the proposal should be deleted.</li> <li>• Asks why sites identified in the 2016 housing land baseline have been removed.</li> <li>• Tameside, unlike Stockport Council, has failed to persuade neighbouring districts to take any of GMs housing need.</li> </ul>

- Several alternatives to housing delivery were proposed, such as using a high density village model or housing schemes which challenge social norms and produce a more socially, environmentally and economically just society.
- Over 4,000 properties were identified on rightmove.com as available within five miles of Hyde – indicates that there is no demand for new housing with many properties taking months or years to sell. There is more demand in Romiley where house prices are 40% higher than Hyde.
- Ashton and Stalybridge would be better for residential development as they are to benefit from strategic transport interventions.
- Many comments objecting to or concerned about the type of housing proposed, specifically objecting to larger ‘Executive Homes’, the lack of affordable housing and the shortage of good quality family houses in Hyde.
- Questions what ‘affordable’ housing means in relation to average borough wages.
- Highlights the issue around the ageing demographic and providing housing types to meet that need.
- Development will completely transform the area and destroy its countryside qualities. Also sceptical that innovative, high quality, sustainable and affordable housing will be delivered.
- The proposal will lead to overlooking of existing dwellings and devalue existing property
- Housing will lead to urban sprawl and is supported by a manipulative IA.
- Ample housing exists in Gee Cross - additional housing would cause more pollution, congestion and provide houses not affordable to many local people.
- Topography of the land is impractical for development of housing.
- The site is suitable, deliverable and available with no constraints, good transport links and access to the countryside. It could be delivered early in the plan period to support the five year housing land supply.
- Will provide much needed housing that will allow upgrading or downsizing within the area thus freeing up of lower cost housing this providing continuity and supporting a diverse stronger community and boost the local economy.
- As one of the largest independent estate agents in the area, we believe that there would be a good demand for quality family housing in this part of Hyde. We feel that this allocation could help meet this in the near term and for this reason feel the allocation would be positive for Hyde, provided appropriate measures are taken to mitigate any impact the development may have on the surrounding area.
- Support for Garden Village principles through building and developing a well thought out scheme, a variety of types and tenures, enhancing and protecting open spaces whilst building a sustainable development that incorporates energy efficiency measures and eco-homes.
- Support the reduction in the number of new houses to be built with most of the new ones proposed to be built on brownfield land.
- Many first time buyers would benefit from high/midi housing with good transport links.
- Very keen to see this allocation supported as for so long now there has been a shortage of houses in Tameside that stops people moving out of the borough.

**Employment and Economy**

- Lack of employment and specifically local job opportunities and these people are likely to commute into Manchester, Salford, Stockport and Ashton.

**Green Belt and Green Belt Additions**

- Successive Governments and Ministers have vowed to make the continued to protect Green Belt a priority.
- The proposal conflicts with National Planning Policy Framework Green Belt policy and objectives and the draft plan fails to provide a rational argument to support the release



<p>of Green Belt in order to meet housing targets, there are no exceptional circumstances presented and it should be considered as a fundamental constraint.</p> <ul style="list-style-type: none"> <li>• Change in designation is driven by developer demand and not an actual need for the housing. An understanding of the implications of developing Green Belt is needed before decisions that might later be found to be environmentally, socially and culturally detrimental, are made.</li> <li>• Sceptical about the creation of new defensible boundaries as future schemes will further alter the boundary.</li> <li>• This proposed development, to help address the housing crisis, is misguided - the Green Belt is required to maintain the population's mental health and to encourage physical activity and recreation by local residents.</li> <li>• Suggests that there is limited reference to affordable housing and that it is used as an excuse to develop on Green Belt.</li> <li>• Suggests the additions do not qualify as Green Belt and are merely to mask the loss and some would make better housing sites. Highlights that the proposed additions have a lower environmental and recreational value than the allocation and that the proposed allocation has not been assessed for their quality contribution to biodiversity and geodiversity and that this suggests a lack of familiarity and understanding of the spatial character of the site.</li> <li>• Concern expressed by United Utilities over the proposed additional Green Belt that includes the existing operational facility at Godley. Green Belt policy would need to be supportive of the need to expand facilities and there is concern expressed that a Green Belt boundary that includes the identified facilities could potentially bring greater restrictions on future development. United Utilities would therefore prefer that the Godley facility stayed outside of the Green Belt.</li> <li>• Welcomes the decision to remove the Green Belt allocation at Mottram and may be pleased to see additions to the Green Belt.</li> </ul>
<p><b>Brownfield</b></p> <ul style="list-style-type: none"> <li>• Redevelopment of brownfield sites, empty/derelict properties and use of CPO powers and increasing Council Tax on vacant properties, were identified as alternatives to developing the Green Belt.</li> <li>• Redevelopment of brownfield sites should be fully exhausted before development of Green Belt takes place as brownfield sites are generally located close to existing facilities, services, transport and infrastructure and provide ideal opportunities for affordable housing at a higher density.</li> <li>• GMCA and/or Government funding should be used to support this regeneration.</li> <li>• Releasing land for this contradicts the brownfield preference approach set out in the GMSF.</li> <li>• The need for an up-to-date and comprehensive Brownfield Land Register was highlighted as thousands of homes could be delivered on brownfield sites.</li> <li>• The number of homes identified on allocation GM-A 44 could easily be accommodated from the existing supply of brownfield and green field sites.</li> <li>• Brownfield development would also negatively impact on traffic congestion and local services and require economic viability testing.</li> <li>• Developers prefer green field sites to brownfield as they are cheaper to develop and are more profitable.</li> <li>• There are insufficient brownfield sites available to fulfil the housing requirements in Tameside.</li> </ul>
<p><b>Transport – Highways / Public Transport / Cycling / Walking</b></p> <ul style="list-style-type: none"> <li>• Strategic transport plans are restricted, with only one committed scheme included (Mottram Bypass) and do not support the existing level of development or the proposed growth across the area and beyond. Therefore, new infrastructure is required before any further development takes place.</li> </ul>

- Proposal will not achieve a reduction in the need to travel in order to tackle greenhouse gas emissions and promote sustainability.
- Highway congestion is prevalent right through the week in the area and has been compounded by recent development. If the site is developed then better pedestrian facilities, including a crossing, should be provided on the A560.
- Road safety is an increasing issue for all road users with increased levels of traffic will make it more difficult for horse riders to cross Stockport Road.
- Narrow main roads and existing rail bridges are highway constraints which cannot easily be resolved.
- Highways England - The scale of allocation is likely to give rise to traffic at both an individual and cumulative level at the SRN due to its proximity to the M67 and likelihood of accessing the wider motorway network at M60 Junction 24 / M67 Junction 1 and M67 J3 and J4.
- Although no details of access/egress have been provided to date the site promoter advised that direct vehicular access will be provided onto the A560 Stockport Road and highway consultants engaged by the promoter have determined that there will be limited impact on the traffic flow and little or no impact on the minor highway network.
- All existing forms of public transport are currently considered to be unreliable, inadequate or absent. Development will degrade the local environment and add pressure to the existing failing transport system. Therefore the proposals will not be acceptable unless it is expanded and improved (including Metrolink), the travel costs reduced and elderly and disabled users are catered for.
- What improvements in transport links are planned and funded by developers?
- Public rights of way, including the ancient Cown Edge Way, must be protected and development of the site should support upgrades to the wider PROW network, including the Trans-Pennine Trail. There should be greater dialogue with stakeholders to ensure that opportunities for enhancing the network are fully explored.
- Network Rail have identified a number of opportunities at Woodley Station, including transforming land uses, reviewing the potential rail capacity uplift and the potential for tram/train on this rail corridor.
- Concern remains that rail improvements alone would not address the travel needs of many people.
- Pedestrian and cycle lane improvements are a good idea, but major investment is needed as the areas current infrastructure is seen as extremely poor quality.
- Walking and cycling are also both impacted on by air pollution.
- Convincing people to give up car use was seen as very challenging given the poor alternatives available.
- Supports development with well thought out infrastructure rather than small developments with poor infrastructure, clogging up the smaller minor roads.
- Sites are close/alongside all existing regular bus service to Stockport and Ashton, within a short walk to Woodley train station, adjacent to National Cycle Route 62, and cycle and pedestrian infrastructure will be introduced or improved.
- Highlights that new development has always been delivered as the population has grown, but also notes that congestion will continue as long as people drive to work one person in each car during the rush hour.

#### **Physical Infrastructure and utilities**

- There are electricity, water and waste water capacity issues and no budget in place for improvements.
- Burst water mains and problems with the water supply are an issue locally.
- With the increased number of homes, roads will have to be dug up to provide power, internet & sewage systems leading to delays on the road network - this will have a knock effect on to existing business.

- The policy wording for Policy GMA 44 South of Hyde is highlighted as a good example.

### **Social Infrastructure**

- No plans to build social infrastructure – schools, doctor’s surgery’s, hospitals, dentists, police etc. Investment is required before any development takes place.
- Proposals will not increase services to an acceptable level.
- Lack of quality schools in the area and no capacity for the additional pupils from new development - Schools are full and oversubscribed with some parents sending their children to schools in Stockport as they are unable to attain local places.
- Additional pupil growth in the Hyde area would cost £50m. This is greater than the annual budget available and fails to take into account the additional infrastructure required for transport, health etc.
- There is a lack of GP capacity in the area, waiting times at Tameside hospital are terrible and because of the stretched local health service some people have to attend GPs outside of the borough.
- Local and national shortage of GP's and other health professionals and budgetary constraints on the NHS.
- The increased longevity of the population is leading to an even greater demand for services and there is a lack of older persons care.
- Police cuts have been significant and concerned about increasing crime rates and anti-social behaviour.
- Services for children and youths are limited and there is pressure on private clubs and local groups such as Brownies, Beavers, sports clubs etc.
- The local library is now very small and local play space is very poor.
- DfE welcome the recognition given to the need to provide new schools as part of various allocations and for developer contributions towards the provision of education facilities in GM-A44.
- Site promoters highlighted that the proposal will make appropriate contributions for any local services and infrastructure needed to make the development acceptable in planning terms.

### **Environmental – Green Infrastructure, Biodiversity, open space**

- A wide range of habitats, flora and fauna would be lost as a result of the proposal.
- Important area that links into the wider ecosystem – specifically with reference to pastureland, ancient woodland and the local SBI and Local Nature Reserve.
- Although biodiversity net gain was a concept little understood and received with scepticism given the proposed loss of green space. There is support for the enhancement of Pole Bank SBI and retention of the existing woodland alongside recognising the presence and sensitive nature of Ancient and Semi-Natural Woodland to the south west of the site.
- Ecological assessments essential, should involve local residents and be carried out over a year and covering 24hrs a day.
- The proposals contradict Chapter 8 'A Greener Greater Manchester'.
- The area provides the only green open space and walking routes to the east of the A560 between Hyde and Stockport and is an important green corridor separating Hyde and Gee Cross from Woodley, this joins the Werneth Low country park to the Haughton Dale nature reserve and on to Tame Valley and Reddish Vale nature reserves - significant natural beauty (and historic interest).
- The fields are used for recreation activities and by school study groups. It allows access to Werneth Low and further afield, such as the Peak Forest Canal and River Tame.
- Building on Green Belt will contribute to the wider mental health crisis. Green space is needed for the physical and mental health and wellbeing of the population, including social prescribing and for walking therapy.

- Area is utilised by tourists traversing the Trans-Pennine Trail, adding to the local economy. Building right up to Werneth Low would compromise one of the few tourist attractions in Tameside.
- There is hardly anywhere left for families to spend time outdoors and children to play out and not all people have cars which enable travel to the countryside.
- Loss of green space potentially encourages car journeys and adds pressure to currently overcrowded areas.
- Creating new recreation areas, cycle paths and walking areas will not compensate for building on Green Belt land.
- The Council is promoting an 'Active Tameside' but this cannot be achieved for free when the land used for exercise is proposed for development.
- Highlights the importance of green spaces as stated by the WHO - fundamental component of any urban ecosystem with a multifunctional role.
- Suggests that the master planning exercise should also include green infrastructure in this phasing strategy please as is proposed for the Stockport sites.
- Construction of more housing will lead to pressure for road building, including the M60/A6 relief road - this will lead to the destruction of valuable green space.
- Green space is also a necessity for horse owners and there is an existing lack of options for owners in the area.
- Street trees - sound awful compared to woodland.
- Development will ruin the landscape and lead to a loss of identity, character, views/vistas and the semi-rural characteristics of the Gee Cross area. This adverse impact cannot be suitably mitigated.
- The site is already within an urbanised setting.
- New trees and hedges should be considered to mitigate the visual impact.
- Site promoter highlights the design led masterplanned approach that will not lead to Green Belt coalescence and is sensitive to existing development and landscape feature. New amenity and play areas will be provided.
- The response highlights the proposed delivery of greenspace, recreation space and a walking and cycling network linked into the countryside and existing recreation routes.

#### **Air Quality**

- Extensive parts of the local highway network exceed air quality limits (identified on mappinggm.org.uk).
- Proposed development will generate both extra traffic and domestic emissions that contribute to air pollution. This is contrary to the Council's pledge for better air quality and is contradictory to the aims of the GMAQAP.
- Link between air pollution and asthma and other respiratory conditions.
- The site currently acts a buffer for traffic pollution and it would be more use if it were planted with trees to combat carbon emissions.

#### **Flood risk**

- The importance of the area for absorbing rainfall, drainage and preventing flooding was highlighted – this would be lost if the area was developed.
- Increased likelihood of flooding due to climate change.
- There is existing drainage and flooding issues and specific geological issues relating to drainage were highlighted including the barrier formed by the canal.
- Stockport's Local Flood Risk Management Strategy identifies the site as being within an area with a high chance of surface water flooding and that the site plays an important role in controlling the run-off rate of rainwater from Werneth Low to the Tame Valley. It also identifies surface water run-off and groundwater as the two main sources of increased flooding. The response suggests that the two areas are linked by their shared boundary with Werneth Low and that any new properties developed will be at risk of flooding.

- Tameside MBC's Strategic Flood Risk Assessment 2011 highlighted and the role of Green Belt area in flood storage. Current flood risk: the A560 both at the Joshua Bradley and the junction at Apethorn Lane.
- A detailed drainage assessment of the site is needed.
- Potential impact on water quality in the River Tame from development.
- The Environment Agency is involved with the GMCA to identify what additional work will need to be undertaken as part of the Level 2 SFRA - as a result this site may require further analysis.
- Site promoter - the proposal will incorporate SUDs principles.

### **Heritage**

- The Grade II\* listed Apethorn Farm, Apethorn Lane and early mill buildings are historically significant. Development would destroy this character and would not conserve and enhance the historic environment and heritage assets, i.e. Apethorn Farm would be surrounded by suburban housing - highlights National Planning Policy Framework para 219.
- The proposal would see the strong character and history of these North Cheshire towns merged into a single built environment.
- Historic England objects to the allocation - not satisfied that the proposal for the site allocation for enabling development is in accordance with the requirements of the National Planning Policy Framework. Therefore, in view of this this site should be deleted from the GMSF
- Objects to development in close proximity to Apethorn Farm and the removal of the wording around enabling development that was included in the 2016 GMSF. Suggest that this was used as a false premise to allow the site to be identified for development. Concludes that it is essential that the building is renovated, but not at the expense of the extensive proposed Green Belt development.
- Concerned by the removal of enabling development from the policy wording in relation to Apethorn Farm and the lack of care of the farm over the decades.
- How will the restoration of Apethorn Farm be guaranteed and will it be restored to a working farm?
- Support for the sympathetic restoration of the Grade II\* listed Apethorn Farm which also has the potential to give a village identity.
- Site promoters - development will support full restoration of the Apethorn Farm complex, with the layout designed to respect the setting of the listed building.

### **Other**

- The proposed site allocation does not comply with the National Planning Policy Framework or GMSF policies and although the framework objectives seem sound, this proposed development has significant issues against several of the key objectives.
- A strategic plan is desperately needed to fulfil the housing requirements, if a plan isn't agreed then it leaves developers open to challenge unregulated sites.
- No evidence presented to demonstrate that the detailed discussions and internal consideration have taken place with neighbouring districts.
- Disagrees with objections because they do not give consideration to the growing population.
- Impact on and disruption to local people during the construction phase.
- The sites should in the future be referred to as Gee Cross, but the village and heritage status will be lost because of the additional development.
- Contends that the development of urban sprawl will lead to the creation of slums, social deprivation and degradation whilst increasing costs for health, social care and policing.
- Design a Greater Manchester that is healthier, less congested, and more sustainable.
- Lack of local shops and those that are located in Gee Cross lack parking.

- Tameside residents already suffer from high levels of obesity, heart disease, poor mental health, stress etc.
- Development will only benefit housebuilders and the Council because of the higher Council Tax income.
- Proposal has been compiled by professional people looking at statistics/data in isolation without any real world knowledge of the areas proposed for development.
- Influence on land stability from the coal mining activity, landfill operations and ground conditions - could cause subsidence and put new and existing housing at risk.
- Increased light and noise pollution.
- Has the land banking of supermarkets been investigated?
- Hyde town centre needs investment to support its regeneration and stimulate demand as it is currently of poor quality and this has impacted on business retention, the ability to attract shoppers and the quality of life of local residents.
- No focus on Hyde for job creation or leisure provision means it would be a commuter town, leading to no positive economic impact on the town.
- A town requires balance - good roads, adequate housing of all kinds, a good shopping centre and medical and educational support structures.
- Contradiction in approaches between Manchester's focus on urban regeneration and the proposals to release Green Belt and create sprawl.
- There is a clear case for re-energising the town centres with residential development and including reclassifying empty shops, offices, commercial and other premises and the top end of Market Street for residential use.
- Consultation process lacked local community involvement in a proactive way and the process has been landowner and developer led.
- Public consultation had not been publicised enough, there were a lack of site notices and consultation events were held at inconvenient times.
- Highlights the length of time taken to develop the draft GMSF compared to the duration of the consultation period in which residents can consider the proposals and the evidence.
- Much comment on the transparency of the process, the complexity of the consultation portal, poor quality of the consultation material and the misleading nature of associated material.
- Does not believe that the consultation catered for elderly and non-computer users.
- Development will bring jobs to the area and support local businesses, particularly village shops, pubs and nursery.
- A sensible proposal that should work as long as all the points in the proposal are implemented.
- Supports sustainable development of the local villages and will assist with the overall regeneration of Hyde.
- There is great access to surrounding Country Parks, close to Manchester city and Manchester Airport, and there is good access to transport links.
- Joint landowner agrees with the principle of GMSF with Local Plans to follow.
- Joint landowner highlight that it is important to build on the positive, well established community and provide a healthy environment for future generations.

### **Response to Comments**

The case for exceptional circumstances are set out for the Green Belt as a whole and the specific case for this site within accompanying topic paper.

Policy identifies the potential to deliver around 440 new homes across a range of types and tenures in accordance with the most up to date assessment of housing need. Moreover policy GM-H 2 covers the concept of the affordability of new housing.

The site does not set a housing target, nor consider the spatial distribution of development, policies need to be read across the plan as a whole. Land supply is set out within the accompanying topic paper, available via Mapping GM and the Council will continue to review and update its Brownfield Land Register.

The development of a masterplan, phasing strategy and design code through engagement with the local community, Council and other appropriate stakeholders is required. In addition, the character of and interface between, new and existing development, including the setting of heritage assets and surrounding residential dwellings and gardens, particularly those within the site, are required to be sensitively designed and acknowledged by development proposals. Policy identifies the need to successfully integrate development edges into the adjoining landscape, deliver lower density development as the site rises in elevation, protect key landscape features and take into account the landscape character assessment.

A Historic Environment Assessment has been undertaken and Policy requires an assessment of archaeology is undertaken alongside a heritage impact assessment. Policy also recognises heritage assets and requires the long term future use of the Grade II\* listed Apethorn Farmhouse and complex is secured within an early phase of development together with removal from the Heritage at Risk Register.

Policy requires the provision of developer contributions toward transport infrastructure as appropriate and a Locality Assessment has been undertaken to assess impact on highway infrastructure and set out mitigation options. Non Green Belt land adjacent to Hilda road has now been included to provide site access. Moreover, policy GM-S 6 covers the concept of clean air and the GM Transport Strategy Delivery Plan identifies options to deliver metro/tram-train service on the Marple line. Policy requires an integrated and co-ordinated approach to infrastructure to support the scale of the whole development, including for utilities provision.

Policy recognises the need for developer contributions toward education, health and other infrastructure as appropriate. Setting aside land for a range of public open spaces is also a policy point as is utilising government endorsed building for a Healthy Life standard for well designed homes alongside Sport England and World Health Organisation guidance regarding active design and active lifestyle behaviour.

Policy recognises the need to protect and enhance key landscape and ecological features including trees and woodlands, including ancient woodland, other mature trees and hedgerows, cloughs, watercourses, ponds and Sites of Biological Importance and a Preliminary Ecological Appraisal has been undertaken. Moreover policy GM-G 9 covers the concept of net enhancements for biodiversity and geodiversity. Policy GM-G 9 also recognises that a limited amount of development on agricultural land is necessary, alongside requiring appropriate assessment. Moreover the land promotor has undertaken an up to date agricultural land classification assessment.

