

18 March 2019

*working locally and
nationally for a beautiful
and living countryside*

Mr Andy Burnham
Mayor of Greater Manchester
Greater Manchester Combined Authority
Churchgate House
56 Oxford Street
Manchester
M1 6EU

Dear Andy Burnham,

I am writing on behalf of the Campaign to Protect Rural England North West Regional Group, CPRE Lancashire, CPRE Cheshire and Friends of the Peak District (herein after referred to as CPRE) in response to the Greater Manchester Spatial Framework Revised Draft, January 2019.

Overall, we are pleased with the positive amendments to this version of the framework, which will guide strategic planning decisions over the next 20 years. However, we think there can be much more greenfield land saved from needless development. Below we set out our genuine planning reasons as to why this is the case.

Like GMCA, CPRE wishes to see a more attractive and socially inclusive city region with safe, decent and affordable homes and jobs for everyone. We are supportive of the aim to reinvigorate existing town centres, with integrated public transport hubs. We applaud the wish that everyone has access to quality green space and clean air to breathe. Importantly, the people of Greater Manchester will continue to have access to green spaces on their doorstep to enjoy for recreation and leisure with all the health and well-being benefits derived from a walk or bike ride in the countryside.

CPRE observes that the Revised Draft really does “bring the countryside into the city-region”. We recognise that you have listened to the vast majority of people who objected to Green Belt loss, and that many Green Belt allocations have now been removed, and there are proposals to create new Green Belt, with an improved focus on brownfield land reuse. This will ensure that the countryside of Greater Manchester is better protected and enhanced for future generations. The benefits of the rural landscape are wide, and include related jobs in farming and food production, natural capital services, including a network of habitat for our wildlife and flood-resilience to assist climate change adaptation.

CPRE has considered the Revised Draft policies and allocations and has prepared answers to the 140 questions posed with relevant commentary. We still have a number of

significant concerns, such as the economic growth rate assumed being unreasonably high, particularly given the ongoing economic uncertainties recognised in the Revised Draft, but perhaps not extensively enough, as the result of Brexit and wider global economic shocks. This in our view has led to inflated jobs and housing figures.

The preference for brownfield land being developed in advance of greenfield is of real merit and we applaud GMCA for this approach. That said, we remain concerned that there are too many brownfield sites where the Revised Draft GMSF offers little or no prospect of being brought forward for development. Despite the Government's National Planning Policy Framework, 2018, introducing Section 11 to make more effective use of land, including brownfield, combined with recently introduced Brownfield Registers, we see sites defined as "unsuitable" as undervalued. We think GMCA could use its devolved powers to more effectively unlock the potential of these wasted sites and in doing so more greenfield, including Green Belt, land could be spared from needless development.

The Review of Build Out led by Sir Oliver Letwin MP and commissioned by the Government offers GMCA with constituent local authorities potential leverage to gain further powers to increase the rate of housebuilding within Greater Manchester. The Review recommends further powers for local authorities in areas of high housing demand to cap development land values on large development sites and take a more direct role in developing these sites so that there is a greater mix of housing types delivered than has been seen in recent years. At least two areas of Greater Manchester can already be considered 'high demand areas' in terms of the definition Letwin uses. In any case, the new powers Letwin recommends would be of direct relevance to achieving GMCA objectives for affordable housing delivery in particular and we would therefore recommend that you press central Government to apply the Letwin recommendations within and across Greater Manchester. At the time of writing the Government is yet to formally respond to the Letwin Review, but it is potentially significant.

We present our ideas for targeted action by suitable partnership approaches including community-led regeneration in the future. We hope that in practice, more "grot spots" could be cleaned, developed and/or greened to make a more meaningful contribution in the future. We think everything that is possible must be done to optimise the societal value of all brownfield land so it may be fruitfully reused.

We set out our comments in more detail below.

Yours sincerely

Jackie Copley MRTPI MA BA(Hons) PgCert

Planning Manager

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President
Emma Bridgewater
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Nick Thompson

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Appendix One: Answers to 140 Questions

Question 1

What type of respondent are you?

I am a chartered town and country planner, with over 25 years' experience, employed by an environmental charity and I am submitting this on its behalf

Question 2

Contact Details - Please give us the contact details of the person completing this consultation response.

Ms Jackie Copley M21 8XE jackie.copley@cprelancashire.org.uk

Question 3

Are you over the age of 13?

Yes, I confirm that I am over the age of 13.

Question 4

If you're submitting a response on behalf of an organisation or group, please also give us their details.

CPRE Lancashire, PO Box 1386, PRESTON, PR2 0WU info@cprelancashire.org.uk

Question 5

We would like to be able to publish responses after this consultation closes. Are you happy for us to do this?