Policy recognises the need to ensure neighbourhoods are walkable and safe places, active travel is promoted to be the most attractive form of local transport including public rights of way and the Cown Edge Way, and connectivity is enhanced within the locality, such as to public transport services, Peak Forest Canal, Trans Pennine Trail and Werneth Low Country Park.

A level two Strategic Flood Risk Assessment has been undertaken across the plan and policy identifies that a site wide drainage strategy will be needed, incorporating sustainable urban drainage systems and regard be had to the most recent flood risk

assessment. Moreover Policy GM-S 5 covers the concept of flood risk and the water environment.

A viability Assessment has been undertaken and the site shown to be viable.



**Further comments on the overall proposals for Tameside, including strategic transport interventions (363 comments)**

<p><b>Housing (including affordable housing)</b></p> <ul style="list-style-type: none"> <li>• Delivering housing need should be reassessed on a national level;</li> <li>• Proposed Tameside allocations are incompatible/conflict with Chapter 8 'A Greener GM' in the 2019 Draft GMSF and questions raised over the reduction and discrepancies in Tameside's local housing need, baseline housing land and allocations data within the 2016 (Draft) GMSF and 2019 (Draft) GMSF;</li> <li>• Disagree within the number of new homes proposed as housing land requirement is based on invalid assumptions. The housing target should also be reduced to level where Green Belt is not required and concern that the housing trajectory is unsustainable, will impact on climate change and detrimental to the environment;</li> <li>• Additional new homes will have an impact on the local areas. There is sufficient provision of homes in Tameside to meet local need, that the local planning authority has a sufficient number of extant residential planning permissions to meet need, that there are properties on the market and there is already choice of house types and range in house prices across the area and that the proposed number/size/type of new homes is speculative and unsubstantiated;</li> <li>• Need to provide more, quality social housing with support for improvements to existing stock and the reuse of empty homes/properties, redevelopment of brownfield sites and town centres in the first instance as well as a need to provide higher value housing in order to attract high end earners to the borough, which will in turn support local economy;</li> <li>• Concern that Hyde has already been subject to the recent development of thousands of additional homes and that a disproportionate amount of housing is proposed in Hyde whilst investment is focused in Ashton. Increase in residential development and decline of Hyde town centre and leisure offer will also result in Hyde becoming a dormant/commuter town;</li> <li>• Proposals are unfair and unaffordable to majority of people within the area and building more of the same type of housing is not a long term solution. Type of housing (3, 4 &amp; 5 bed) proposed by the developer are not considered to be 'affordable' for the community; and</li> <li>• A new approach to delivery sustainable residential development is required - small sites with higher densities, tackling climate change with greenspace and key services on site etc. Need to tackle comfort, space standards/ gardens and a new approach to delivery sustainable residential.</li> <li>• Potential to deliver homes for local people</li> <li>• Sustainable residential development - tackle social, environmental and economic issues</li> <li>• Development would allow people to stay within the local area - support stronger community - provide affordable homes</li> <li>• Support for the residential redevelopment of brownfield sites e.g. former industrial/ mill buildings along the canal could be reused for affordable housing</li> <li>• Support for a wide variety of housing types to be delivered across the borough</li> <li>• Proposals which will include a range of house type, size and tenure will attract economically active households to other areas of Tameside. E.g. Droylsden Marina has delivered aspirational new homes with good access to Metrolink.</li> </ul>
<p><b>Employment and Economy</b></p> <ul style="list-style-type: none"> <li>• Tameside's employment allocation is contrary to Chapter 8 'A Greener GM' in the 2019 Draft GMSF;</li> <li>• Funding is required to support existing businesses;</li> </ul>

- The employment land requirement should be reduced as it is based on invalid assumptions; and
- Reduce economic ambitions to a level where Green Belt is not required.
- Increase in the number of jobs and youth training;
- Development would generate jobs and support local businesses (e.g. shops, PH and nurseries); and
- Support for a strategic plan to provide for sustainable economic growth over the next 15-20 years.

**Green Belt (including Green Belt additions)**

- Allocation of Green Belt land is contrary to National Planning Policy Framework Chapter 13 Protecting Green Belt Land. An argument for exceptional circumstances have not been demonstrated, there is a need to protect the countryside from urban sprawl and the purpose of the Green Belt is in line with National Planning Policy Framework para 134 (e.g. prevents Gee Cross and Woodley from merging). The local planning authority has a duty to protect Green Belt and agricultural land;
- Development of Green Belt for new homes will lead to the loss of vital greenspace, will have detrimental impact on environment, wildlife and biodiversity including the loss of ancient fields and woodland; reduce air quality and climate resilience and prevent free movement of people/ walking as alternative mode of travel to the car/ public transport;
- Object to the loss (including no net loss) of Green Belt land across Hyde, Tameside and Greater Manchester to development;
- Green Belt land is an asset, should not be developed and should be preserved for prosperity and for the communities enjoyment, amenity, recreational value, health and wellbeing;
- Concern that too much Green Belt land has been identified for development and that development of Green Belt sites would set a future precedent and concern that Green Belt land will be developed in first instance and that brownfield sites will remain undeveloped. Green Belt sites are out of the way and would require cars to access sites;
- Object to the loss of Green Belt, however if there is no alternative development must be accompanied by excellent public transport links to Manchester City Centre, Manchester Airport and strategic employment, healthcare, retail and leisure sites.
- Disagree with ONS figures used in the Standard methodology for calculating local housing need using the 2014 ONS data would result in a reduction of local housing need and therefore developments on Green Belt will not be required.
- Alternative sites are available and development of Green Belt should be a last resort and only considered after all brownfield sites have been exhausted; and
- Reducing the GMSF plan period to 15 years would mean no need to develop Green Belt.
- 1982 Greater Manchester Green Belt plan no longer serve the Green Belt purposes set out in paragraph 134 of National Planning Policy Framework -
- GMSF must address those issues/ make explicit in line with para 136 of National Planning Policy Framework that non-strategic plans should be allowed to be changed e.g. local plans and neighbourhood plans
- Proposed Green Belt additions (woodland, playing fields and land adjacent to motorway) unlikely to be developed anyway;
- Support 2019 Draft GMSF Green Belt addition p. 423 land at Demesne Drive, Copley, Stalybridge;
- Support 2019 Draft GMSF Green Belt addition p. 425 land at Hyde Road Mottram, Mottram as it supports a variety of wildlife and habitats and provides an important local amenity and recreational space and plays positive role in improving health and wellbeing and as the area is already heavily congested;

- Support for the removal of Allocation 28.8.26 OA26 Mottram M67 North and South (2016 Draft GMSF) from the 2019 Draft GMSF - do not support additional development within the area due to increase in traffic, road safety and fumes;
- Support removal of Allocation 28.8.24 OA24 Sidebottom Fold, Stalybridge (2016 Draft GMSF) from the 2019 Draft GMSF and for the sites retention in the Green Belt (removal would have negative implications for biodiversity, lack of infrastructure, traffic congestion, air quality/AQMA, flood risk etc.). Land between residential development and moorland will create buffer in case of future moorland fires. Existing infrastructure would not be able to support the level of development and resultant increase traffic congestion, air pollution and flood risk proposed under Allocation 28.8.24 OA24 in the 2016 (Draft) GMSF;
- Support 2019 Draft GMSF, page 433 reallocation of protected green space to Green Belt addition at Yew Tree Lane, Dukinfield, Tameside. However acknowledge that application 18/00259/FUL has subsequently been minded to approve by local planning authority; and
- Support for the reopening of the passenger rail line between Stalybridge - Stockport as this would give access to employment opportunities

### **Brownfield**

- GMSF allocations are not in line with Mayor's brownfield land first approach. A Review of GMSF should have an emphasis on the redevelopment of brownfield sites; and the need for a phasing strategy to deliver remaining brownfield sites;
- Brownfield sites have not been considered, assessed and/or prioritised; and not all locally available brownfield land have been identified on the Brownfield Land Register and/or within the baseline housing land supply as an alternative to Green Belt sites
- A brownfield first approach to the development of new homes (including affordable) and employment land should be a priority over the development of greenfield/ Green Belt sites; with support for the reuse and or/ CPO of brownfield sites including vacant/derelict employment land, buildings, mill buildings, commercial premises and utilisation of town centres in order to meet local housing/affordable housing and employment need;
- Brownfield sites should be identified as a priority particularly those close to amenities and public transport as they would not lead to a loss of green infrastructure and biodiversity;
- Development of Green Belt/ site allocations is unnecessary as there are sufficient brownfield sites in Tameside to meet local need; with call for new homes and employment land to be confined to existing suitable brownfield sites within the urban area; and for the equal distribution of the development of brownfield sites across the borough and not focused in one area;
- Questioning the profitability of redevelopment of brownfield sites and concern that brownfield sites have not been considered as part of the GMSF as developers do not like them; and
- Acknowledgment that there are not enough brownfield sites to meet Tameside's local housing need.
- Support for the redevelopment of brownfield sites including those in Stalybridge and Hyde Town Centre and support for the sale of Council owned land for residential redevelopment; and
- Support the residential redevelopment of brownfield land in Tameside to meet housing requirement up to 2037 identified in the 2019 Draft GMSF.

### **Transport (including Highways, Public Transport, Cycling, Walking)**

- Existing transport infrastructure in Tameside, including roads, motorways, rail, Metrolink, walking, cycling and public transport is insufficient to serve needs of existing population with issues, such as traffic, congestion and pollution, exacerbated by proposed development, increasing inequalities, impacting on the economy,

damaging local residents' prospects for prosperity and impacting on the sustainable movement of people and services.

- No clear strategy in place. Proposed traffic mitigation measures will not be sufficient to prevent increase in car usage. Tameside should revise their Active Travel Plan to encourage more people to use alternative modes of transport to the car;
- Sceptical that the transport infrastructure outlined in Policy Allocations will be able to support proposed development and increase in the population; additional transport improvements are required between Ashton - Stockport and Hyde – Glossop. Objection to 2019 Draft GMSF Question 70 and 73, inclusion of Mottram Moor A57T - A57 link road and the Hollingworth - Tintwistle interventions;
- Strategic transport interventions must be in place prior to the development of new homes. Any gains will be negated by increase in traffic (e.g. M60 Smart Motorway, North-South Rapid transport corridor and Quality Bus Transit). Support for controlled development with planned infrastructure to support level of proposed development rather than small developments which are unable to do this and increase traffic on minor roads;
- Majority of new housing is proposed in Hyde despite investment including improvements to transport infrastructure and access into Manchester being focused in Ashton. Market Street, Hyde is unable to support existing level of traffic, no train service from Gee Cross and no Metrolink service from Hyde. Transport in Hyde needs further investment when compared to other parts of GM. Existing transport infrastructure 'this side of Tameside' over its capacity making it difficult to get to GP surgeries and local supermarket;
- Utilise existing strategic transport infrastructure. Strategic transport interventions focused in Ashton and Stalybridge making this part of the borough a more accessible location for development as opposed to Hyde;
- Tameside and Stockport need to jointly assess the traffic implications on the A6017 which may arise through the development of Allocation 44 South of Tameside and Allocation 34 Bredbury Park Extension;
- Existing roads are in poor condition, busy, congested during peak hours and unable to cope with the current volume of traffic and therefore be unable to support additional development. Traffic congestion between M67 and M60 during peak hours. Concern that funding/investments into highways/relief road improvements have been focuses within south and west of Manchester;
- Improvement are required to local roads including pedestrian crossing points on 40mph roads;
- Concern regarding existing congestion and volume of traffic along on A6017 (Denton to Bredbury) and A560 (Gee Cross to Bedbury) and the potential increase in this as a result of the proposed development;
- Support for the construction of the Mottram - Tintwistle bypass and Bredbury - Hazel Grove bypass, whilst the fact that the Mottram bypass has not been built has also been noted;
- Support for electrical vehicular charging points and buses;
- Increase in the number of new homes will require improvements to train services, including extra carriages to meet demand/overcrowding, help for disabled passengers, and peak hour improvements at Hattersley, increasing frequency of service on a Sunday and increase parking spaces to stations in Hyde. Services at Denton station ignored with only 1 passenger service a week;
- Rail link between to Manchester via Hadfield is an excellent service;
- Support for the proposed Droylsden station identified in 2016 Draft GMSF 28.4.1 EG1 Little Moss/Ashton Moss and for the proposed new rail station at Gamsley as a priority with access to both sides of track to limit commuters from Simmondley using A57 to access station and for the development of the Metro tram/train service on the Glossop - Manchester rail line;

- Improvements to bus services are required in order to attract more people to use public transport e.g. live digital passenger information displays/bus trackers; although costs associated with the redevelopment of Ashton bus station are highlighted as is the reduced night bus service to Hattersley;
- All routes to neighbouring towns go through Ashton - increase journey time/ congestion on bus routes;
- Metrolink is safe and reliable for commuters into Manchester City Centre;
- Support for an extension of Metrolink services across the borough to reduce traffic congestion and bring investment to the area; for example the increase in population as a result of development would justify an extend Metrolink to Hyde town centre (although no current plans are in place to do this);
- Whilst there is some support for an extension of the Metrolink to Stalybridge via Tameside Hospital other respondents have objected to the proposal identified in the Draft Greater Manchester Transport Plan as insufficient footfall, no justification, does not reach housing estates would cause more traffic congestion and as Stalybridge has an existing rail service to Manchester
- Cycling infrastructure to be improved across Tameside in order to encourage people to use other modes of transport than the car - e.g. links to work, shops and school and encourage use of public transport for longer journeys;
- Development would improve footpaths, cycle route and access to local countryside;
- Concern regarding volume of traffic and safety of horse rider with daily RTA's between motor vehicles and horses.
- Consequence of Tameside public transport strategy focusing on Ashton town centre has contributed to the decline of surrounding towns.
- All neighbourhoods within Tameside need to be easily accessible by public transport (e.g. ticketing options across all public transport companies and park and ride facilities), walking and cycling. Investment in other forms of public transport as limited resulting in more private car use adding to traffic issues;
- Acknowledge that additional housing is required, however, need to assess/mitigate potential transport implications of allocations and encourage use of and access to public transport;
- Public transport improvements are required between Gee Cross - A560 corridor – Hattersley
- Tameside less developed/polluted/congested than other parts of Greater Manchester and therefore able to absorb an increase in traffic/transport
- Proposed site has decent access to road network and good public transport links

#### **Physical Infrastructure and utilities**

- Concern that there is inadequate infrastructure in place and that no additional funding has been identified to support the increase in demand resulting from the proposed development;
- Although the focus for residential development in Tameside is in the S and SE of Hyde there has been no significant investment in infrastructure in decades; and
- Development phase including the installation of new roads, services and utilities will impact/ result in congestion on local highways and potentially have negative effect on economy (loss of hours etc.).

#### **Social Infrastructure**

- Improvements to existing social infrastructure are required now, with local services under pressure to meet existing demand and concern that there is not the capacity necessary to support an increase in population resulting from the proposed development;

<ul style="list-style-type: none"> <li>• Policy allocations do not include provision for an increase in school places. Schools are already oversubscribed resulting in an insufficient number of nurseries and school places available and will not be able to support an increase in pupil numbers;</li> <li>• Concern about increase levels of crime;</li> <li>• Health care providers (GP surgeries, dentists and Tameside Hospital) are already under pressure to meet satisfactory levels of patient care;</li> <li>• Concern that development will result in a rise of inequalities as there is insufficient social infrastructure in place to serve needs of the existing population (education and GP surgeries etc.).</li> <li>• Need to reconsider the infrastructure required to support an increase in the population as a result of the proposed allocations;</li> <li>• Amenities and improvement to social infrastructure (police, fire, health, education and commercial offer) are necessary prior to increasing population through proposed development;</li> <li>• Scepticism regarding the proposed delivery of and investment in infrastructure;</li> </ul>
<p><b>Environmental (including Green Infrastructure, Biodiversity, Open Space, Recreation)</b></p>
<ul style="list-style-type: none"> <li>• Development of green field sites will set a precedent leading to a lack of outdoor recreational space;</li> <li>• Development on greenspace around Newton and Flowery Fields, Hyde cannot continue;</li> <li>• Object to the sale of public owned greenspace and development on greenspace as the council has a duty to protect it;</li> <li>• Loss of vital greenspace, farmland and countryside to development will result in a loss of amenity and community recreational space</li> <li>• Development will result in a loss of natural environment and vital greenspaces, have a detrimental impact on biodiversity, wildlife, ancient fields and woodland and will reduce air quality and climate resilience as well as preventing free movement of people/ walking as alternative mode of travel to the car/ public transport; and</li> <li>• There are economic, social and environmental benefits associated with the retention and enhancement of rural areas.</li> <li>• There is green infrastructure on site and the development will enhance local woodland and the boundary between the development and countryside; and</li> <li>• Support for the retention of Haughton Dale Nature Reserve.</li> </ul>
<p><b>Air Quality (including Climate Change and Pollution)</b></p>
<ul style="list-style-type: none"> <li>• Proposal does not consider wider projects and commitments to reduce emissions across the borough;</li> <li>• Concerns relating to clean air and the loss of greenspace impacting on air quality;</li> <li>• Development will impact on climate change and increase the use of motor vehicles (private and public transport) thus increasing congestion, pollution and carbon emissions.</li> </ul>
<p><b>Flood risk</b></p>
<ul style="list-style-type: none"> <li>• Development will result in an increase in flood risk</li> </ul>
<p><b>Heritage</b></p>
<ul style="list-style-type: none"> <li>• Heritage assets have been lost/harmed due to residential redevelopment e.g. Roe Cross.</li> </ul>
<p><b>Other</b></p>
<ul style="list-style-type: none"> <li>• Insufficient public consultation with further work required to raise awareness of the GMSF with local residents;</li> <li>• 2019 Draft GMSF needs to be reviewed. Local residents object to the plan and allocations. Development is not required in Tameside, allocations will have a detrimental impact on the local area and the community, lead to disruption and</li> </ul>

community tension and will not consider the quality of life for existing and new residents allocations will only benefit landowners;

- Scepticism that GMSF can be achieved;
- Allocations should not contradict Greater Manchester wide policies;
- Government seeking to increase number of new homes as a means to boost the economy;
- Object to the use of the 2014 household projections set out in the 2018 Standard Methodology for Assessing Local Housing Need rather than the 2016-based household projections, which would result in a reduction in local housing need across Tameside and Greater Manchester. The ensuing reduction in numbers would not require development within the Green Belt and would go further to meet ambitions to deliver green legacy outlined in Chapter 8 of the 2019 Draft GMSF. Tameside will not be able to support the increase in population proposed using the current methodology;
- Consideration should be given to planning for a New Town complete with sufficient infrastructure to meet need;
- Increase in traffic and congestion will increase pollution - Tameside has high rate of cardio vascular disease
- Development should be distributed equally across the borough as proposed allocations are weighted towards Hyde which has already been subject to a disproportionate amount of development within the last few years. Hyde Birth rate is falling. The increase in population, homes and cars following development will impact on the existing residents in Hyde and local infrastructure/resources;
- 2019 Draft GMSF site allocations evidence base is poor e.g. around Hattersley;
- GMSF plan period to be reduced to 15 years therefore negating the need to develop Green Belt;
- Continued development within Greater Manchester will have a negative impact on the health;
- Redevelop town centres to reflect changes in shopping habits with a mix of office and residential uses and GI to encourage the community back into town centres;
- Support for the regeneration of Woodley, Stalybridge and Hyde Town Centres - attract people back into town centres will avoid residents commuting elsewhere by car; and
- Stalybridge Town Centre Challenge has the opportunity to meet housing targets by redevelopment of derelict/ empty buildings within the town centre and close to transport infrastructure. The £50K government funding to redevelop brownfield sites and Future High Street Fund could be used to regenerate town centres to provide housing and office space and create local jobs.
- Support the 2019 Draft GMSF - development that is not high rise city centre and where people want to live, with site allocated located adjacent to urban areas; and
- Need to produce a Local Strategic Plan to guide and promote sustainable social and economic development, regeneration and transport across the borough.

**Response to comments**

Strategic site policies do not set a housing or employment land target, nor consider the spatial distribution of development, policies need to be read across the plan as a whole. Land supply is set out within the accompanying topic paper, available via Mapping GM and the Council will continue to review and update its Brownfield Land Register.

The Councils existing housing land supply has been optimised to make best use of accessible sites within the existing urban area, moreover GMSF policy GM-H 4 covers the matter of housing density. New homes will be delivered across a range of types and tenures in accordance with the most up to date assessment of housing need as set out in strategic site policy.

The case for exceptional circumstances is set out for the Green Belt as a whole and the specific case for each strategic site within the accompanying topic paper. Sites are selected based on the site selection criteria as set out in more detail in relevant topic paper.

Policy requires the provision of developer contributions toward transport infrastructure as appropriate and a Locality Assessment has been undertaken to assess impact on highway infrastructure and set out mitigation options. Moreover, policy GM-S 6 covers the concept of clean air and the GM Transport Strategy Delivery Plan identifies options to deliver a range of interventions in the transport network.

Employment, education and training opportunities are required to be available for residents within the local area. Policy requires appropriate contributions toward education, health and other infrastructure and where appropriate the setting aside of land unless not required.

Strategic site policy recognises the need to protect and enhance key landscape and ecological features including where relevant identified features of value including ancient woodland, Sites of Biological Importance and a Preliminary Ecological Appraisal has been undertaken. Moreover policy GM-G 9 covers the concept of net enhancement for biodiversity and geodiversity.

Public rights of way, sustainable travel routes, enhancement of connectivity and the setting aside land for a range of public open spaces are also strategic site policy points. In addition an Open Space Review has been undertaken. Policy GM-G 9 also recognises that a limited amount of development on agricultural land is necessary, alongside requiring appropriate assessment.

A level two Strategic Flood Risk Assessment has been undertaken across the plan and site specific policy identifies where relevant the need for site wide drainage strategy, incorporating sustainable urban drainage systems. Moreover, Policy GM-S 5 covers the concept of Flood Risk and the Water environment. Policy identifies potential to deliver development that is energy efficient and resilient to climate change using zero carbon and energy positive technology. Moreover, policy GM-S 2 covers the concept of carbon and energy.

Where relevant, policy requires an assessment of archaeology and or, heritage impact assessment and a Historic Environment Assessment has been undertaken for all three strategic sites.

A Viability Assessment has been undertaken and strategic sites shown to be viable



### 3.2.11. Strategic Allocations in Trafford

There are 2 allocations in Trafford. There were 1,945 comments received in relation to the Trafford allocations.

#### GM Allocation 45: New Carrington (740 comments)

Many people objected to the principle of Green Belt loss on the site and to the impact development would have on Carrington Moss, which respondents noted for its biodiversity value and the habitat it provides for red listed birds. Respondents also raised transport and social infrastructure as key issues, both in terms of existing capacity as well as the additional provision which will be required to support the proposed development. Air quality was also a significant concern.

<b>Principle / scale of development</b>
<ul style="list-style-type: none"> <li>• The site will contribute to meeting the housing land supply shortfall.</li> <li>• The New Carrington site does not align with the GMSF objective to invest in the north of Greater Manchester.</li> <li>• General concern that the scale of the site, across three different communities will lead to a loss of local identity.</li> <li>• Ensure that the relationship between new development and the existing Partington estate is satisfactory.</li> </ul>
<b>Housing (inc affordable housing)</b>
<ul style="list-style-type: none"> <li>• Significant support for affordable housing with many responses stating that the 30% requirement should be higher, conversely some developers object to the 30% requirement.</li> <li>• There is a need for affordable housing which is suitable for both families and single individuals.</li> <li>• Concern that 'affordable' housing is not genuinely affordable to many people.</li> <li>• Much of the housing stock in this area is terraced housing and there is a need for detached, family housing.</li> </ul>
<b>Employment and Economy</b>
<ul style="list-style-type: none"> <li>• No evidence to support the need for such a large amount of employment land.</li> <li>• The proposed warehouse development will not generate sufficient jobs in the local area.</li> <li>• Some support from respondents for the proposed employment land around the north of the site, adjacent to existing employment areas.</li> </ul>
<b>Green Belt</b>
<ul style="list-style-type: none"> <li>• Significant objection to the loss of Green Belt land.</li> <li>• General concern that the level of Green Belt loss in Trafford is disproportionate considering the currently small amount of Green Belt in Trafford when compared with other GM districts.</li> <li>• The proposed loss of green space will have a negative impact on health and wellbeing</li> <li>• Concern about how the remaining Green Belt will be protected.</li> </ul>
<b>Brownfield</b>

<ul style="list-style-type: none"> <li>• Support for brownfield development within the New Carrington allocation.</li> <li>• Respondents considered that housing should be delivered on the brownfield land only, this would negate the need for Green Belt release.</li> </ul>
<p><b>Transport – Highways / Public Transport / Cycling / Walking</b></p>
<ul style="list-style-type: none"> <li>• Significant concern about existing congestion issues on the road network, particularly on the A6144 through Carrington.</li> <li>• Many respondents noted the limited information about the transport infrastructure needed to deliver the New Carrington site.</li> <li>• Significant concern from some residents about the proposed Carrington Relief Road and the lack of consultation on this proposal.</li> <li>• Some support for new link roads to relieve existing congestion.</li> <li>• Need to understand the impact the New Carrington development will have on the M60, Junction 8.</li> <li>• Existing public transport network is limited and the cost of many services is prohibitive to current residents using the network.</li> <li>• Significant support for improved public transport infrastructure and cycling and walking routes.</li> <li>• Rights of Way should be maintained with the same amenity value.</li> </ul>
<p><b>Physical Infrastructure and utilities</b></p>
<ul style="list-style-type: none"> <li>• Significant Control of Major Accident Hazards (COMAH) and gas pipe constraints across the site which will restrict development</li> <li>• A landscape buffer should be retained around the Altrincham WWTW. There may also be a need to expand the treatment works in future.</li> </ul>
<p><b>Social Infrastructure</b></p>
<ul style="list-style-type: none"> <li>• Concern that GP practices in the area are already overstretched and that new provision would be required to support the development</li> <li>• Many schools are already oversubscribed, particularly at primary level</li> </ul>
<p><b>Environmental – Green Infrastructure, Biodiversity, open space</b></p>
<ul style="list-style-type: none"> <li>• Significant concern about the loss of wildlife habitats</li> <li>• Significant objection to the loss of mossland, respondents considered that this should be retained for its biodiversity value and as a carbon store</li> <li>• Concern about the loss of green infrastructure</li> <li>• Concern about the landscape impact of the development. Much of the site is currently open countryside</li> <li>• The site offers an opportunity for biodiversity net gain</li> </ul>
<p><b>Air Quality</b></p>
<ul style="list-style-type: none"> <li>• Development will have a negative impact on air quality</li> <li>• Concern that the proposed new roads will impact on air quality</li> </ul>
<p><b>Flood risk</b></p>
<ul style="list-style-type: none"> <li>• Carrington Moss floods on a regular basis and helps to prevent flooding of the surrounding area</li> <li>• SUDS should form part of the development</li> </ul>
<p><b>Heritage</b></p>
<ul style="list-style-type: none"> <li>• Development to the south of the allocation needs to consider the setting of Dunham Massey</li> </ul>
<p><b>Other</b></p>

- The Carrington site does not fit the GMSF Spatial Strategy
- Significant concern that the development will cause increased noise and light pollution
- Object to safeguarded land within the allocation and consider this should be available for development within the plan period
- Some developers support the requirement for a Masterplan or SPD, whilst others object to this requirement
- Likely to be construction difficulties associated with development on a peat bog
- The GMSF consultation has not been properly publicised

### **Response to Comments**

The site selection paper identifies that New Carrington fits the Spatial Strategy as it meets criteria 1, 2, 3, 5, 6 and 7.

The New Carrington site will make a significant contribution to meeting the housing needs of Trafford and GM. Trafford has insufficient land within its urban area to meet its housing need, however work to maximise the existing urban land supply has meant that the size of the New Carrington development site has been reduced and less land is now proposed to be removed from Green Belt than in 2019.

The revised New Carrington allocation policy recognises the distinct character areas within the Carrington allocation and also considers how to integrate new development with existing communities at Carrington, Partington and Sale West.

Employment development is located predominately on brownfield land which is not in the Green Belt and land where a residential use is unacceptable due to the location of Control of Major Accident Hazards (COMAH) and gas pipe constraints.

The case for exceptional circumstances is set out for the Green Belt proposals as a whole and the specific case for this allocation in the accompanying Allocation Topic Paper.

Development at New Carrington offers the opportunity to regenerate brownfield land to create a new place supplying a range of different sizes of homes to meet both market and affordable housing need as set out in the Trafford Housing Needs Assessment 2019.

Transport analysis contained in the Locality Assessment has identified necessary mitigation to accommodate any additional traffic generated by the proposed allocation including link roads through the site, mitigations on the surrounding network, new bus services and cycling and walking routes to encourage active travel.

Social infrastructure requirements are highlighted in the New Carrington policy and all development will be expected to contribute to the provision of additional school places, health care facilities etc.

The New Carrington policy requires development to protect and enhance national and locally designated assets of conservation, ecological and landscape value. Significant green infrastructure areas have been identified within the New Carrington allocation which will be enhanced, and access to and through these areas improved as part of the development. Landscape buffers will also be a key feature, forming new Green Belt boundaries and mitigating any impact on important views to and from the site.

The policy requires a drainage strategy for the site to mitigate flood risk.

The GMAAS Historic Environment Assessment for New Carrington sets out the requirements for the protection of heritage and archaeological assets and where further work is required in advance of a planning application.

The policy requires a detailed Masterplan / SPD in advance of a planning application. This will include an equalisation mechanism to ensure all development contributes proportionately to the physical and social infrastructure requirements.

**GM Allocation 46: Timperley Wedge** (944 comments)

Many people objected to Green Belt loss with the particular reason for this being its importance as a green buffer to filter noise and pollution from the expanding Airport. Respondents also raised transport and social infrastructure as key issues, both in terms of existing capacities, particularly in terms of congested roads, as well as the additional provision which will be required to support the proposed development. There was also a perceived concern that development would result in a loss of existing sports facilities.

<b>Principle / scale of development</b>
<ul style="list-style-type: none"> <li>• With pressure for residential and commercial land in the surrounding area development will help to meet the shortfall</li> <li>• More housing is not needed in the area, it could better be provided in other urban areas in Trafford ,Carrington and GM</li> <li>• Concern that the density, type of housing, design of the development and its close proximity to the airport is not appropriate</li> <li>• Support for development as it on the edge of an existing settlement, in a high market area, close to amenities and the airport</li> </ul>
<b>Housing (inc affordable housing)</b>
<ul style="list-style-type: none"> <li>• Support for affordable housing with responses stating that the 30% requirement should be higher as this is such an expensive area</li> <li>• There is a need for affordable housing which is suitable for first time buyers</li> </ul>
<b>Employment and Economy</b>
<ul style="list-style-type: none"> <li>• There are enough existing empty office spaces already in the surrounding area</li> <li>• There is no evidence for the amount of proposed office space</li> <li>• Other areas need the regeneration benefits more than Timperley</li> </ul>
<b>Green Belt</b>
<ul style="list-style-type: none"> <li>• Significant objection to the loss of Green Belt land</li> <li>• General concern that the level of Green Belt loss in Trafford is disproportionate considering the currently small amount of Green Belt in Trafford when compared with other GM districts</li> <li>• Green Belt is needed to separate the airport expansion from Hale Barns, Timperley and Well Green</li> <li>• Concern that development in this area will set a precedent for more housing and changes to the Green Belt in the future</li> </ul>
<b>Brownfield</b>
<ul style="list-style-type: none"> <li>• More brownfield sites should be identified throughout Trafford and Greater Manchester such as empty homes and land that was previously industrial</li> <li>• The development of brownfield sites should be prioritised before Green Belt development</li> <li>• Areas of brownfield within the allocation make it a suitable site for development</li> </ul>
<b>Transport – Highways / Public Transport / Cycling / Walking</b>
<ul style="list-style-type: none"> <li>• Significant concern that the roads are already too congested and the country lanes and surrounding road network, including the M56 motorway corridor, will be impacted by the additional cars more houses would bring to the area.</li> <li>• Support for a new road to link Altrincham with the airport and the hospital but want to know where the new roads, particularly the spine road, will go.</li> <li>• More investment in the Metrolink line and public transport is needed rather than new roads and the widening of existing roads</li> <li>• Support for the Metrolink extension and a new stop at Davenport Green but concern over the certainty of it happening and if it relies on HS2</li> </ul>

<ul style="list-style-type: none"> <li>• Support for walking and cycling routes particularly off road routes</li> <li>• There is an opportunity to provide a link from the development to the Trans Pennine Trail at Altrincham.</li> </ul>
<p><b>Physical Infrastructure and utilities</b></p>
<ul style="list-style-type: none"> <li>• Concerned about the existing poor levels of utilities and digital infrastructure and that the requirement for major investment in these could be very disruptive in the area.</li> </ul>
<p><b>Social Infrastructure</b></p>
<ul style="list-style-type: none"> <li>• Concern that the existing GP practices, schools, Wythenshawe hospital and police in the area are already overstretched and that new provision would be required to support the development.</li> <li>• More detail on new provision for social infrastructure is needed</li> <li>• There is no certainty or a requirement in the development proposal that the infrastructure will be put in place before any houses are built.</li> <li>• Concern that shops in the small local villages in Timperley and Hale Barnes will be overwhelmed. More details are needed on new shops.</li> </ul>
<p><b>Environmental – Green Infrastructure, Biodiversity, open space</b></p>
<ul style="list-style-type: none"> <li>• Significant concern about the loss of species, ponds, wildlife corridors and habitats including SBIs and ancient woodland</li> <li>• Concern over the loss of open space and playing fields. These are important for physical and mental health</li> <li>• Concerned that existing PROWs would be lost e.g Brooks Drive and Bowdon Rugby Club</li> <li>• Green infrastructure should be enhanced in the area and made more accessible</li> <li>• There are opportunities for biodiversity net gain within the allocation</li> <li>• Concern over the loss of agricultural land</li> </ul>
<p><b>Air Quality</b></p>
<ul style="list-style-type: none"> <li>• Significant concern about an increase in air pollution particularly will the existing pollution from Manchester Airport and the effect of this on the health of residents</li> </ul>
<p><b>Flood risk</b></p>
<ul style="list-style-type: none"> <li>• Significant concern about increased flooding as a result of development particularly as areas like Clay lane fields and Fairywell Brook flood now</li> <li>• There are opportunities to provide net gains in flood storage</li> </ul>
<p><b>Heritage</b></p>
<ul style="list-style-type: none"> <li>• Field based archaeological assessment should be done</li> <li>• Concern that features of local historic interest will be lost</li> <li>• Concern that the site can accommodate the proposed quantum of development without harm to the significance of the heritage assets and their setting</li> </ul>
<p><b>Other</b></p>
<ul style="list-style-type: none"> <li>• Merging the character of different residential areas together will cause Timperley to lose its identity and appeal</li> <li>• Development would not be in keeping with existing properties in Hale</li> <li>• More needs to be known about the effects of HS2</li> <li>• Concerned that development is dependent on HS2 which may not happen</li> <li>• Concern about an increase in noise and light pollution from proposed development. The airport can already be heard.</li> </ul>
<p><b>Response to comments</b></p> <p>The allocation meets criteria 2,5,6 and 7 of the site selection criteria</p> <p>The Timperley Wedge site will make a significant contribution to meeting the housing needs of Trafford and GM. Located in a high value market area the area has shown</p>

sufficient viability in the GM Viability Assessment to deliver 45% affordable housing. This is higher than the 30% proposed in 2019. Trafford's Housing Needs Assessment 2019 identified an average need for 40% affordable housing across Trafford and this site will make an important contribution to meeting this need

The Timperley Wedge policy sets out a need to provide a range of housing densities and sizes that will be of a high design quality and respect the local character of adjoining communities. Masterplanning has shown higher densities are appropriate close to the proposed new Metrolink station at Davenport Green and HS2. Slightly less land is now proposed to be released from Green Belt than in 2019.

The area proposed for office use is not located in the Green Belt.

A significant area of land between the allocation and Hale Barns will remain in the Green Belt as a rural park.

Transport analysis contained in the Locality Assessment has identified necessary mitigation to accommodate any additional traffic generated by the proposed allocation including a new spine road and extensions to bus services as well as new cycling and walking routes to encourage more active transport.

Social infrastructure requirements are highlighted in the Timperley Wedge policy and all development will be expected to contribute to the provision of additional school places, health care facilities etc. A new Local Centre will provide local shopping facilities.

The policy requires the protection and enhancement of natural environment assets including SBIs, woodland, and hedgerows within the site. In addition, the policy specifically protects Manor Farm playing fields and requires provision of new accessible green infrastructure links through the allocation, landscape buffers and a new rural park.

The policy requires a drainage strategy for the site to mitigate flood risk.

The GMAAS Historic Environment Assessment for Timperley Wedge sets out the requirements for the protection of heritage and archaeological assets and where further work is required prior to any planning application.

Policy sets out approval of a masterplan will be needed prior to any development which will set out an equalisation mechanism to ensure all development contributes proportionately to the physical and social infrastructure requirements.

## Further comments on the overall proposals for Trafford, including strategic transport interventions (261 comments)

<b>Principle / scale of development</b>
<ul style="list-style-type: none"> <li>Concerned that the scale of development proposed is inconsistent with Trafford's Local Plan</li> </ul>
<b>Housing (inc affordable housing)</b>
<ul style="list-style-type: none"> <li>The wrong ONS figures have been used to calculate housing need.</li> </ul>
<b>Green Belt</b>
<ul style="list-style-type: none"> <li>Reduce ambitions for economic growth so that releasing Green Belt is not required.</li> </ul>
<b>Brownfield</b>
<ul style="list-style-type: none"> <li>Trafford needs to look at developing significant amounts of unutilised brownfield sites along transport links.</li> </ul>
<b>Transport – Highways / Public Transport / Cycling / Walking</b>
<ul style="list-style-type: none"> <li>Road congestion needs to be addressed.</li> <li>Concern that there is not enough off road parking.</li> <li>Improve public transport capacity, frequency and make it more affordable to reduce reliance on cars.</li> <li>Object to HS2 because of its impact on the environment, ancient woodland and its high cost.</li> <li>Support for off road cycling paths and separate cycle lanes.</li> <li>Improve infrastructure for cycling, walking and horse riding.</li> <li>Support for Bee Lines Network.</li> <li>The Trans Pennine Trail must be kept fully accessible during the development of HS2 and the reinstatement works should result in improvements to the existing route.</li> </ul>
<b>Air Quality</b>
<ul style="list-style-type: none"> <li>Policy should state that any transport plans should never result in reductions in air quality.</li> <li>Concerned that air quality in Trafford is below legal limits and urgent action needs to be taken to address this.</li> </ul>
<b>Other</b>
<ul style="list-style-type: none"> <li>Reduce the plan period to avoid the need to release Green Belt for development.</li> <li>There has not been adequate publicity on these proposals</li> <li>Support for the removal of the allocation at William Wroe, Flixton</li> </ul>
<b>Response to comments</b>
<p>The GMSF will set the strategic policy framework for the Trafford Local Plan</p> <p>The Trafford housing land supply includes a significant number of sites in the existing urban area, which includes brownfield sites. The development potential of these sites has been maximised to help minimise the Green Belt loss.</p> <p>Transport Locality Assessments have been prepared for each of the Trafford allocations – New Carrington and Timperley Wedge. These assessments identified necessary mitigations to the highway network, as well as new cycling and walking routes to facilitate more active travel</p>



### 3.2.13. Strategic Allocations in Wigan

There are 5 allocations in Wigan. There were 1,487 comments received in relation to the Wigan allocations.

#### **GM Allocation 47: South of Pennington** (184 comments)

Some landowners support the allocation, commenting that the agricultural value of the site is limited, despite claims that is valuable by local residents. But some landowners are unwilling to sell their land.

Similar to comments on M6 J25, many people believed that empty business units and vacant previously developed land should be used first before considering Green Belt land. People thought that the site was a less attractive location for employment development than sites closer to the M6.

Local groups thought that the development of the site would sever the wildlife corridor between the Pennington Flash and the mosslands to the south and that the proposed green corridor to seek to retain this link is too narrow. Other concerns about impact on biodiversity, air pollution, local shops, services, schools and health facilities and loss of farmland.

<b>Principle / scale of development</b>
<ul style="list-style-type: none"> <li>Mixture of support and objections from landowners on the site for development.</li> </ul>
<b>Housing (inc affordable housing)</b>
<ul style="list-style-type: none"> <li>The housing requirement for Wigan is too high.</li> <li>The most recent Office of National Statistics (ONS) population projections from 2018 should be used to calculate housing needs, not the population projections from 2016. The 2018 figures indicate lower population growth in the borough than the 2016 figures.</li> <li>Inward immigration into the borough has an impact on housing needs.</li> <li>Too much housing has been built and is proposed in Lowton, Golborne and Leigh than other parts of the borough.</li> </ul>
<b>Employment and Economy</b>
<ul style="list-style-type: none"> <li>Empty business units and previously developed land should be used first before considering Green Belt land.</li> <li>Locations closer to the M6 should be used for employment development and will be more attractive to businesses.</li> <li>Many warehouses are under construction and are proposed in neighbouring local authorities e.g. St. Helens, Warrington and West Lancashire. Consequently, it was questioned as to whether any more warehouses are needed in Wigan?</li> <li>Warehouse jobs created by the development will become automated in the future.</li> <li>A developer has not been found for the site. Consequently, how will the site be delivered?</li> <li>Jobs created on the site are likely to be low skilled and cannot be guaranteed for Wigan residents.</li> <li>The jobs created on the site from the proposed development would be more beneficial to the local community than the current farming operations on part of the site.</li> </ul>
<b>Green Belt</b>
<ul style="list-style-type: none"> <li>Development on the site would result in the loss of Green Belt which would merge Golborne, Lowton and Leigh and change the character of the area.</li> </ul>

<ul style="list-style-type: none"> <li>• Infrastructure to provide guided busway services to the site would have a detrimental impact on Green Belt.</li> <li>• No exceptional circumstances have been demonstrated that outweigh the harm to Green Belt when the National Planning Policy Framework states that local authorities should show fully evidenced justification for a Green Belt boundary change.</li> <li>• Putting Leigh Sewage Works into Green Belt serves no Green Belt purpose and has only been done to balance the loss Green Belt that is proposed for development.</li> </ul>
<b>Brownfield</b>
<ul style="list-style-type: none"> <li>• Empty business units should be used for new employment development.</li> <li>• Brownfield sites should be used first before considering greenfield sites.</li> </ul>
<b>Transport – Highways / Public Transport / Cycling / Walking</b>
<ul style="list-style-type: none"> <li>• The existing road network is already at full capacity at peak times, particularly the A580 East Lancashire Road, A579 Atherleigh Way, A527 Newton Road/ St. Helens Road, Warrington Road and Winnick Lane. This proposal together with the other proposed GMSF allocations and existing development commitments in the area will significantly exacerbate congestion.</li> <li>• Traffic impacts from the site and the baseline supply of housing in the area are likely to have cross boundary impacts into St. Helens Borough.</li> <li>• Creating another junction on the A579 to access the site will increase traffic congestion.</li> <li>• The proposed junction on the A579 can accommodate traffic flows in the area.</li> <li>• A significant amount of investment in the transport infrastructure in is required to reduce traffic congestion on the local road network, but opportunities to do so are limited.</li> <li>• A road connection from Leigh to the M61 is required to alleviate congestion.</li> <li>• The development will add more HGVs on Winnick Lane accessing M6 Junction 22 as an alternative to the A580.</li> <li>• Beech Walk is an unsuitable road to extend guided busway services into the site because the road is too narrow, suffers from potholes, is congested at peak times, subject to Tree Preservation Orders and will have a negative impact of the amenity of properties along the road.</li> <li>• Other roads in Pennington are also unsuitable to accommodate an extension to guided busway services.</li> <li>• The extension to the guided busway should be along the A580.</li> <li>• The potential re-opening of Golborne, Kenyon Junction and Glazebury Stations will not alleviate traffic congestion in Leigh and there is a lack of detail about the proposal.</li> <li>• The car parking in Leigh Town Centre for the Guided Busway is at full capacity. More spaces are required.</li> <li>• Bus services should be improved from Wigan to Leigh as current journey times are slow.</li> <li>• Bus services from Wigan and Leigh to Warrington, Liverpool, Trafford Park and Manchester Airport should be improved as these areas are major employment locations.</li> <li>• At peak hours the Guided Busway does not have sufficient capacity, is slow and does not relieve congestion in the local area.</li> </ul>
<b>Physical Infrastructure and utilities</b>
<ul style="list-style-type: none"> <li>• The development will have an impact on the electricity, gas and sewer network.</li> <li>• Development on site would need to build around the gas and sewer pipelines which cross the site.</li> </ul>
<b>Social Infrastructure</b>
<ul style="list-style-type: none"> <li>• Local schools, GP surgeries and dentists are at full capacity and will not be able to accommodate demand from the site.</li> </ul>
<b>Environmental – Green Infrastructure, Biodiversity, open space</b>
<ul style="list-style-type: none"> <li>• Wildlife habitats on the site for variety of species, including protected species, will be lost if development goes ahead.</li> <li>• There is no information on the current ecological value of the site.</li> <li>• A biodiversity net gain should be implemented on site.</li> </ul>

<ul style="list-style-type: none"> <li>• The proposed area on the site for the retention of the Wildlife Corridor is not wide enough and will have a detrimental impact on the wider wildlife corridor that connects Pennington Flash with the mosslands to the south of the site, which will impact on the ability of species to adapt to climate change.</li> <li>• The watercourse on site are green assets and should be protected and need to be modelled to understand the risk of flooding from them in more detail.</li> <li>• Hydrological modelling is required to determine if the site hydrologically connected to Abram Flashes (SSSI) to the North and Astley and Bedford Moss (SSSI) forming part of the Manchester Mosses (SAC) to the south.</li> <li>• The recreation value of the site for walking along public footpaths will be lost.</li> <li>• How will the development affect Leigh Rugby Union Football Club and the bowling green off Beech Walk?</li> </ul>
<p><b>Air Quality</b></p> <ul style="list-style-type: none"> <li>• HGV movements associated with the development will increase carbon emissions and air pollution along the A580 which is already suffers from poor air pollution.</li> <li>• The site and surrounding area lie in a dip which means that on cold evenings, air pollution collects around the site.</li> <li>• There was no information at the drop-in events about the poor air quality along the A580.</li> </ul>
<p><b>Flood risk</b></p> <ul style="list-style-type: none"> <li>• The site suffers from river flooding and groundwater flooding due to the high water table. Gardens and basements in the local area are regularly flooded by groundwater. Therefore, development on the site could affect natural drainage and increase the risk to nearby properties.</li> <li>• Groundwater flood risk would be difficult to mitigate.</li> <li>• The pumping station to the north of the site and the drainage ditch adjacent to Moreton Drive/Donnington Close play a significant role in draining the land in the vicinity of the site. It is important that any development on the site does not affect this drainage arrangement.</li> <li>• Sustainable drainage systems are not referred to in allocation policy but should be.</li> </ul>
<p><b>Heritage</b></p> <ul style="list-style-type: none"> <li>• Development on the site would result in the loss of a historic farming community in Leigh. The setting of the Yew Tree Farm listed building on the site should be respected.</li> </ul>
<p><b>Other</b></p> <ul style="list-style-type: none"> <li>• Agricultural land on the site will be lost to development.</li> <li>• The site has limited farming value which has decreased over time.</li> <li>• Landowners on the site are concerned about their land being compulsory purchased when they are unwilling to sell their land to development.</li> <li>• It was difficult to see how site would connect with surrounding roads and from the maps displayed at the drop-in sessions.</li> <li>• It is difficult to find evidence of cooperation and consultation with neighbouring local authorities.</li> <li>• The consultation drop-in event times were not suitable for everyone.</li> <li>• Some landowners found out about the proposal from residents as no letter was sent to them from the Council.</li> </ul>
<p>The 2019 GM Policy GM Allocation 47: South of Pennington has been removed and will not be included in the 2020 GMSF.</p>

**GM Allocation 48: M6 J25** (609 comments)

One of the most frequent issues that residents raised was that this site was previously proposed to be allocated for employment uses during preparation of the Wigan Local Plan Core Strategy. However the Inspector dismissed the site at the examination stage in 2013. Local residents have questioned why it is proposed again when it was dismissed previously and believe that nothing has changed to warrant it coming forward again.

Residents believe that previously developed sites and empty units, of which they think there are many, should be developed first before Green Belt land. They also think that there are too many employment development proposals along the M6 in Wigan, Warrington and St. Helens. – changing the character of the area, merging settlements and don't believe there is a need for all of it to be developed.

Other concerns about impact on congestion and highway safety, biodiversity, air pollution, loss of open fields and space for recreation and impact on nearby residential properties.

<b>Principle / scale of development</b>
<ul style="list-style-type: none"> <li>• It is questioned why the site is proposed for employment development when it was dismissed from the Wigan Local Plan Core Strategy during the Examination in 2013 by the planning inspector The site was dismissed because:             <ul style="list-style-type: none"> <li>○ The site was not required to meet employment needs up to 2026;</li> <li>○ The site would significantly harm the openness of the Green Belt;</li> <li>○ The site would be contrary to the purpose of including land within the Green Belt;</li> <li>○ The open countryside would be lost affecting the overall character of Wigan and Ashton In Makerfield; and</li> <li>○ The recreational value of the land would be lost.</li> </ul> </li> <li>• The site is a logical and most commercially suitable location with motorway access.</li> <li>• The site will have a positive impact on nearby existing employment sites.</li> <li>• The site is a good opportunity to improve M6 Junction 25.</li> <li>• The size of the site has been reduced from the first draft of the GMSF in 2016.</li> </ul>
<b>Housing (inc affordable housing)</b>
<ul style="list-style-type: none"> <li>• Land south of the M6 Junction 25 slip road should be allocated for housing.</li> </ul>
<b>Employment and Economy</b>
<ul style="list-style-type: none"> <li>• The number of jobs created by logistics development on the site is likely to be less than estimated and will be replaced by automation in the future. They are also likely to be low paid and low skilled. High value jobs in the digital sector are needed.</li> <li>• There is an oversupply of employment land being released from Green Belt along the M6 corridor in Wigan, St Helens, Warrington and West Lancashire.</li> <li>• Brownfield sites, vacant business units and town centre locations should be developed before greenfield sites. The extent to which these locations can meet or be refurbished to meet modern business needs should be assessed.</li> <li>• Why was the proposed employment site at Junction 26 removed from the GMSF? Junction 26 appears to be a better site than Junction 25.</li> <li>• Complimentary uses to the primary employment function of the site should be allowed on site.</li> </ul>
<b>Green Belt</b>
<ul style="list-style-type: none"> <li>• The development will significantly harm the Green Belt.</li> <li>• The need for warehouses on the site does not amount to special circumstances to outweigh the harm to Green Belt.</li> <li>• The development will merge Wigan and Ashton.</li> </ul>

<ul style="list-style-type: none"> <li>• This proposal and other proposals to remove land from Green Belt in St. Helens Borough along the M6 Motorway will merge Wigan and St.Helens.</li> </ul>
<p><b>Brownfield</b></p>
<ul style="list-style-type: none"> <li>• Previously developed sites and vacant premises should be used first for new employment development before building on Green Belt and greenfield sites. The proposal undermines urban regeneration.</li> </ul>
<p><b>Transport – Highways / Public Transport / Cycling / Walking</b></p>
<ul style="list-style-type: none"> <li>• The local road network and the M6 Motorway are already congested at peak times. The proposed development will worsen the congestion.</li> <li>• The proposed smart motorway from M6 Junction 26 to Junction 21a will add further delays to traffic flow in this area.</li> <li>• The cumulative impact of employment developments along the M6 in St. Helens and in Wigan will have an overall negative impact on congestion on the M6 and local roads.</li> <li>• The ‘half’ junction arrangement at M6 Junction 25 causes traffic congestion in the local area because vehicles, including HGVs either turn around at Junction 24, travel through Ashton-In-Makerfield Town Centre or use Junction 26 and travel through Pemberton.</li> <li>• The site should not be developed without a two-way junction at M6 Junction 25.</li> <li>• The M58 link road proposal might ease local congestion, but it is still some years away from being built.</li> <li>• Crossing points for cyclists and walkers should be built over the A49 to connect the proposed green infrastructure corridor with the Wigan Flashes.</li> </ul>
<p><b>Physical Infrastructure and utilities</b></p>
<ul style="list-style-type: none"> <li>• The development will have an impact on the electricity, gas and sewer network.</li> </ul>
<p><b>Social Infrastructure</b></p>
<ul style="list-style-type: none"> <li>• Local schools, GP surgeries and dentists are already at full capacity.</li> </ul>
<p><b>Environmental – Green Infrastructure, Biodiversity, open space</b></p>
<ul style="list-style-type: none"> <li>• Wildlife habitats on the site for variety of species, including protected species, will be lost if development goes ahead.</li> <li>• The fishing ponds on the site should be protected.</li> <li>• Concerns about impact on Glead Wood and Tan Pit Slip SBIs nearby.</li> <li>• There is no information about the current ecological value of the site.</li> <li>• A biodiversity net gain should be implemented on site.</li> <li>• The recreation value of the site will be lost because it the footpaths on the site are well used by walkers and there is very little greenspace in Winstanley.</li> <li>• The proposed green infrastructure corridor is too small and is will mitigate the loss the site to development.</li> <li>• The proposed green infrastructure corridor is welcome but is unclear how it will be maintained.</li> </ul>
<p><b>Air Quality</b></p>
<ul style="list-style-type: none"> <li>• High levels of air and noise pollution along the M6 and A49 Warrington Road already exist. The significant level of traffic that the site will generate, especially HGVs, will exacerbate this.</li> <li>• Increased noise and air pollution will have a negative impact on the health and wellbeing of local people.</li> </ul>
<p><b>Flood risk</b></p>
<ul style="list-style-type: none"> <li>• The Marus Bridge junction has flooded previously after heavy rainfall and there is a concern that the development could increase the risk of flooding in the area from hardstanding and impermeable surfaces.</li> <li>• The site plays major role in absorbing surface water in the local area.</li> </ul>

- Sustainable drainage systems should be used on the site.

**Other**

- The proposed development will cause light pollution.
- The construction of the development will be disruptive to local residents and could take many years to complete and will operate 24 hours a day.
- The proposal is too large for the site and local area and will have a negative impact on the landscape.
- The area was mined for coal which may have an impact on developing the site.
- 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.
- Loss of views, privacy and value to properties adjacent to the site.

**Response to Comments**

Principle of development:

There have been several material changes in circumstances since the proposals to take this site out of the Green Belt for employment development was rejected by an independent planning inspector as part of the examination of the Local Plan Core Strategy in 2013. These include:

- The Inspector's decision was taken over seven years ago and was based on an evidence base which pre-dated 2012.
- The employment market has strengthened in the borough since 2013, with much increased demand for high quality sites of a sufficient scale that are directly accessible to the motorway network.
- There has been a negligible employment take up in the borough since 2011, significantly below plan requirements, plus a longstanding and continuing trend of employment land lost to non-employment uses primarily on poorer quality sites in secondary locations.
- There is a significant shortfall against the Core Strategy requirement for 200 hectares (gross) of new employment development by 2026. The Inspector's conclusion that land at M6 Junction 25 was not needed quantitatively, on the basis that there were sufficient available and deliverable non-Green Belt sites elsewhere in the borough, has proven to be incorrect.
- At the Core Strategy examination, the site was not being promoted by a developer which cast some doubt on its deliverability. The site has now received a planning application from a well-known and leading employment developer with a strong track record of delivering employment schemes in Wigan, the North West and nationally. The planning application is also based on detailed technical reports which demonstrate the delivery of the scheme.

Furthermore, paragraph 120 of the NPPF requires planning decisions to reflect changes in the demand for land, which is to be informed by regular reviews of land allocated for development in plans and land availability.

Employment and Economy:

Based on the Employment Density Guide produced by the Homes and Communities Agency (HCA), the site is anticipated to generate in the region of 1,600 new full-time equivalent jobs.

Complementary uses to the employment proposal on site may be appropriate in principle. However, such proposals would need to be considered at the planning application stage against the needs to deliver a quality business environment which will generate significant inward investment, and new employment and training opportunities for local people.

The proposed employment allocation at M6 Junction 26 was removed from the GMSF due to doubts over its deliverability due to land ownership constraints.

Green Belt:

As set out in Section 12 of the Topic Paper, the 2020 Green Belt Harm Assessment concludes that the release of the allocation as a whole would constitute significant sprawl and encroachment on the countryside and a significant impact on preventing the merger of towns. However, it is the council's view that the development will bring significant benefits, as set out in the Topic Paper, that significantly outweigh its harm and represent exceptional circumstances in accordance with national planning policy.

Transport:

The Locality Assessment, as summarised in Section 8 of the Topic Paper, and the Transport Assessment in support of the Tritax Symmetry planning application have assessed the impact of the proposed development on the local highway network and conclude that the proposed development is acceptable in highway terms, subject to mitigation measures, and does not require the delivery of an all-ways junction at Junction 25. An all-ways junction however remains an aspiration of the council and the policy requires land to be safeguarded for its potential future delivery.

The M58 Link Road is a committed scheme with a view to starting on-site in 2021.

Clause 4 of the allocation policy requires the provision of a safe pedestrian crossing on the A49. A signalised crossing facility is proposed as part of the Tritax Symmetry planning application.

Physical Infrastructure and utilities:

Infrastructure providers have been consulted throughout the plan's preparation and have not raised any capacity issues as a result of the development. However, they encourage early engagement with prospective developers in undertaking of a comprehensive masterplanning approach for the site, as set out in Clause 1 of the revised site allocation policy. Clause 8 of the revised site allocation policy requires the development to provide sufficient easements for the significant utilities infrastructure running through the site.

Environmental – Green Infrastructure:

As set out in Sections 13 and 14 of the Topic Paper, and consistent with the Tritax Symmetry planning application, a significant area of Green Belt is to be retained to the south of Winstanley. This will form a green buffer between the development and existing

residential properties protecting residential amenity and affording opportunities to extend Wigan's Green Infrastructure network with enhanced footpaths which will provide links to the new employment park and to wider green infrastructure.

Biodiversity:

GMSF Policy GM-G9 requires developments to achieve a biodiversity net gain of no less than 10%.

A desk-based study and an Extended Phase 1 Habitat Survey of the site undertaken to inform the Tritax Symmetry planning application have confirmed that there are no legally protected species recorded on the site. The Greater Manchester Ecological Unit, in response to the planning application, have identified that the most common habitat on the site is a species-poor agricultural grassland of limited nature conservation value, but that the site is relatively complex and supports some locally important habitats including established woodland, hedgerows, ponds, marsh and marshy grassland. As such, and as set out in Section 16 of the Topic Paper, the current planning application, if approved, is conditional to the delivery of a holistic, site wide Habitat and Landscape Creation and Management Plan to mitigate its impact.

Protecting biodiversity from harm, including sites of biological importance such as Glead Wood and Tan Pit Slip, is a requirement of GMSF Policy GM-G9 which expects developments to apply the mitigation hierarchy of avoiding harm to biodiversity, then mitigating any harm, then compensating for any remaining harm.

Noise and air Quality:

As set out in Section 19 of the Topic Paper, part of the site is within a designated Air Quality Management Area.

As part of the planning application, a supporting Air Quality Assessment demonstrated that the adverse impacts of the development both during construction and its future operation can be mitigated to acceptable levels using good practice control measures.

In terms of noise and vibration, the development of this site for large logistics and distribution uses is likely to generate significant noise and associated vibration. To the north, east and south of the site there are a large number of noise sensitive receptors, predominantly housing. The development is proposed to be a considerable distance from existing residential and other noise sensitive uses. Additionally, there is a wide swathe of Green Belt to be retained to the north of the site between the development and Winstanley residential area which is expected to mitigate any noise generated on site satisfactorily.

Flood risk:

The Strategic Flood Risk Assessment (SFRA) undertaken in March 2019 does not identify any strategic threats from the development of the site. The site is located in Flood Zone 1 and has a low probability of fluvial/tidal flooding with a risk of less than 1 in 1,000 per year (<0.1%).

A Flood Risk Assessment (FRA) undertaken in support of the Tritax Symmetry planning application concluded that the proposed development is acceptable in flooding and drainage terms subject to the provision of drainage mitigation works, including a Sustainable Urban Drainage System (SuDS). An important aspect of the FRA has been to



ensure development of the site does not increase the rate of surface water run-off from current levels or to significantly increase the risk of flooding elsewhere to an unacceptable level. The use of SuDS is promoted through GMSF Policy GMS-5.

Other:

Mitigating the impact of developments on residential amenity, including in terms of noise, air and light pollution, is a requirement of policies in both the Core Strategy (Policy CP17) and the GMSF (Policy GM-E1). The impact on local residents during the construction phase will be managed through a Construction Environmental Management Plan (CEMP).

A Coal Mining Risk Assessment (CMRA) prepared in 2018 in support of the planning application has identified that past coal workings pose a risk to the proposed development of the site and that measures are required to mitigate this risk through the implementation of a series of intrusive site investigation works and remedial works as deemed appropriate. These conclusions have been agreed by the Coal Authority and any future development of this site would require a planning condition to ensure that the development is implemented safely and that public health is safeguarded.

The creation of local job opportunities should contribute positively to the health and wellbeing of local residents. The retention and enhancement of public rights of way connecting the site to neighbouring residential areas and the wider countryside will encourage active travel, walking and cycling for recreation and commuting to work.

In terms of its impact on health and wellbeing, assessments have confirmed that, subject to appropriate mitigation, the development of the site is acceptable in terms of noise, air quality, and highway capacity, and the policy requires biodiversity enhancement and the safeguarding of green infrastructure. The creation of local job and training opportunities should also contribute positively to the health and wellbeing of local residents.

The loss of views and impact of the development on property value is not a material planning consideration. The development will be assessed at the time of a planning application to ensure that existing properties are not unduly impacted as a result of loss of privacy however, given that there is a significant swathe of Green Belt that is being retained between Winstanley and the development there is unlikely to be a material impact on overlooking.

**GM Allocation 49: North of Mosley Common (149 comments)**

Most residents commented that a significant amount of housebuilding is ongoing or planned for the area through the baseline housing land supply which is already putting the road network under considerable strain. The proposed allocation would only add to the existing congestion problems and there is little space to improve the network to ease congestion.

Residents also believed that the allocation and the baseline supply sites in the area would merge Tyldesley, Little Hulton and Boothstown, significantly altering the character of the area. People also thought that creating a new stop on the Leigh Guided Busway that crosses the site would not improve public transport connections because the buses are at full capacity at peak hours.

Other concerns about impact on biodiversity, air pollution, local shops, services, schools and health facilities and loss of farmland.

<b>Principle / scale of development</b>
<ul style="list-style-type: none"> <li>• A high number of houses are proposed on the site and coupled with other housing sites in the local area will create urban sprawl that will merge Tyldesley, Mosley Common, Astley, Boothstown, Walkden and Worsley.</li> <li>• The release of a number of smaller Green Belt sites spread around the borough should be considered instead.</li> <li>• Low density housing should be built on site to protect the character of the area.</li> <li>• The allocation could be extended to the north and north east to deliver new homes or safeguarded for future development needs beyond the GMSF plan period.</li> <li>• not all of the dwellings proposed for the site will be built out by 2037 because significant new highways, public transport, drainage and utilities and community facilities infrastructure need to be built.</li> <li>• The site could be built out over ten years.</li> </ul>
<b>Housing (inc affordable housing)</b>
<ul style="list-style-type: none"> <li>• The 2018 Office of National Statistics (ONS) population projections which forecast lower population growth should be used, not the 2016 projections which forecast higher population growth.</li> <li>• Wigan Borough can meet its own housing needs without Green Belt sites based on the 2016 ONS figures and even less using the 2018 ONS figures.</li> <li>• Wigan Borough can meet its GMSF housing requirement on sites in the urban areas by increasing housing densities from 30 dwellings per hectare (dph) to 35 dph.</li> <li>• Wigan Borough should not be accommodating other district's housing needs where they cannot meet their own needs.</li> <li>• A high number of homes are already proposed in the east of the borough and in west of Salford.</li> <li>• How many affordable homes will be built on the site?</li> <li>• Houses on the site will be unaffordable to most people because house prices are high in Tyldesley, Astley and Boothstown.</li> </ul>
<b>Employment and Economy</b>
<ul style="list-style-type: none"> <li>• There are few good employment opportunities in the area.</li> </ul>
<b>Green Belt</b>
<ul style="list-style-type: none"> <li>• The development of the site will result in the loss of a critical Green Belt gap between Tyldesley, Little Hulton and Boothstown - effectively merging these settlements.</li> <li>• Exceptional circumstances that outweigh the harm to Green Belt have not been demonstrated to justify developing the site for housing, especially as Wigan can meet its housing need from sites in the urban area.</li> </ul>

**Brownfield**

- Brownfield sites should be developed before Green Belt sites to deliver new homes in Wigan Borough.
- Wigan Borough can meet its housing need from sites in the urban area.
- 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.

**Transport – Highways / Public Transport / Cycling / Walking**

- The existing road network is already at full capacity at peak times. This proposal together with the other proposed GMSF allocations and existing development commitments in the area will significantly exacerbate congestion.
- Morning car journeys can take over 40 minutes to travel three miles from Mosley Common to the M60 as a significant amount of traffic is traveling eastbound on the A580 towards M60 J13.
- On-street parking on roads in Mosley Common and Tyldesley contribute towards traffic congestion.
- The Mosley Common Road/A580 road junction is narrow and results in vehicles queuing to turn right towards Liverpool, blocking vehicles turning left towards Manchester, which contributes towards traffic congestion.
- 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.
- Significant road infrastructure improvements are required to reduce the severe traffic congestion in the area.
- A traffic impact assessment is required to assess how the GMSF allocations and existing housing sites will affect traffic congestion in the area
- The smart motorway along the M60 will not help to alleviate traffic congestion.
- The allocation policy proposal to improve the A580/ A577 Junction is impossible due to space constraints and would not alleviate congestion in any case.
- 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.
- There are no public transport services to south Manchester and other areas, including Warrington where many local residents work.
- Improving public transport options for the site will not reduce traffic congestion in the area because residents will still use cars to make multiple trips e.g. school runs and shopping trips.
- HS2 will not help the east of Wigan Borough.
- 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 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 area already full at Tyldesley and there is no capacity on the route to increase service provision.
- The Guided Busway appears to be the only reason for selecting the site.
- 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.
- 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.

<b>Physical Infrastructure and utilities</b>
<ul style="list-style-type: none"> <li>The development will have an impact on the electricity, gas and sewer network.</li> </ul>
<b>Social Infrastructure</b>
<ul style="list-style-type: none"> <li>Local schools, GP surgeries and dentists are at full capacity and will not be able to accommodate demand from the site.</li> <li>There is no evidence presented which demonstrates that local schools and healthcare facilities can accommodate additional demand from the site.</li> </ul>
<b>Environmental – Green Infrastructure, Biodiversity, open space</b>
<ul style="list-style-type: none"> <li>Wildlife habitats on the site for variety of species, including protected species, will be lost if development goes ahead.</li> <li>A biodiversity net gain should be implemented on site.</li> <li>Development on the site would have a detrimental impact on the green infrastructure corridor.</li> <li>The recreation value of the site for walking and horse riding along public footpaths and bridleways will be lost.</li> <li>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.</li> </ul>
<b>Air Quality</b>
<ul style="list-style-type: none"> <li>There is a high level of air and noise pollution along the A580, M60 and other local roads. The significant level of traffic that the site will generate will worsen air quality.</li> <li>Increased noise and air pollution will have a negative impact on the health and wellbeing of local people.</li> </ul>
<b>Flood risk</b>
<ul style="list-style-type: none"> <li>Honksford Brook floods regularly and should be protected from development and enhanced.</li> <li>Mort Lane frequently floods and causes traffic congestion.</li> <li>Development of the site will affect the natural drainage and will increase flood risk.</li> <li>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.</li> <li>The site should incorporate natural flood storage measures to reduce flooding downstream in Tyldesley.</li> <li>Sustainable drainage systems should be implemented on site.</li> </ul>
<b>Other</b>
<ul style="list-style-type: none"> <li>More houses in the area will increase crime.</li> <li>New homes should be sensitively designed to take account of the character of the surrounding countryside.</li> <li>The area is poorly served by shops and services and employment opportunities.</li> <li>Loss of privacy and amenity to existing properties adjacent to the site.</li> <li>Part of the site should be reserved for an extension to New Manchester Woodland Cemetery.</li> <li>The site was previously mined for coal. There are numerous mine shafts, and the area is affected by subsidence, including properties on Commonside Road.</li> <li>Farmland on the site will be lost.</li> </ul>
<b>Response to Comments</b>
<p><u>Principle of development:</u> Enough developable land has been identified to enable Wigan to meet its housing target over the period 2020-2037 without the need for further Green Belt release.</p>

Housing:

The number of homes proposed is required to help Wigan meet its housing requirement over the period 2020-2037 and make efficient use of land in accordance with the NPPF. To achieve this, housing development is proposed in locations throughout the borough, either as part of the three GMSF allocations (in Mosley Common, Lowton and Atherton), or as part of the baseline housing supply in locations including Wigan, Standish, Leigh, Ashton and Hindley.

Information about phasing is set out in Section 24 of the Topic Paper. Engagement has taken place with the site promoters and infrastructure providers and there is considered sufficient time to provide any necessary infrastructure to serve the development.

A mix of housing will be developed on the site including market and affordable housing. Affordable housing is defined in national planning policy. In accordance with the current Local Plan Core Strategy Policy CP6, the Council will seek the provision of 25% affordable housing where this is viable, which would equate to approximately 275 affordable homes.

National planning policy requires planning policies and decisions to support the efficient use of land and to achieve appropriate densities. The allocation assumes a 50% net developable area to take account of existing and proposed infrastructure, open space provision and other site constraints. Residential densities of 35-50 dwellings per hectare are proposed, with higher densities close to bus stops on the guided busway. Clause 1 of the allocation Policy requires the development of the site to be in accordance with a masterplan that is agreed by the Council, which will be informed by site constraints to ensure that new homes are designed sensitively in relation to their surroundings.

There is no evidence demonstrating that new homes in an area results in a detrimental impact on crime.

Green Belt:

Section 12 of the Topic Paper provides information on the Green Belt assessment work that has been carried out. Green Belt is retained to the north and east of the allocation site, which ensures that settlements in the locality will not merge. Exceptional circumstances that outweigh the harm to the Green Belt have been demonstrated at both the strategic and local levels that justify the development of this site for housing.

Transport – Highways:

A Locality Assessment has been prepared which demonstrates that the transport impacts of this site allocation can be accommodated on the surrounding highway network without severe impacts. Section 8 of the Topic Paper provides a summary of the findings of this Report.

The Locality Assessment examined the capacity of thirteen junctions within close proximity to the allocation and demonstrated that the majority of these are operating at or exceeding operational capacity both with and without the increased traffic from the GMSF allocations. Mitigation schemes have been developed and tested to address the network congestion impacts on the local road network. The schemes have been shown to mitigate the impact of the allocation trips and to restore the network to a similar state as that found without the GMSF allocations.

Public Transport:

The Guided Busway intersects the allocation. A stop is located off Mosley Common Road, just west of the proposed allocation and one to the east off Newearth Road. The Busway provides a reliable, frequent and attractive journey option to key sites in the Regional Centre. It will provide residents with the opportunity to travel sustainably to reduce congestion on the highway network. Funding will be provided towards the costs of additional guided buses to increase capacity on the route. Residents should have excellent access to busway services without the need to travel to utilise park and ride facilities or to park on local roads.

In addition to the Busway route, a number of other bus routes pass close to the allocation, providing frequent services to Manchester, Salford, Leigh, Bolton, the Trafford Centre and Wigan.

Walkden rail station is located approximately 2km from the allocation, accessed via National Cycle Route 55 (parallel to the Busway), Newearth Road and Park Road, to connect with A575. It serves Manchester Victoria to the east and Wigan to the west.

All sites have been considered consistently against a robust and clear Site Selection methodology, as set out in Section 4 of the Topic Paper.

Physical Infrastructure and utilities:

As set out in Section 11 of the Topic Paper, utilities companies have been consulted on the proposed allocation and not identified any capacity issues that cannot be resolved.

Social Infrastructure:

As set out in clause 8 of the policy, the development will be required to provide new primary education facilities on-site, as a new school and/or as an expansion to St John's Mosley Common Primary School, unless it is determined by the council at the planning application stage that it is not needed. A financial contribution to meet the demand generated by secondary school pupils will also be required.

In terms of health facilities, clause 7 of the policy requires new health facilities on-site, potentially as part of a new local centre, or an equivalent financial contribution as appropriate, to meet additional demand generated by the development

Green Infrastructure:

The site allocation policy requires the protection and enhancement of the environs of Honksford Brook through the creation of a green infrastructure corridor.

Biodiversity:

Section 16 of the Topic Paper provides information on biodiversity in relation to the allocation.

Policy GM-G9 of the GMSF requires developments to achieve a measurable net gain in biodiversity of no less than 10%. Therefore, habitats will need to be retained or enhanced on sites rather than lost. Any planning applications will be required to submit supporting ecological assessments to ensure that the ecological impact of the proposed development is understood and a 10% biodiversity net gain can be achieved.

Open Space:

Clause 6 of the site allocation policy requires the retention and enhancement of existing public rights of way and the creation of new footpaths, including links across the guided busway corridor, where appropriate

Noise and Air Quality:

Sections 19 and 20 of the Topic Paper provide information about noise and air quality in relation to the allocation. Consistent with GMSF policy GM-S 6 Clean Air and the current Local Plan Core Strategy CP 17 Environmental Protection, noise and air quality assessments will be required to be submitted as part of the planning application process.

Flood risk:

As set out in Section 9 of the Topic Paper, a strategic flood risk assessment has concluded that the vast majority of the site is within Flood Zone 1 (low risk) with around 7% within Flood Zone 3 (a 1 in 100 or greater annual probability of river flooding). The area within Flood Zone 3 primarily follows Honksford Brook which is proposed as a green infrastructure corridor in clause 9 of the policy and will not be developed.

Given its size, the site has potential to create significant volumes of runoff if infiltration is not possible, that could place areas downstream at increased risk of flooding. As a result, the policy requires the development of the site to safeguard land for a flood storage area within the environs of Honksford Brook to mitigate this risk.

Other:

Clause 7 of the policy requires the development to provide new community and health facilities on-site, potentially as part of a new local centre, or an equivalent financial contribution as appropriate, to meet additional demand generated by the development. The site is located adjacent to existing employment uses at Parr Brow and also benefits from direct access to the Leigh Guided Busway which provides frequent services into both Leigh and Manchester City Centre for jobs, retail and leisure.

As set out in section 10 of the Topic Paper, a preliminary risk assessment of the site found a number of potential contamination sources associated with previous and current site uses. Taking account of the previous/current uses on the site and the information provided by the preliminary risk assessment, the Council will require development proposals on the site to be supported by a preliminary risk assessment at the planning application stage.

The vast majority of the site allocation is not classified as “best and most versatile” agricultural land, but there are two small isolated areas of Grade 3a agricultural land to the north of the guided busway.

### GM Allocation 50: Pocket Nook (352 comments)

Residents raised the issue that one of the major landowners of the site is unwilling to sell his land for development. Some developers proposing alternative sites suggested that the housing delivery timeframes on the site are too optimistic because they do not consider the construction impact of HS2 that will run through the site.

Some residents thought that Wigan should not be accommodating other district's housing needs where they cannot meet their own needs and that the Wigan Local Plan Core Strategy limits the amount of development in Lowton, but the GMSF is proposing more development in the area.

Other concerns about impact on biodiversity, air pollution, local shops, services, schools and health facilities and loss of farmland.

<p><b>Principle / scale of development</b></p> <ul style="list-style-type: none"> <li>• Some landowners on the site are unwilling to sell their land for development and their land should be removed from the allocation.</li> <li>• Other landowners of the site support the development.</li> <li>• Concerns that land will be compulsory purchased.</li> </ul>
<p><b>Housing (inc affordable housing)</b></p> <ul style="list-style-type: none"> <li>• The Wigan Local Plan Core Strategy limits the amount of development in Lowton, but the GMSF is proposing more development in the area.</li> <li>• The 2018 ONS population projections which forecast lower population growth should be used, not the 2016 projections which forecast higher population growth.</li> <li>• Wigan can meet its own housing needs without needing Green Belt sites based on the 2016 ONS figures and even less sites would be needed to meet the 2018 ONS figures.</li> <li>• Wigan can meet its GMSF requirement on sites in the urban areas by increasing housing densities from 30 dph to 35 dph.</li> <li>• Wigan should not be accommodating other district's housing needs where they cannot meet their own needs and It should not be considered as exceptional circumstances.</li> <li>• Housing targets are not mandatory.</li> <li>• The houses proposed for the site will not be affordable houses and even if a proportion are, they still will not be affordable.</li> <li>• HS2 will delay the timescales for housing delivery within the plan period and more housing sites are therefore required.</li> </ul>
<p><b>Employment and Economy</b></p> <ul style="list-style-type: none"> <li>• There is a too greater emphasis on attracting logistic developments to Wigan. There should be a better balance of businesses.</li> <li>• A better site for employment development would be south of the A580 between the A572 and A572 as it would be closer to Stone Cross Business Park and Newton-Le-Willows Station.</li> <li>• 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.</li> <li>• Wages in the logistics industry are low.</li> <li>• Jobs created in the logistics industry will lost to automation in the future.</li> </ul>
<p><b>Green Belt</b></p> <ul style="list-style-type: none"> <li>• Development on the site would result in the loss of Green Belt which would merge Golborne, Lowton and Leigh and change the character of the area.</li> </ul>



<ul style="list-style-type: none"> <li>• Infrastructure to provide guided busway services to the site would have a detrimental impact on the retained Green Belt between the site and Pennington.</li> <li>• No exceptional circumstances have been demonstrated that outweigh the harm to Green Belt when the National Planning Policy Framework states that local authorities should show fully evidenced justification for a Green Belt boundary change.</li> <li>• Putting Leigh Sewage Works into Green Belt serves no Green Belt purpose and has only been done to make it appear that less Green Belt is proposed for development overall.</li> </ul>
<p><b>Brownfield</b></p>
<ul style="list-style-type: none"> <li>• Empty business units should be used for new employment development.</li> <li>• Brownfield sites should be used first before considering greenfield sites.</li> </ul>
<p><b>Transport – Highways / Public Transport / Cycling / Walking</b></p>
<ul style="list-style-type: none"> <li>• The existing road network is already at full capacity at peak times, particularly the A580 East Lancashire Road, A579 Atherleigh Way and Newton Road. This proposal together with the other proposed GMSF allocations and existing development commitments in the area will significantly exacerbate congestion.</li> <li>• Creating another junction on the A579 to access the site will increase traffic congestion.</li> <li>• It is feasible to create a junction to access the site from the A579.</li> <li>• Pocket Nook Lane should not be used to access the site because it too narrow.</li> <li>• Pocket Nook Lane could be used to access part of the site if it was widened.</li> <li>• Concerns over the requirement for a bridge over the HS2 including whether there is a need for it, the impact it would have on the maintenance and access arrangements for the HS2 line and the funding for it.</li> <li>• Improving traffic congestion on the A580 should be a priority considering it is the main non-motorway route between Manchester and Liverpool.</li> <li>• There are no safe separated cycle lanes in the area.</li> <li>• Improvements to public transport should be made before any further development in the area commences.</li> <li>• The area is poorly served by buses and there are no direct buses to Warrington, Bolton, Manchester or Liverpool.</li> <li>• An extension to the guided busway services along Beach Walk is inappropriate because the road is narrow, suffers from potholes, is congested at peak times and trees along the road are subject to TPOs. It would also harm the amenity of properties along the road.</li> <li>• The extension to the guided busway services should be along the A580 not Beech Walk.</li> <li>• Not all people work in Manchester and rapid public transport options are required for people living in Leigh, Golborne and Lowton to travel to Liverpool, Warrington, Manchester Airport and Trafford Park which are major employment destinations.</li> <li>• Leigh needs a train station.</li> <li>• HS2 is uncertain.</li> </ul>
<p><b>Physical Infrastructure and utilities</b></p>
<ul style="list-style-type: none"> <li>• The development will have an impact on the electricity, gas and sewer network.</li> </ul>
<p><b>Social Infrastructure</b></p>
<ul style="list-style-type: none"> <li>• Local schools, GP surgeries and dentists are at full capacity and will not be able to accommodate demand from the site.</li> <li>• There is no evidence presented which demonstrates that local schools and healthcare facilities can accommodate additional demand from the site.</li> </ul>
<p><b>Environmental – Green Infrastructure, Biodiversity, open space</b></p>
<ul style="list-style-type: none"> <li>• Wildlife habitats on the site for variety of species, including protected species, will be lost if development goes ahead.</li> </ul>

<ul style="list-style-type: none"> <li>• A biodiversity net gain should be implemented on site.</li> <li>• Development on the site would have a detrimental impact on the wildlife corridor.</li> <li>• The recreation value of the site for walking along public footpaths will be lost.</li> </ul>
<p><b>Air Quality</b></p> <ul style="list-style-type: none"> <li>• There is a high level of air and noise pollution along the A580. The significant level of traffic that the site will generate will worsen air quality.</li> <li>• Increased noise and air pollution will have a negative impact on the health and wellbeing of local people.</li> </ul>
<p><b>Flood risk</b></p> <ul style="list-style-type: none"> <li>• Part of the site is at risk of flooding and new development on the site will make the issue worse.</li> <li>• Sustainable drainage systems should be implemented on site.</li> <li>• Carr Brook should be protected from development and enhanced as a green infrastructure.</li> </ul>
<p><b>Other</b></p> <ul style="list-style-type: none"> <li>• Farmland on the site will be lost.</li> <li>• Pipelines run underneath the site and require easements.</li> <li>• Groundwater Source Protection Zones exist on the site and development should avoid Source Protection Zone 1.</li> </ul>
<p><b>Response to Comments</b></p> <p><u>Principle of development:</u></p> <p>The principle of development at Pocket Nook, which is not in the Green Belt, is established in Policy SP4 of the Local Plan Core Strategy which identifies it within a broad location for new development.</p> <p>The unwilling landowner owns a strategic part of the site. Removing this from the allocation would jeopardise the delivery of the proposed through road which will enhance traffic flow and help to mitigate congestion in the area. A notable proportion of the unwilling landowner’s land is likely to be compulsory purchased by the Government to facilitate the delivery of High Speed 2. The Council also has CPO powers within its remit to facilitate, if necessary, the wider comprehensive development of this site. However, the use of CPO powers will be a last resort and only used if an alternative resolution cannot be found.</p> <p><u>Housing:</u></p> <p>As a successor document, the GMSF is not required to be in accordance with the policy framework set in the Wigan Local Plan Core Strategy. Whilst Policy SP4 of the Local Plan Core Strategy, which permits approximately 1,000 homes on safeguarded land in Golborne and Lowton, is proposed to be saved until replaced by a future Wigan Local Plan, a 2017 appeal decision in favour of residential development on safeguarded land in Standish, concluded that the 1,000 figure has limited weight and should not restrict sustainable development which is in accordance with the development plan as a whole.</p> <p>The delivery of 600 homes on the site will make an important contribution to meeting housing needs in the borough. Not delivering the site would require the release of additional Green Belt, either in the borough or elsewhere in Greater Manchester.</p> <p>Affordable housing requirements are set out in local planning policy, not the GMSF. Policy CP6 of the Local Plan Core Strategy seek the provision of 25% affordable housing</p>

on sites of 10 or more homes, where this is viable. For a scheme of 600 homes, this would equate to around 150 affordable homes.

HS2 proposals will inevitably influence the delivery and phasing of development on part of the site. The western part of the allocation is proposed as a construction compound for HS2, which is scheduled to be operational until 2028. This will restrict the delivery of the employment development and some housing close to the HS2 line, until the later phases of the plan period. As with all major infrastructure development, there is a risk of slippage in delivery timescales which may also have an impact.

#### Green Belt:

Pocket Nook is not within the Green Belt. Exceptional circumstances therefore do not need to be demonstrated.

#### Brownfield:

Prioritising the use of brownfield land to meet development needs is a key objective of the GMSF as set out in the strategic objectives and Policy GM-S1. All known brownfield sites within the borough that are deemed suitable and deliverable for residential development are included within the borough's housing land supply. However, there is simply not enough deliverable brownfield sites in the borough to meet identified needs, particularly in the short term, due to associated viability issues on some previously developed sites such as contamination, often as a result of their industrial or mining legacy.

#### Transport – Highways:

The Locality Assessment has assessed the impact of the proposed development on the local highway network, including the capacity of ten junctions close to the allocation, and concludes that the proposed development is acceptable in highway terms.

A through road connecting the A579 Atherleigh Way to Newton Road via Enterprise Way is considered the most effective means of accessing the site, which will bring benefits in terms of integration with the existing settlement, the ability for the development to be served by bus services, and the alleviation of traffic congestion on the existing highway network within Lowton. Access to the site, or part of the site, from Pocket Nook Lane is not envisaged or a requirement of the policy. It would require the bridging of Carr Brook and the widening of Pocket Nook Lane, which could have ecological and highway impacts that would need to be addressed at the planning application stage.

#### Public transport:

As set out in the Greater Manchester 2040 Transport Strategy, whilst the area is poorly served by public transport, there is an opportunity to provide connecting services to the Leigh Guided Busway, via Pocket Nook, to enhance public transport accessibility.

The TfGM New Rail Station Study has also identified the need for a new rail station in the area, which, if delivered, would provide regular services between Wigan and Manchester.

Bus Service 34, operated by Arriva, operates along Newton Road, providing the allocation with an important connection to Newton-le-Willows rail station, offering interchange to destinations such as Manchester Airport, Liverpool, Warrington, Chester and Leeds.

Land South of Pennington is no longer proposed to be released from the Green Belt for employment uses. New bus infrastructure to connect Pocket Nook with guided busway services will therefore use the existing road network rather than Green Belt land.

Utilities:

As set out in Section 11 of the Topic Paper, utility companies have not expressed any concern at the development of the site, however early engagement with prospective developers in the masterplanning of the entire site is to be encouraged.

Social infrastructure:

Consultation with education and health providers has confirmed that new provision is not required within the allocation to address local needs. However, developers will be required to make an appropriate financial contribution, through a planning obligation or planning condition, based on an analysis of need at the planning application stage, to mitigate any education and/or health needs arising from the development.

Environmental:

New developments will be required to secure a 10% biodiversity net gain, in line with GMSF Policies GM-G 2 and GM-G 10 and Local Plan Core Strategy Policy CP9.

In line with Environment Agency advice, clause 7 of the site allocation policy requires development of the site to protect and enhance the environs of Carr Brook through the creation of a green infrastructure corridor.

Clause 6 supports the retention or rerouting of existing public footpaths within the site to ensure safe and convenient access for pedestrians and cyclists to local services and adjoining green spaces.

Noise and air quality:

Proposed developments will need to be supported by noise and air quality assessments in accordance with GMSF policy GM-S 6 and Local Plan Core Strategy CP17.

Flood risk:

The northern boundary of the site has been redrawn to reflect existing development proposals together with identified water courses, drainage and flood zones. This omits areas at risk of flooding. Clause 7 also requires the protection and enhancement of Carr Brook through the creation of a green infrastructure corridor. The use of SuDS is promoted through GMSF Policy GM-S5.

Other:

Policy CP 17 of the Local Plan Core Strategy seeks to protecting our 'best and most versatile' agricultural land from irreversible loss. However, based on Agricultural Land Classification mapping from Natural England, there is no evidence to suggest that the farmland at Pocket Nook is best and most versatile. Three Groundwater Source Protection Zones have been identified either within or immediately adjacent to the northern boundary of the site. Clause 8 of the policy requires developers to ensure that groundwater resources are not jeopardised through the construction process or uses thereafter.

**GM Allocation 51: West of Gibfield** (70 comments)

Similar to the comments received on Pocket Nook and North of Mosley Common, residents thought that the housing requirement is too high because the 2018 ONS population projections should be used, being the most up-to-date and indicate a lower population growth. People also thought that previously developed sites and empty properties should be used first before considering sites in Green Belt.

People thought that the site and the other nearby large development sites in Bolton will result in significant urban sprawl, merging Atherton and Westhoughton.

The allocation policy requires the creation of a country park and some residents were sceptical about whether this would materialise as a similar proposal to create a country park had been proposed in the past but never happened because the developer went out of business.

Other concerns about impact on road network, biodiversity, air pollution, local shops, services, schools and health facilities and loss of farmland.

<b>Principle / scale of development</b>
<ul style="list-style-type: none"> <li>• The extent to which development on site should contribute towards the funding of the M61 link road is unclear.</li> <li>• The site could start to deliver dwellings in 2022 and be built out in two phases over around a 13 year period.</li> <li>• There is the potential to extend the allocation the west to deliver more homes.</li> </ul>
<b>Housing (inc affordable housing)</b>
<ul style="list-style-type: none"> <li>• The 2018 Office of National Statistics (ONS) population projections which forecast lower population growth should be used, not the 2016 projections which forecast higher population growth.</li> <li>• Brexit will reduce immigration, therefore less housing is required in Wigan.</li> <li>• Wigan can meet its own housing need without the need to build on Green Belt.</li> <li>• A disproportionately high number of homes are proposed in the Atherton area compared to the rest of Wigan Borough.</li> <li>• There is a considerable amount of housing already proposed and under construction in Wigan Borough.</li> <li>• There are many homes for sale in the area.</li> <li>• Serviced apartments for the over 65s should be built instead of bungalows which will reduce land take.</li> <li>• More affordable homes should be built on the site.</li> </ul>
<b>Employment and Economy</b>
<ul style="list-style-type: none"> <li>• 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.</li> <li>• The site is a long way from the motorway network and would not be attractive to logistics development.</li> </ul>
<b>Green Belt</b>
<ul style="list-style-type: none"> <li>• The site and the other nearby large development sites in Bolton will result in significant urban sprawl, merging Atherton and Westhoughton.</li> <li>• A disproportionately large amount of Green Belt and greenspace will be lost around Westhoughton and Atherton compared to other areas in Greater Manchester.</li> <li>• The proposal is sensible and sustainable urban extension that retains the gap between Gibfield and Westhoughton.</li> </ul>
<b>Brownfield</b>
<ul style="list-style-type: none"> <li>• Brownfield sites in the urban area should be developed instead of Green Belt sites.</li> </ul>

<ul style="list-style-type: none"> <li>• 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.</li> </ul>
<p><b>Transport – Highways / Public Transport / Cycling / Walking</b></p> <ul style="list-style-type: none"> <li>• The existing road network is already at 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.</li> <li>• More traffic will increase the risk of traffic accidents and delay the response time of emergency services.</li> <li>• The additional traffic will make pot holes in the local roads worse.</li> <li>• Off road parking should be provided for residents.</li> <li>• 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.</li> <li>• The impact on traffic flows that the proposed link road will have on the M61 needs to be assessed.</li> <li>• Chequerbent Roundabout would need to be upgraded to accommodate increased traffic flows using the new link road and from large new developments such as Hulton Park.</li> <li>• The traffic congestion impacts will be widespread and will be felt on the A580 and M60.</li> <li>• The proposals to upgrade the rail infrastructure and services on the Atherton line are welcome.</li> <li>• 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.</li> <li>• How would the proposal impact on Daisy Hill Station?</li> <li>• New bus services should be introduced to service the development.</li> </ul>
<p><b>Physical Infrastructure and utilities</b></p> <ul style="list-style-type: none"> <li>• The development will have an impact on the electricity, gas and sewer network.</li> <li>• A gas pipeline runs through the site.</li> <li>• Ground conditions are poor on the site because it was previously used to store mining spoil.</li> </ul>
<p><b>Social Infrastructure</b></p> <ul style="list-style-type: none"> <li>• Local schools, GP surgeries and dentists are at full capacity and will not be able to accommodate demand from the site.</li> <li>• There is no evidence presented which demonstrates that local schools and healthcare facilities can accommodate additional demand from the site.</li> </ul>
<p><b>Environmental – Green Infrastructure, Biodiversity, open space</b></p> <ul style="list-style-type: none"> <li>• The development will result in the loss of wildlife habitats, some of which are protected, and which serve as mitigation for earlier development proposals to the east of the site.</li> <li>• The development would sever the wildlife corridor on the site that extends into the wider area.</li> <li>• A biodiversity net gain should be implemented on site.</li> <li>• The Site of Biological Interest (SBI) on the site should be protected from development.</li> <li>• The proposal will result in the loss of open land used for recreation, e.g. walking, dog-walking and fishing.</li> <li>• There should be a green buffer between the development and existing houses.</li> <li>• Public rights of way across the site should be retained.</li> </ul>

<ul style="list-style-type: none"> <li>• 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.</li> <li>• Where will new open space provision be located on the site?</li> <li>• New open space provision on the site will not be as good for recreation as the open fields that will be lost.</li> </ul>
<p><b>Air Quality</b></p> <ul style="list-style-type: none"> <li>• 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.</li> <li>• The new link road will increase noise pollution.</li> </ul>
<p><b>Flood risk</b></p> <ul style="list-style-type: none"> <li>• Part of the site is at risk of flooding and should be protected from development.</li> <li>• Sustainable drainage systems should be implemented on site and referred to in the allocation policy.</li> </ul>
<p><b>Heritage</b></p> <ul style="list-style-type: none"> <li>• Concerns about the merging of historic towns of Atherton and Westhoughton.</li> </ul>
<p><b>Other</b></p> <ul style="list-style-type: none"> <li>• 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.</li> <li>• More houses in the area will increase crime.</li> <li>• The views across the fields will be lost.</li> <li>• The residential amenity and privacy of residents living adjacent to the proposed development will be affected. Privacy distances need to be increased.</li> <li>• Loss of property values in the area, particularly houses that are adjacent to the site.</li> <li>• Farmland will be lost.</li> <li>• A letter should have been posted to all residents in the area.</li> </ul>
<p><b>Response to Comments</b></p> <p><u>Housing:</u></p> <p>Approximately one seventh of the borough's housing land supply to 2037 is in the Atherton area (Atherton and Atherleigh Wards combined). This is a higher proportion than some other areas in the borough but by no means disproportionate. New residential development in Atherton benefits from good rail access on the Wigan-Manchester line and will contribute to the regeneration of the area forming part of the Wigan-Bolton growth corridor identified in Policy GM-Strat 8. The area also has a number of large deliverable sites that are outside the Green Belt (including South of Atherton and East of Atherton) that are safeguarded for future development in the adopted development plan, and will make a notable contribution towards meeting identified housing needs whilst reducing Green Belt release.</p> <p>Prioritising the development of brownfield sites and the reuse of vacant buildings is a key objective of the GMSF as set out in Policy GM-S1. Homes for sale in an area does not reflect low demand but represents churn which is important for a healthy housing market.</p> <p>25% affordable housing will be required in accordance with Local Plan Core Strategy CP6, subject to viability.</p> <p><u>Employment and economy:</u></p> <p>The GMSF proposes a substantial mixed-use development of the site, comprising around 500 homes and 45,500 sqm of B1, B2 and/or B8 employment floorspace. The</p>

employment development will be delivered in the south east of the allocation as a logical extension to the existing employment area at Gibfield Park. It is envisaged that this will consist predominantly of light industrial uses, not logistics uses which tend to require larger plots to what will be available.

Green Belt:

As set out in Section 12 of the Topic Paper, the 2020 Green Belt Harm assessment concludes that the release of the allocation would weaken the Green Belt boundary and significantly reduce the connectivity of adjacent retained Green Belt by narrowing the Green Belt gap between Atherton and Westhoughton to the north of the allocation. Harm to the Green Belt purposes is not considered as significant in the southern and central parts of the site. Despite this, it is the council's view that the development will bring significant benefits, as set out in the Topic Paper, that will significantly outweigh its harm and represent exceptional circumstances in accordance with national planning policy. A significant proportion of the allocation is to be retained within the Green Belt and developed as a country park.

Transport – Highways:

The Locality Assessment has assessed the impact of the proposed development on the local highway network and concludes that the proposed development is acceptable in highway terms, subject to mitigation measures. This is covered in clause 5 of the policy. The policy also requires the development to safeguard sufficient land to allow for a potential future extension of Gibfield Park Way northwards to the M61.

The transport study suggests the traffic generated by the West of Gibfield may travel to the A580 East Lancashire Road and M60, however, the traffic impact is low and there is no discernible effect on the performance of the strategic sections of highway.

There is no evidence to suggest that the traffic generated by West of Gibfield and all other GMSF allocations will increase the risk of traffic accidents and delay the response time of emergency services.

Parking will be provided in accordance with local planning policy.

Public transport:

Much of the allocation is within an easy walking distance of existing bus stops which provide frequent services to a range of destinations within both the local area and beyond to Wigan, Leigh and Bolton. The V2 service from Atherton provides frequent and fast services to Manchester city centre. The need for any diversions or improvements to existing bus services can be explored further at the time the proposals are brought forward for development.

The Greater Manchester 2040 Transport Strategy details proposals to increase the frequency of services on the Wigan – Manchester railway line (serving Daisy Hill and Atherton) to four trains per hour in the peak periods. These will provide significant enhancements to existing rail services, providing frequent services to the regional centre from the allocation. In addition, there are prospects for 'tram-train' services on the line with potential further frequency increases.

The car parks at Atherton and Westhoughton rail stations should not be impacted by the allocation. The policy requires the development to provide safe and convenient access for pedestrians and cyclists to Daisy Hill and Hag Fold rail stations.



Physical Infrastructure and utilities:

As set out in Section 11 of the Topic Paper, utilities companies have been consulted on the proposed allocation and not identified any capacity issues, just requiring sufficient easements to protect utility infrastructure. This is covered in clause 10 of the policy.

As set out in Section 10 of the Topic Paper, a preliminary risk assessment of the site, undertaken by LKC on behalf of the site promoter, identified a high gas risk on the site and some low to moderate risks relating to contamination. However, LKC concluded that the assessment provided sufficient information to allow the validation of any future planning application and for conditional planning approval to be granted.

Social Infrastructure:

Consultation with education and health providers has confirmed that new provision is not required within the allocation to address local needs. However, developers will be required to make an appropriate financial contribution, through a planning obligation or planning condition, based on an analysis of need at the planning application stage, to mitigate any education and/or health needs arising from the development.

Green Infrastructure and open space:

As set out in clause 8 of the policy, the development will provide a substantive accessible green infrastructure corridor and country park on land remaining in the Green Belt within the allocation, and ensure ongoing arrangements for its maintenance, agreed with the Council. The delivery of the country park will provide enhanced and accessible recreation opportunities within the area, benefitting the health and wellbeing of local residents.

Public footpaths will be retained or rerouted to ensure safe and convenient access to pedestrian and cyclists to bus and rail services.

Biodiversity:

The delivery of the country park will make a notable contribution to the requirement for achieving at least a 10% biodiversity net gain from the development.

As set out in Section 16 of the Topic Paper, an Ecological Assessment of the site undertaken by TEP on behalf of the site promoters identified that the site contains a number of different habitats varying in quality. These include wildlife corridors, ponds and acid grassland, which will need to be carefully considered as part of the site's development. As such, any development within these areas will need to be supported by a range of ecological surveys at the masterplanning and planning application stage.

Noise and Air Quality:

A Baseline Air Quality Assessment and a Strategic Environmental Noise Review have been undertaken by specialist consultants on behalf of the site promoter. These recommend that any future planning application for the site will need to be supported by detailed air quality and acoustic assessments to ensure that appropriate mitigation measures are implemented as required.

Flood Risk:

The Drainage and Flood Risk Appraisal confirms that the site is located almost entirely within Flood Zone 1. The majority of the land has a low probability of flooding. A small area of former colliery land to the west adjacent to Lower Leigh Road has a higher risk of flooding (Flood Zone 2 and 3), but this land is excluded from the proposed development

area and will form part of the proposed Country Park. The use of SuDS is promoted through GMSF Policy GMS-5.

Other:

Clause 1 of the revised policy requires the development of the site to be in accordance with a masterplan that has been approved by the council. This will ensure a co-ordinated approach to the development and ensure that the design and layout takes account of key constraints and opportunities presented by the site and incorporates mitigation measures that are required in terms of issues such as green space, landscaping, air quality and noise.

The site is not intensively farmed and is generally of low quality having limited agricultural yield. The Agricultural Land Classification reveals that the site does not contain “Best and Most Versatile” Farmland.

There is no evidence demonstrating that new homes in an area results in a detrimental impact on crime.

## Further comments on the overall proposals for Wigan, including strategic transport interventions (123 comments)

<p><b>Principle / scale of development</b></p> <ul style="list-style-type: none"> <li>Wigan has fewer GMSF development allocations than other districts of Greater Manchester.</li> <li>Too much development is proposed in the east of Wigan Borough compared to the west.</li> <li>Some landowners on the proposed allocations at South of Pennington and Pocket Nook will not sell their land for development.</li> </ul>
<p><b>Housing (inc affordable housing)</b></p> <ul style="list-style-type: none"> <li>The 2018 Office of National Statistics (ONS) population projections which forecast lower population growth should be used, not the 2016 projections which forecast higher population growth.</li> <li>Wigan Borough can meet its own housing needs without Green Belt sites.</li> <li>Wigan Borough can meet its GMSF housing requirement on sites in the urban areas by increasing housing densities from 30 dwellings per hectare (dph) to 35 dph.</li> <li>Wigan Borough should not be accommodating other district's housing needs where they cannot meet their own needs.</li> <li>The Wigan Local Plan Core Strategy limits the amount of development in Lowton, but the GMSF is proposing more development in the area.</li> <li>Many of the brownfield housing sites in the borough are undeliverable and new housing sites in Green Belt are required.</li> <li>A high number of homes are already proposed in the east of the borough and in west of Salford.</li> </ul>
<p><b>Employment and Economy</b></p> <ul style="list-style-type: none"> <li>Quality jobs in the digital industry should be promoted in Wigan rather warehouse type jobs in the logistics industry that are likely to become automated in the future.</li> <li>Many jobs have been lost in Leigh because of poor public transport options.</li> <li>A significant amount of warehousing is under construction and proposed in St. Helen's Borough, which means there is likely to be less demand along the A580 in Wigan Borough.</li> <li>An 'all-ways' M6 Junction 25 is required to accommodate the vehicle movements associated with the GMSF allocation at this junction, but if proposed, it is likely that it would be built after the allocation is developed.</li> <li>Why was the proposed employment allocation at M6 Junction 26 removed from the GMSF? It is a better site than Junction 25 because it has an 'all-ways' junction, closer the M58 and more visible from the motorway.</li> </ul>
<p><b>Green Belt</b></p> <ul style="list-style-type: none"> <li>Exceptional circumstances that outweigh the harm to Green Belt have not been demonstrated to justify releasing Green Belt land for development.</li> </ul>
<p><b>Brownfield</b></p> <ul style="list-style-type: none"> <li>Brownfield sites and derelict properties should be developed before Green Belt sites to deliver new homes in Wigan Borough.</li> <li>Wigan Borough can meet its housing need from sites in the urban area.</li> <li>More land is proposed for Green Belt release in Wigan than any other Greater Manchester district.</li> <li>There is no evidence in the GMSF to demonstrate that previously developed sites and vacant properties have been searched for.</li> </ul>
<p><b>Transport – Highways / Public Transport / Cycling / Walking</b></p>

<ul style="list-style-type: none"> <li>• The existing road network in Wigan is already at full capacity at peak times. The GMSF allocations and existing development commitments in the borough will significantly exacerbate congestion.</li> <li>• The car parks at train stations are full and trains are full at peak times and are old.</li> <li>• Leigh suffers from poor accessibility which limits opportunities to quality jobs and education facilities for local residents. The town needs a train station.</li> <li>• Improvements to the junctions along the A580 in Lowton have not been implemented despite new housing being permitted and constructed in Lowton.</li> <li>• Wigan needs a full network of connected cycle and pedestrian routes around the borough, which also connect into other local authority areas.</li> <li>• Bus services have been reduced which has a negative impact on school journeys.</li> <li>• Public transport connections in Wigan Borough should connect and be co-ordinated with public transport connections in Warrington e.g. Newton-Le-Willows train station.</li> <li>• Many of the transport interventions in the Greater Manchester Transport Strategy will not be built until after 2040.</li> </ul>
<p><b>Physical Infrastructure and utilities</b></p> <ul style="list-style-type: none"> <li>• New development will have an impact on the electricity, gas and sewer network.</li> </ul>
<p><b>Social Infrastructure</b></p> <ul style="list-style-type: none"> <li>• Local schools, GP surgeries and dentists are at full capacity and will not be able to accommodate demand from the site.</li> <li>• There is no evidence presented which demonstrates that local schools and healthcare facilities can accommodate additional demand from the site.</li> </ul>
<p><b>Environmental – Green Infrastructure, Biodiversity, open space</b></p> <ul style="list-style-type: none"> <li>• Wildlife habitats on the GMSF proposed development sites will be lost if development goes ahead.</li> </ul>
<p><b>Air Quality</b></p> <ul style="list-style-type: none"> <li>• There is a high level of air and noise pollution along the A580, M60 and other local roads. The significant level of traffic that the site will generate will worsen air quality.</li> </ul>
<p><b>Other</b></p> <ul style="list-style-type: none"> <li>• Concerns about the transparency the GMSF process.</li> <li>• The increase in development, air pollution, traffic, noise, impact on health and education facilities and loss of greenspace will have a negative impact on the health and wellbeing of local residents.</li> </ul>
<p><b>Response to comments</b></p> <p><u>Principle of development:</u></p> <p>Four GMSF allocations are proposed in Wigan. Combined with its baseline housing and employment land supply sufficient land has been identified to enable Wigan to meet housing and employment needs. Housing and employment development is proposed in locations throughout the borough, either as part of the GMSF allocations at Mosley Common, Lowton, Atherton and Junction 25 of the M6, or as part of the baseline housing supply in locations including Wigan, Standish, Leigh, Ashton and Hindley.</p> <p>Land South of Pennington is no longer proposed to be released from the Green Belt for employment uses because of concerns over its deliverability due to land ownership constraints.</p> <p>The principle of development at Pocket Nook, which is not in the Green Belt, is established in Policy SP4 of the Local Plan Core Strategy which identifies it within a broad location for new development. The unwilling landowner owns a strategic part of the site.</p>

Removing this from the allocation would jeopardise the delivery of the proposed through road which will enhance traffic flow and help to mitigate congestion in the area. A notable proportion of the unwilling landowner's land is likely to be compulsory purchased by the Government to facilitate the delivery of High Speed 2. Not delivering the site would require the release of additional Green Belt, either in the borough or elsewhere in Greater Manchester to compensate.

Housing:

The housing need figure used in the GMSF 2020 has been derived using the Government's standard methodology for calculating local housing need. Greater Manchester authorities have decided to share this total housing need figure between the districts based on the overall spatial strategy in the GMSF. Through this process individual housing targets for each of the ten districts have been identified and sufficient deliverable land has been identified to meet the overall need of Greater Manchester and to deliver the overall strategy. As a successor document, the GMSF is not required to be in accordance with the policy framework set in the Wigan Local Plan Core Strategy.

The GMSF sets out a very clear preference of using previously developed land and vacant buildings to meet development needs. However, identified housing needs to 2037 cannot be met without the release of some Green Belt and greenfield land for housing. Within Wigan both brownfield and greenfield land has been identified in the baseline housing supply and all of the sites have been assessed to ensure that they are deliverable, or developable. In addition, the GMSF applies a buffer of more than 15% to the land supply over the plan period to provide flexibility and to take account of sites in the early years that may face challenges due to their brownfield nature. Sufficient housing land has been identified to enable Wigan to meet its housing target over the period 2020-2037.

The GMSF seeks to use land as efficiently as possible and as such it introduces a density policy which properly seeks to deliver higher density development in the most sustainable locations. A minimum net residential density of 35 dwellings per hectare is proposed. However, lower densities may be acceptable on some sites due to the local housing market, or site-specific factors.

Employment and Economy:

The GMSF makes land available for new offices as well as new industrial and warehousing developments. Wigan is projected to continue to see a decline in the number of people working in traditional industries over the life of the GMSF plan and there is a real need to diversify the local economy to accommodate other sectors such as logistics and distribution uses. The logistics and distribution sector continues to expand and the M6, the A580 and the M61 are strategically important growth corridors that can facilitate this expansion successfully.

The proposed employment allocation at M6 Junction 26 was removed from the GMSF due to doubts over its deliverability due to land ownership constraints. The current planning application at M6 Junction 25 demonstrates that the site is available and deliverable in the short to medium term to generate new investment, employment and training opportunities for Wigan. The site allocation policy for M6 Junction 25 safeguards land to facilitate the potential future provision of an all-ways junction.

Green Belt:

Exceptional circumstances that outweigh the harm to the Green Belt have been demonstrated on a strategic and local level that justify the release of Green Belt land in Wigan.

### Brownfield

The GMSF sets out a very clear preference of using brownfield land and vacant buildings to meet development needs. The Wigan baseline housing supply is informed by the Strategic Housing Land Availability Assessment, which involves a rigorous site selection process considering both brownfield and greenfield sites. However, housing sites must be developable over the plan period and identified housing needs to 2037 cannot be met without the release of some greenfield land for housing. Green Belt is proposed for release in locations all over Greater Manchester and the level of release in Wigan is not considered disproportionate and is necessary to meet development needs.

### Transport:

The Locality Assessments for the four proposed site allocations in the borough assess the impact of the proposed developments on the local highway network, taking into account the baseline housing supply sites, and all conclude that the proposed allocations are acceptable in highway terms, subject to mitigation measures. The A580 carries a significant volume of traffic to and from the Regional Centre. The junction modelling work undertaken indicates that each of the junctions along the corridor is operating under considerable stress by 2040 and it is anticipated that a strategic corridor based approach to improving the operation of the junctions will be required. These conclusions are reflected in the site allocation policies and the policies in the Our Integrated Network section of the GMSF, as appropriate.

Greater Manchester has ambitious plans to develop the Bee Network - the UK's largest cycling and walking network - and the Combined Authority has allocated £160m between 2018-2022 to fund its first phase. At its core is a programme of new and upgraded pedestrian and cycling crossing points of major roads and other sources of severance. These are connected by a network of signed cycling and walking routes known as Beeways on existing quiet streets. These will be complemented by a number of routes on busier roads where Dutch style cycle lanes protected from motor traffic will be constructed.

Strategic Outline Business Cases for new rail stations in Golborne, Chat Moss and Little Hulton are being prepared by TfGM. If delivered, the introduction of new rail stations will help to support growth and reduce congestion in Wigan.

The Council, in conjunction with TfGM, will continue to explore the possibility of expanding park and ride provision in Wigan Borough, and to manage existing parking at stations/stops to ensure maximum availability of spaces for public transport users.

Greater Manchester is set to benefit from major Network Rail investment in the 'Northern Hub', which will increase capacity and allow more services to operate across the northern network focusing on central Manchester. The Government has recently confirmed its commitment to HS2, including Phase 2B. In order to work out how best to deliver Northern Powerhouse Rail and Phase 2b more effectively, the Government has committed to draw up an integrated plan for rail in the North, informed by an assessment from the National Infrastructure Commission.

As detailed in the Greater Manchester Transport Strategy 2040, the vision is to develop a modern low-emission accessible bus system, fully integrated with the wider Greater Manchester transport network on which everyone will be happy to travel regardless of their background or mobility level.

The Delivery Plan (2020 – 2025) sets out practical actions planned to deliver the Greater Manchester Transport Strategy 2040 and provide a coordinated approach to transport investment. It has been prepared in parallel with the GMSF. Together these documents demonstrate an integrated approach to transport and land use planning by identifying the strategic transport interventions required to deliver growth. This Delivery Plan fully aligns with the new GMSF. In particular, it demonstrates a clear plan for delivering strategic transport interventions for the first five years of the GMSF plan period. This Delivery Plan also lays the foundations in order to achieve the needs of the remainder of the GMSF plan period.

#### Physical Infrastructure and utilities:

Proposed development will be supported by necessary infrastructure including the provision of utilities as required. Utilities companies have been consulted on the proposed allocations and not identified any capacity issues that cannot be resolved.

#### Social Infrastructure

Consultation has taken place with education and health providers. Where appropriate, housing developments will be required to make a financial contribution to the provision of social infrastructure and/or set land aside land for new facilities, proportionate to the additional demand that they would generate.

#### Environmental: Biodiversity

Policy GM-G9 of the GMSF requires developments to achieve a measurable net gain in biodiversity of no less than 10%. Therefore, habitats will need to be retained or enhanced on sites rather than lost. Any planning applications will be required to submit supporting ecological assessments to ensure that the ecological impact of the proposed development is understood and a 10% biodiversity net gain can be achieved.

#### Air Quality:

Policy GMS-6 of the GMSF includes a variety of measures to reduce the potential impacts of new development on air quality. In Wigan proposed developments will need to be supported by air quality assessments in accordance with GMSF policy GM-S 6 and Local Plan Core Strategy CP17, where appropriate.

#### Other:

The GMSF is supported by a wealth of publicly available evidence to demonstrate how policies have developed and the justification for new development proposals. Engagement with stakeholders, including local residents, is in accordance with district's Statements of Community Involvement, which are in compliance with national legislation.

The GMSF has a comprehensive range of policies which aim to protect and improve local environments. New developments will be rigorously assessed to ensure they satisfy the high standards of planning policies in delivering higher quality development and in minimising adverse impacts.

### 3.3. Further comments

A further 873 comments were received on the overall proposals (including strategic transport intervention)

<b>Principle / scale of development</b>
<ul style="list-style-type: none"> <li>The plan should use the latest 2016 housing forecasts instead of the higher 2014 forecast and should cover a 15-year timeframe rather than 20 years; if it did, there would be enough land available without releasing Green Belt.</li> </ul>
<b>Housing</b>
<ul style="list-style-type: none"> <li>No confidence in the government's methodology used for projecting future housing growth</li> <li>Instead of building flats and apartments which are being bought by foreign investors, why are we not prioritising local need?</li> <li>Perhaps we should be asking how sustainable global human population growth is rather than how we can expand our towns and cities.</li> </ul>
<b>Employment and Economy</b>
<ul style="list-style-type: none"> <li>Economic growth projections with the uncertainty of Brexit and other Western World growth challenges cannot reasonably be confidently accepted at the levels suggested in this plan. Therefore, significantly less land needs to be released for the 'jobs' element of the plan (industrial and warehousing sites). Some of the land identified for this economic growth should be recategorised for residential use. This would support the sustainable aim of ensuring more people live closer to areas of employment.</li> </ul>
<b>Green Belt</b>
<ul style="list-style-type: none"> <li>There is general opposition to the loss of green belt and the use of green spaces for development</li> <li>Although the take up of green belt and similar land is less than the 2016 plans it is still too much and needs to be scaled back.</li> <li>This revised draft is a great improvement on the 2016 version in particular in its commitment to build on brownfield sites to avoid using up our precious Green Belt is to be applauded. It is suggested that Greater Manchester should go and have a 'Green Belt Last' policy so that we only develop Green Belt as a last resort.</li> </ul>
<b>Brownfield</b>
<ul style="list-style-type: none"> <li>It is generally felt that there are enough Brownfield sites being sat on by developers to match the need for housing and business throughout Greater Manchester.</li> </ul>
<b>Transport – Highways / Public Transport / Cycling / Walking</b>
<ul style="list-style-type: none"> <li>It is argued that there should be no further development at the airport, as the Greater Manchester carbon budget relies on zero growth in emissions from flights</li> <li>There was a call for Greater Manchester to own services such as trams and trains for the benefit of local people.</li> <li>Current infrastructure base lines have not been set out and neither have projected demands on transport and infrastructure.</li> <li>Additional roads, links to motorways must include more detail. The only thing which has been established is traffic will increase.</li> <li>There needs to be projections for schools, health services and use of recreation facilities not just for businesses</li> <li>There was suggestion that Greater Manchester would benefit from a "circular" Metrolink line so that you do not have to travel in to the city to come back out linking</li> </ul>



<p>the outlying towns and that this would take pressure off the M60 and open up commuting and job opportunities.</p>
<p><b>Environmental – Green Infrastructure, Biodiversity, open space</b></p> <ul style="list-style-type: none"> <li>• The current plan will not deliver carbon reductions in line with the Tyndall Centre's carbon budget for Greater Manchester, which requires emissions to halve in the next 5 years and reduce to zero by 2038.</li> <li>• We must protect our green spaces for our children.</li> <li>• The requirement for new build to be zero carbon should be brought forward from 2028 to 2021.</li> <li>• The presumption against fracking and policy to keep fossil fuels in the ground are welcome and must be retained.</li> </ul>
<p><b>Air Quality</b></p> <ul style="list-style-type: none"> <li>• Air Quality is so important for future generations that it should be given more prominence in the Plan</li> </ul>
<p><b>Other</b></p> <ul style="list-style-type: none"> <li>• It appears to many that there often many good ideas put forward in theory but then these are completely contradicted with the development proposals. This seems to be particularly the case with the green agenda, brownfield first and town centre development</li> <li>• A lot of this needs to be rethought and a wider consultation with people in the area and meetings with local councillors and planners with concrete plans not a policy that is full of pie in the sky.</li> <li>• Although revised the document still has that developer led aspect to it. Whatever is done must be justifiable in terms of connectivity and real demand.</li> <li>• There need to be greater revisions to the framework and a cross-party working group with government and the housing minister to address concerns around housing targets and the potential loss of Green Belt. Communities like Bury will be transformed in a negative way if green spaces are lost in this way and I'd urge politicians to listen to communities to address these concerns and safeguard these areas</li> <li>• It was argued that the Call for Sites exercise in the last consultation could have been used more efficiently. Some of the sites put forward are former industrial sites which were included within the Green Belt by local councils. These should have been explored more thoroughly.</li> <li>• A key theme throughout the draft is the desire to maximise the inclusion and engagement of all the residents of Greater Manchester. However, it was suggested that the plan has missed an opportunity to establish a key mechanism to encourage both engagement and inclusion. The hardest part of any plan is implementation - and a plan as commendably ambitious as this one will require much thought and effort to come to an effective fruition. An approach that is primarily top-down, starting with GMAC and channelling through the Local Plans of the Borough Councils will be insufficient to achieve the objectives set out here within the timescales we need them.</li> <li>• There was some support for the Plan overall and that it was a well-designed programme for the future. Greater Manchester does require an updated, comprehensive and effective spatial framework. A spatial framework is necessary in its own right to determine where new development or redevelopment can take place and, as importantly, to determine where it may not take place. If no framework is in existence, developers have the capacity to challenge by appealing against any planning refusal. It is clear to me that doing this at the GM level is common sense as long as there is buy in at local level across the ten local authority areas.</li> </ul>

- It was highlighted that a truly 21st Century plan, would better recognise the impact of technology, automation and the research of climate scientists highlighting the threat that climate change poses to us all

**Response to Comments**

- As expected by NPPF, the housing need figure used in the GMSF 2020 has been derived using the standard methodology provided in NPPG for calculating local housing need.
- Further evidence has been produced in relation to the employment land demand. The economic strategy outlined in the Prosperous GM chapter complements that within the Local Industrial Strategy.
- The GMSF sets out a clear preference of using previously developed (brownfield) land and vacant buildings to meet development needs. However, given the scale of development required to meet the needs of Greater Manchester a limited amount of development is required on greenfield and Green Belt land as it is critical to the delivery of the overall vision and objectives of the plan. The release of greenfield and Green Belt land has, however been kept to a minimum and has been further reduced since the 2019 version of the GMSF.
- Our Network Chapter and the 2040 Transport Strategy set out the details of how we will achieve this objective. In particular proposals for major improvements to public transport, walking and cycling facilities across Greater Manchester together with options for integrated ticketing, reform of the bus market and whole route upgrades.
- Greener GM identifies policies to protect and enhance green infrastructure, including seeking the net enhancement of biodiversity resources.
- A number of policies within the plan make it clear that development will need to be supported by the necessary infrastructure, including physical and social infrastructure.
- Further evidence has been prepared in relation to Greater Manchester's carbon neutral targets and our pathway to achieve these. The Sustainable and Resilience Chapter sets out specific policies in relation to this
- Greater Manchester is introducing a comprehensive range of measures to support improvements to air quality, one of these is the GMSF strategic planning policy.
- The GMSF 2020 has been informed by the consultation responses to the GMSF 2019. Responses were received from a wide range of stakeholders, including local residents and developers/landowners.
- As with the GMSF2019, consultation for the GMSF 2020 will be undertaken in line with the ten district Statements of Community Involvement. The GMSF 2020 is the "Publication" version of the plan.
- The site selection methodology used to identify the strategic allocations in the GMSF is set out in the Site Selection Background Paper.

### 3.4. Delivering the Plan

There were 878 comments to this chapter which looked at infrastructure implementation and developer contributions.

In particular it was highlighted that it is important that the GMSF is supported by sufficient funding and incorporates delivery mechanisms that are timely and effective. The funding and delivery of infrastructure is important if the growth set out in the GMSF is to be achieved.

A viability assessment is required to ascertain whether the contributions sought by the framework are viable, particularly given the cumulative cost-implications of meeting the plan's overall policy requirements.

More detailed comments in relation to specific elements of the policies are set out below

#### **Infrastructure Implementation:**

- It is important that the GMSF is supported by sufficient funding and incorporates delivery mechanisms that are timely and effective
- The funding and delivery of infrastructure is important if the growth set out in the GMSF is to be achieved.
- Consult residents when planning infrastructure and identifying funding priorities.
- Recognise that canals are part of Greater Manchester's infrastructure (i.e. identify the Canal and River Trust within the policy).
- The policy appears to focus on the main infrastructure providers and overlooks the needs of the voluntary/not-for profit sector and faith groups.
- Social infrastructure is equally as important to the growth of the Manchester area.
- Network Rail should be added to the list of infrastructure providers alongside Transport for the North.
- We support the requirement for local authorities to collaborate with the NHS; this will ensure that adequate provision is made for healthcare.
- The plan should be explicit in requiring that Greater Manchester's local planning authorities co-operate with neighbouring councils in collaborating with infrastructure providers, particularly in the delivery of cross-boundary health estate plans and when determining planning applications relating to healthcare facilities.
- Pleased to see the policy requiring close collaboration between GMCA, infrastructure providers and landowners.
- The GMSF is not accompanied by any evidence that sets out Greater Manchester's infrastructure needs and how these will be funded (particularly with respect to transport infrastructure).
- The GMSF must outline the circumstances under which compulsory purchase would be used.
- An infrastructure phasing and delivery strategy phasing should not be needed for small, self-contained sites.
- The GMSF places a disproportionate and unnecessary burden on the development industry.
- Collaboration is required to ensure that utilities infrastructure is planned and delivered in a coordinated way.
- References to the ambition of improving healthcare infrastructure could be strengthened.
- Reference the Greater Manchester Estates Strategy.
- GMCA needs to ensure that effective modes of communication are put in place and the key infrastructure and service providers adopt a collaborative approach to ensure development is not unnecessarily delayed due to infrastructure capacity and constraints.

- The GMCA needs to be mindful of the current restriction on the pooling of planning obligations. Although it has been suggested that the restriction could be lifted or a Strategic Infrastructure Tariff could be introduced, neither of these are currently in effect.
- Demonstrate that the strategic allocations are still viable in light of the infrastructure requirements set out for each.
- Assess the adequacy of the infrastructure proposed on a site-by-site basis.
- Green Belt areas have very little existing infrastructure and therefore any growth should be carefully planned to ensure that infrastructure provision does not unduly delay housing delivery.
- The GMSF should define what is meant by a 'reasonable gas and water supply, considering the need to conserve natural resources', and how this will be achieved.

**Developer Contributions:**

- A viability assessment is required to ascertain whether the contributions sought by the framework are viable, particularly given the cumulative cost-implications of meeting the plan's overall policy requirements. There should be consultation on this to allow for the development industry and other interested parties to comment on key inputs such as land values, build costs and sales values.
- Developers must not be allowed to renege on their contributions once agreed.
- Obtaining Community Infrastructure Levy and Section 106 contributions from developers prior to commencement is already problematic.
- Developers should share a reasonable proportion of the profits gained through development.
- Community needs should be considered when identifying an acceptable level of developer contribution.
- There is a need to ensure that education contributions are sufficient to deliver the additional school places required to meet the increase in demand generated by new developments. Councils within the Greater Manchester area should set out education infrastructure requirements for the plan period within an Infrastructure Funding Statement. Where additional need for school places will be generated by housing growth, the statement should identify the anticipated CIL and Section 106 funding towards this infrastructure.
- The GMSF should recognise that voluntary and not-for profit organisations will need additional facilities within the plan period and that these may rely on developer contributions.
- It is imperative that Section 106/CIL contributions are sought for smaller residential developments; particularly to support the NHS services coping with the cumulative effect of smaller development proposals.
- It is unrealistic to expect developments to wholly fund new strategic infrastructure without public sector support (particularly if that new infrastructure will remedy existing capacity issues).
- If the contributions sought are not proportionate, development viability will be undermined, and Greater Manchester's growth needs will not be met.
- The policy should propose a higher levy for any development on Green Belt in order to incentivise brownfield development.
- The introduction of a regional Greater Manchester Strategic Infrastructure Tariff over and above local Community Infrastructure Levies would disincentivise development.

**Response to comments:**

- Agree that funding and delivery of infrastructure is important if the growth set out in the GMSF is to be achieved. A Strategic Infrastructure Board has been established. Public funding has been provided to the CA and a case is being made to Government through the CSR for devolved funding to deliver the Greater Manchester Infrastructure Programme.
- Residents are consulted by utilities, infrastructure providers, when planning for infrastructure and there is a requirement for Local Planning Authorities to produce Infrastructure Funding by December 2020.
- Canals are part of Greater Manchester's blue/green infrastructure and are recognised separately in a specific policy on waterways.
- The policy is focussed on strategic infrastructure and therefore the utilities that are publically owned or are private regulated monopolies.
- Agree that social infrastructure is equally as important to the growth of the Manchester area. This is addressed in the Greater Manchester for Everyone Chapter and within individual site allocation policies.
- Network Rail have been added to the list of infrastructure providers alongside Transport for the North.
- Collaboration is facilitated in Greater Manchester by the Health and Social Care Partnership and devolution.
- This requirement to co-operate with neighbouring Local Planning Authorities and others is already set out in planning legislation, policy and guidance and doesn't need to be repeated.
- The evidence for Greater Manchester's infrastructure needs - particularly with respect to transport infrastructure is set out in the Transport 2020 Strategy, Transport Delivery Plan and Local Implementation Plan and Local Infrastructure Funding Statements.
- Circumstances where CPOs may be necessary are reflected in the allocation policies and / or Local Plans and associated Strategic Regeneration Frameworks/ Mayoral Development Corporation Business Plans.
- It's noted that an infrastructure phasing and delivery strategy phasing should not be needed for small, self-contained sites.
- Disagree that the GMSF places a disproportionate and unnecessary burden on the development industry. It's right and fair that the development industry make a reasonable contribution towards infrastructure. Issues concerning viability and contributions are set out in the viability assessment.
- Agree that collaboration is required to ensure that utilities infrastructure is planned and delivered in a coordinated way. This is the raison d'être for the Strategic Infrastructure Board and a series of bilateral agreements are being developed to facilitate collaboration between the CA and utility companies.
- References to the ambition of improving healthcare infrastructure have been strengthened.
- Agree that Green Belt areas have very little existing infrastructure and therefore any growth should be carefully planned to ensure that infrastructure provision does not unduly delay housing delivery.
- Issues concerning viability and contributions are set out in the viability assessment.

#### 4. Appendix A: Statement of Community Involvement Compliance Summary

District	Date of Adoption <sup>1</sup>	Methods employed during consultation on the Draft Plan for Jobs, Homes and the Environment (GMSF Revised Draft) January to March 2019
<a href="#">Bolton MBC</a>	2011	<ul style="list-style-type: none"> <li>• Council's website</li> <li>• Emails to Development Plan Consultation database</li> <li>• Press release and articles in local newspaper</li> <li>• Contacting all on development plan consultation database</li> <li>• Drop-in Events (2) advertised via council website; press release; news articles in the Bolton News; Twitter and facebook; GMCA website; letters to addresses on or close to proposed development sites</li> <li>• Hard copies in Council offices and libraries</li> <li>• Regular tweets and Facebook updates for the duration of the consultation</li> </ul>
<a href="#">Bury MBC</a>	2015	<ul style="list-style-type: none"> <li>• Letters to all households</li> <li>• Emails to Local Plan database</li> <li>• Hard copies on deposit in public buildings</li> <li>• Bury Council Website</li> <li>• Adverts in local newspapers</li> <li>• Posters in deposit points and on notice boards across the district</li> <li>• TV Displays in Town Hall Reception and other public buildings</li> <li>• Regular tweets from Council</li> <li>• Public drop-in events (6)</li> </ul>
<a href="#">Manchester CC</a>	2018	<ul style="list-style-type: none"> <li>• Council website</li> <li>• Hard copies in Central Library</li> <li>• Contacted all on Planning Policy Database (email and letters)</li> <li>• Social media alerts</li> <li>• Public drop-in events (2) advertised through website, social media and posters displayed in Town Hall and Wythenshawe Forum</li> </ul>
<a href="#">Oldham MBC</a>	2016	<ul style="list-style-type: none"> <li>• Email and letters to Local Plan database</li> <li>• Hard copies in public libraries and council's principal offices</li> <li>• Council's website</li> <li>• Public notice published in local newspaper</li> <li>• Press releases</li> </ul>

District	Date of Adoption <sup>1</sup>	Methods employed during consultation on the Draft Plan for Jobs, Homes and the Environment (GMSF Revised Draft) January to March 2019
		<ul style="list-style-type: none"> <li>• Social media – regular Tweets and Facebook posts</li> <li>• Public drop-in events (11) advertised via Council and GMSF webpages, social media, press releases and posters</li> <li>• Council employee drop-in event</li> </ul>
<a href="#">Rochdale MBC</a>	2015	<ul style="list-style-type: none"> <li>• Emails and letters to Local Plan database and Councillors</li> <li>• Hard copies in principle libraries and the Council’s Customer Service Centre</li> <li>• Council’s website</li> <li>• Press Release</li> <li>• Social media, regular Tweets and Facebook posts</li> <li>• Public drop-in events (5) advertised through webpage, social media and press release</li> </ul>
<a href="#">Salford CC</a>	2010	<ul style="list-style-type: none"> <li>• Letters to general and specific consultees on planning database</li> <li>• Email to Councillors and Neighbourhood Managers who circulated to community networks</li> <li>• Social media</li> <li>• Council’s webpage</li> <li>• Hard copies at deposit locations across the city including libraries and Gateway locations</li> <li>• Drop-in consultation event for stakeholders and residents advertised in the letters, through social media and email to Councillors</li> <li>• Presentation and Q&amp;A at community committees (5)</li> <li>• Local Newspapers and radio including article in Jewish Advertiser and advert in Talking News for the Blind</li> </ul> <p>NB Consultation on draft GMSF run in parallel with consultation on revised draft Local Plan.</p>
<a href="#">Stockport MBC</a>	2015	<ul style="list-style-type: none"> <li>• Emails/letters to Local Plan database and to businesses registered on the Economic Development circulation list</li> <li>• Hard copies in libraries and Council’s main office</li> <li>• Council’s website</li> <li>• Advert in local newspaper</li> <li>• Posters and flyers in libraries and at drop-in events</li> <li>• Social media, regular Tweets and Facebook posts</li> <li>• Drop-in events (11) and public meeting advertised by email/letter, website, social media, advert in local paper, posters</li> </ul>
<a href="#">Tameside MBC</a>	2016	<ul style="list-style-type: none"> <li>• Letters/emails to all on Local Plan database and to Councillors, MPs and Chief Officers</li> </ul>

District	Date of Adoption <sup>1</sup>	Methods employed during consultation on the Draft Plan for Jobs, Homes and the Environment (GMSF Revised Draft) January to March 2019
		<ul style="list-style-type: none"> <li>• Hard copies in libraries, Council’s customer service centre/principal office</li> <li>• Site notices around strategic sites/key locations</li> <li>• Council’s website</li> <li>• Drop-in events (9)</li> <li>• Posters in libraries</li> <li>• Regular social media posts including Facebook and Twitter</li> <li>• Presentation to Tameside Youth Council</li> <li>• Adverts and articles in local newspapers</li> <li>• Email brief to Clinical Commissioning Group Staff</li> <li>• Articles in Council’s Citizen magazine (free to residents and businesses) and the staff newsletter for employees.</li> <li>• Included in Leaders blog</li> </ul>
<a href="#">Trafford MBC</a>	2015	<ul style="list-style-type: none"> <li>• Emails to Local Plan database and Partnership and Communities mailing lists</li> <li>• Hard copies in libraries, Trafford Town Hall and Sale Waterside Offices</li> <li>• Council’s website</li> <li>• Press releases and advert in local newspaper</li> <li>• Posters in libraries and leisure centres</li> <li>• Social media – regular tweets posted</li> <li>• Drop-in events (7) advertised via email, website, newspaper advert, posters and Twitter</li> </ul>
<a href="#">Wigan MBC</a>	2015	<ul style="list-style-type: none"> <li>• Council website</li> <li>• Article in local newspaper</li> <li>• Social media – regular tweets posted</li> <li>• Member briefings</li> <li>• Drop-in events (5)</li> <li>• Hard copies in libraries</li> </ul>

Date of adoption of the SCI, applicable at time of consultation



## 5. Appendix B: New Sites Submitted in 2019

A number of additional sites were put forward as part of the Greater Manchester's Plan for Homes, Jobs and the Environment (Revised Draft GMSF) 2019 consultation process. These have been logged as follows and categorized into:

1. Urban area: Already part of land supply.
2. Urban area: New site to be considered in land supply update
3. Non-urban area: Site put forward as part of 2016 call for sites.
4. Non-urban area: New site to be considered as part of updated site assessment process.

Consultation submission ID	Site Name	Category: 1,2,3 or 4
<b>District: Bolton</b>		
720179887	Land off Moss Lane	3
783990820	Birtenshaw, near Bromley Cross station	4
340690011 93990048 298350555	Bowlands Hey, Westhoughton	3
358056210	Land west of Fernside, Stoneclough	4
143184754	Land off Blackburn Road, Egerton	3
176950068	Chew Moor Lane, Westhoughton	3
461528974	Harwood Lee	3
763000777	Land at Stitch-mi-Lane	4
904952339	Land at Collingwood Way	1
12391018	Land to the South of Lock Lane, Hunger Hill	3
241457838	Land at Regent Park Golf Course	3
1072843252	South Bolton	4
1072843252	SE Junction 4 M61	3
1072843252	SW Junction 4 M61	3

Appendix B New Sites Submitted in 2019

1072843252	Slack Fold Lane	3
1072843252	Hulton Park	3
1072843252	Land South of Chequerbent	3
1072843252	Snydale Gate Farm	4
933027798	Hunger Hill	3
1072843252	Horwich Golf Club	3
302036901	Hall Lane, Little Lever	3
200559455	Land South of Cox Green Road, Egerton	4
795915196	Land at A6, Blackrod Bypass	3
929958794	Land at Leigh Tenement Farm, Blackrod	3
929958794	Land at Manchester Road, Blackrod	3
929958794	Land at Rigby Hill, Blackrod	4
338812823	Land off Dixon Street, Wingates, Westhoughton	3
338812823	Land at Slack Lane, Westhoughton	3
225626699	Land to the North of Meadow Barn, Bradshaw Road	3
212942911	Former Bolton Open Golf Course, Harwood	3
76657767 330802954	Land at Kiln Field, Bromley Cross	3
509410010	Land at Last Drop, Bromley Cross	3
725445596	Land at Arthur Lane, Harwood	3
267186367	Land at Brookside Road, Bolton	4
541917762	Land at Thicketford Road, Bolton	4
1047728244	Land to the South of Chorley Old Road, Bolton	4
475869633	Horrobin Fold Farm, Chorley Old Road	4
90523718	Ditcher's Farm	3
745403282	Plodder Lane, Bolton	3

Appendix B New Sites Submitted in 2019

679903442	Wigan Road, Hindley	3
675929220 399153318	Beaumont Estate – Land parcels at Old Kiln Lane, Stapleton Avenue, Ladybridge Lane, Armadale Road, Junction Road West, Rumworth Lodge, Winslow Road and Lock Lane	4
675929220	Land at St Johns Road, Chew Moor, Lostock	3
591467803	Lever Park Avenue, Bolton	3
646260478	West of Wingates	4
<b>District: Bury</b>		
438248965	Land north of Bevis Green Works, Walmersley	3
839535650	Land west of Holcombe Road/North of Brookhouse Mill Lane, Greenmount	3, 4
958199075	Land at Holcombe Road, Greenmount	3
953011132	Land at Ashwood Avenue, Ramsbottom	3
1037235242	Land off Cams Lane, Radcliffe	3
595122530	Stormer Hill, Tottington	3
784681697 839535650	Land at Ringley Road West, Outwood	4
690802704	Park Lane Farm, Whitefield	3
5661395	Land off Starling Road, Bury	3
288178317	Land at Long Lane, Walmersley, Bury	3
328942939 1059034401	Land off Hollins Lane, Unsworth	3
1072843252	Land south of Greenmount, Bury	3
1072843252	Nuttall Lane, Ramsbottom	3
1072843252	Fletcher Bank Quarry, Ramsbottom	3
1072843252	Ripon Hall Avenue, Ramsbottom	3
265108626 791371316	Nurseries, Walshaw	3/4
957737038	Off Simister Lane, Simister	4

Appendix B New Sites Submitted in 2019

608924892	Land at Gin Hall, Bury	3
72375538	Old Hall Lane, Whitefield	4
267186367	Land on the south side of Leigh Lane, Bury	4
669472989	Brandlesholme Farm, Brandlesholme	3
<b>District: Manchester</b>		
147938785	Northenden Riverside Caravan Park	3
208373790	Land South of M60 and North of Northenden Junction (Didsbury Golf Course)	3
630586514	Land at Boothroyden Road/Alworth Road, Blackley	3
731106399	Atlas Business Park	4
<b>Oldham</b>		
368621923	Wall Hill Road, Dobcross,	4
965665344	Land at Lower Stones Farm, Oldham Road, Delph, OL3 5EA	3
983598562	Ashton Road Corridor	3
754410488	Bardsley Vale	3
<b>Rochdale</b>		
176950068	Langley Lane, Middleton	3
240039790	Land at Lane End, Heywood	3/4
537603982	Land at Gerrard Hey Farm	4
286689559	Land west of Whitelees Road, Littleborough	4
572736270	Land off Bury Old Road, Heywood	4
778130281	Land to the east of Phoenix Close, Heywood	4
326354769	All In One Garden Centre, Manchester Road, Castleton	4.
<b>Salford</b>		
1009292230	Clifton Casey Group	3

Appendix B New Sites Submitted in 2019

1009292230	Land off Manchester Road Clifton	3
6647002	Land off MacDonald Road	3
461528974	Land off Springfield Lane and School Lane, Irlam	3
785014518	Monks Hall, Monks Hall Grove, Eccles	4
785014518	Boysnope Golf Course, Irlam	3
1072843252	Port Salford Extension – additional land to the east of Irlam	4
860247082	AJ Bell Stadium, Irlam	4
489301584	Kingsland Wines, Cadishead	1
556654463 327855704	Port Salford	1
1072843252	Broadoak	3
1072843252	Crossfield Drive	3
1072843252	Beesley Green	3
1072843252	Linnyslaw	3
1072843252	Wardley	3
1072843252	Walkden Road	3
1072843252	Leigh Road	3
1072843252	Lumber Lane	1
558912930	Land off Moss Lane proposed as a new area of Green Belt in the GMSF	4
591213675	Land west of Irlam Station	4
<b>District: Stockport</b>		
518035788	Land adjacent to the M60 and Ashton road Bredbury Sk6 2qt	4
11214377	Blackstone Fields, next to the Offerton Fire station	1
348592806	Land at Ashton Road junction	3
348592806	Bulkey and bland lower Bredbury	4

Appendix B New Sites Submitted in 2019

376404087	Community centre, George lane (Area office?)	4
685036352	Extension to allocation 36, Unity Mill	4
893625180	Cheadle Royal Hospital	1
417977307	Land off Jackson's lane , Hazel Grove	3
558838784	'small field off Windlehurst road and Torkington lane'	4/3
501618106	Site immediately north of High Lane allocation	4
75030697	Grange Farm and land off 211 Windlehurst Road	3
402896278	Land at Mill Farm (Site A)	3
402896278	Land at Mill Farm (Site D)	3
402896278	Land at Mill Farm (Site B)	3
402896278	land off Mill Lane	3
77932590	Land by cricket pitch	4
77932590	Canal club and garage off A6 , opposite Windlehurst road	2
77932590	the old tip down Middlewood Road	4
77932590	the council land on both sides of the spur road off Middlewood Road to the Club	4
77932590	Other Council Land around and about including LP43/0955	4
395289998	South side of the new Manchester Airport link road on the High Lane/ Middlewood /Hazel Grove border	4
155208729	other areas nearer the Old Woodford Flight shed	4
469675678	Land of Threphurst Lane	4
46606340	Compstall Mill , Compstall	1

Appendix B New Sites Submitted in 2019

136417437	Stockport Town Centre	1
474067779	Suggested modification to site 40 (Griffin Farm)	3
175076936	Suggested modification to site 40 (Griffin Farm)	3
696119455	Suggested modification to site 40 (Griffin Farm) North Cheshire Golf club	3
113091619	Suggested modification to site 40 (Griffin Farm)	3
36873042	Amendment to Woodford allocation	3
178770274	Land in Cheshire East rep states it is in Cheshire East SHLAA	4
477996522	South of Jacksons Lane	3
771932769	Moor Lane and Jenny Lane	3
669472989	Land off Sandown Road and South of Torkington in Hazel Grove	3
208373790	Mill Farm Hazel Grove	3
828802407	Norbury Hall	3
461528974	Pear Tree Close	3
771932769	Land off Jenny lane across from Moor Lane /Jenny Lane	3
828802407	Weavers Brook , Norbury Hall	3
674918216	Walnut tree, land off Chester road, bound by A6MARR)	3
674918216	Land north west for Chester Road (Site A)	3
245651802	Land north of Compstall Road, Romiley	3
961660184	Land at Werneth Road	4

Appendix B New Sites Submitted in 2019

234897710	Land north of Moor lane	3
384607343	Land at Hall moss lane	3
863597271	Land at Hill top farm	4
909885172	Land South of Brickbridge Road, Marple	3
962961405	Land south of Stanley road	3
<b>Tameside</b>		
1026559166	Land at Holme Valley, Woolley Bridge, Hollingworth.	4
771932769	Land at Lees Road, Ashton-under-Lyne..	3
656172730	Grosvenor Mill Business Centre, Grosvenor Street, Ashton-under-Lyne.	2
465559274	Land north and south of Lumb Lane, Ashton-under-Lyne.	3
625408739	Limehurst Farm, Ashton-under-Lyne..	3
408115238	Cross Lane, Littlemoss.	3
840886436	Land at Marl Villa, Mottram Road, Hyde..	3
210282246	Land at Matley Lane, Hyde.	3
353730243	Wakefield Road, Stalybridge..	3
656007407	Hyde Hall Farm, Denton..	3
<b>District: Trafford</b>		
723869116	Land at Hasty Lane,Hale	3
240381695	Green Lane, Timperley	4



Appendix B New Sites Submitted in 2019

527404237	Land at Bow Green Farm	3
1042171052	Rossmill Lane	4
856604260	Warwick Road South	2
290031034	Land at Green Lane Farm	4
568389002	Land at Dane Road, Sale	4
376888743	Land at Bailey Walk	3
316051101	Wilkinsons Fields	3
161936069	New Manor	3
89381009	Land South of Clay Lane Timperley Wedge	3
789412008	Hale Road south of Marriott Hotel	3
144881078	Ash Tree Farm, Ashton-on-Mersey	3
1026594935	Land off Shay Lane/Brooks Drive	3
1072843252	Peaks Nook, Carrington	2
<b>District: Wigan</b>		
279273163	Land at Drummers Lane	4
994826545	Martland Mill Farm, Martland Mill Lane	4
1072843252	Mosley Common Extension	3 and 4
1072843252	West of Gibfield	3 and 4
1072843252	Astley-Boothstown	3 and 4

Appendix B New Sites Submitted in 2019

1072843252	Land West of Astley	3 and 4
929958794	Land at Gilded Hollins, Pennington	3
570582649	Junction 26, Wigan	4
1007865675	Land south of M6 Junction 25 slip road, Wigan	3
234897710	Lee Lane Farm, Abram, Wigan (Land South of Abram)	3
165729821	Land at Mill Farm, Downall Green Road, Ashton-In-Makerfield	3
539611702	Land at North Lane and South Lane Astley	3
349700425	Land East of Shakerley Lane, Atherton	3
709009750	North of Haydock Park Racecourse	1
581426103	Crompton House Farm Off Hope Lane Leigh Lancashire WN7 3SF	4
963791157	Astley Golf Driving Range, Manchester Road, Astley, M29 7EJ	4
528036301	Leyland Green Farm, Garswood	3
568742051	Land at Wigan Road, Standish	3
157730759	Sovereign Road, Leigh	1
765214858	Land at Rowton Rise, Standish	1
444067137	Sandy Lane, Lowton	3
1020845322	Wigan Road, Golborne	3
929958794	Land at Hall Lane, Land at Withington Lane (East) and Land at Gidlow Hall Farm, Aspull. )	3
892001602	Land to the rear of Marklands Farm, Astley	4

Appendix B New Sites Submitted in 2019

427436341	Land to the North West of Parsonage Retail Park, Leigh	2
845924579	Astley Point Business Park, Astley	1 and 4
253619303	Land to the east of North Road, Atherton	3
298849648	Land at Orrell Road, Wigan	3
565744886	Land fronting Old Pepper Lane, Standish	3
669472989	Land fronting Old Pepper Lane, Standish	3
669472989	Back Lane, Appley Bridge	3
732189975	East of Atherton and South of Atherton	1
238974728	Upholland Road, Longshaw, Orrell	3
523234100	Land at Standish Lower Ground, Wigan	3
176950068	Land off Rectory Lane (Phase 3), Standish	1 and/or 2
176950068	Land of Pepper Lane, Standish	1 and/or 2
504957375	Land lying to the east of Princess Road	4
436136562	Northleigh Park	1