Yes, please publish my response in full.

Question 6

Do you agree that we need a plan for jobs and homes in Greater Manchester?

Yes, in line with National Planning Policy Framework, 2018 (NPPF 2018) Sections 5 and 6, CPRE very much agrees, but suggests a more balanced approach is still needed.

Question 7

Do you agree that to plan for jobs and homes, we need to make the most effective use of our land?

Yes, in line with the NPPF 2018 Section 11, we strongly agree.

Question 8

Do you agree that in planning for jobs and homes, we also need to protect green spaces that are valued by our communities?

Yes, in line with NPPF 2018 Section 13 and 15, we strongly agree.

Question 9

Do you agree that to protect green spaces, we need to consider how all land in Greater Manchester is used?

Strongly agree.

Question 10

Is the approach that we have outlined in the plan reasonable?

Agree

Overall we are positive about the approach being applied, as the Revised Draft is a great improvement on the previous Draft GMSF, of December 2016. However CPRE considers there is still some improvement necessary to ensure more realistic ambition is applied in the proposed scale of jobs and housing growth, and to promote more ambition for making more effective use of all the previously developed land. The narrow definition currently applied by Government for only “suitable brownfield sites” could be widened by GMCA. Reusing all brownfield would free blighted neighbourhoods and protect more greenfield land, including Green Belt from being needlessly bulldozed for development.

In addition, we would also question the statement in paragraph 1.16 that the NPPF does not support an explicit ‘brownfield first’ approach. Although there have been some cases where local plan inspectors have prevented local authorities from controlling the release of development sites so that the brownfield sites are used first, a phasing approach was allowed in Leeds in 2014 (under a version of the NPPF that was less supportive of brownfield development than the 2018 version), where the examination inspector waved through Policy H1 with minimal changes as consistent with the NPPF. This policy is also remaining unaltered during the current selective review of the wider Leeds Core Strategy, currently under examination. The text of the current, adopted policy H1 is included with this response. We therefore recommend that Strategic Objective 2 should add to the commitments to ‘prioritise brownfield land’ by adding 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.’

In addition the Letwin Review final report in October 2018 recommended a range of reforms that, if implemented and/or included in future devolved powers, could assist GMCA in bringing forward brownfield sites more quickly. We say more about these under Question 43 below.

Question 11

Do you have any comments about the context of the plan?

The context of the plan is not appropriately balanced because it focuses too much on the perceived need to expand travel opportunities while failing to recognise exponential growth in home-working (over 14% of average employed people, according to Office of

National Statistics in 2016) and on the importance of reducing our need to travel in the future.

Also, CPRE believes the expansion of Manchester Airport and proposed road building is at odds with Greater Manchester's ambition to be a carbon-neutral city-region by 2038. We agree that climate change needs an urgent response so understand the pressing need to keep fossil fuels in the ground, but are concerned about the ability to deliver much needed net gain in biodiversity assets over the plan period and the production of a Clean Air Plan in the context of building more roads and growing substantially the number of flights annually at Manchester Airport. The Greenhouse Gas (GHG) emissions and air pollution impacts from such additional air travel to and from Manchester Airport must be properly assessed, and mitigated.

Greater Manchester must get more freight and passengers on to rail, as conveying cargo and people on the motorway network is unsustainable. It contributes to GHG emissions and air pollution. CPRE campaigns for a modal shift from road and air to heavy and light rail and to active travel for short journeys, but is concerned that HS2 would cause a net environmental loss, particularly with key stations being proposed in Green Belt locations, and the landscape impact, noise and GHG emissions associated when running trains at very high speed.

Improved rail-connectivity for traditional trains between northern towns and cities to progress the Northern Powerhouse concept into reality is supported, although we reserve judgement on the proposed new link between Manchester and Bradford subject to understanding better the route consequences. Rail improvements should certainly be prioritised over road investment and we are in favour of tram trains. We do not support the new concept of a new Trans Pennine road tunnel.

We are aware that there are areas suffering from multiple deprivation and hope that the GMSF will alleviate such disparities of socio-economic performance, such as health and the well-being of our natural environment, and by raising the quality of life for everyone, including for those who live, work and visit the rural parts of the city-region.

Question 12

Do you agree with the Strategic Objectives?

Mostly agree

What is the reason for your answer?

Objective 1 - CPRE welcomes the GMCA definition that prioritises genuinely needed homes. CPRE agrees that the definition of affordable housing should not include market starter homes as these are not affordable after they are sold for the first time. In areas of acute affordable housing shortage, particularly rural areas CPRE believes 'Right to Buy' should be restricted as no matter how fast registered providers build new homes, affordable housing is sold off and the deficiency in supply causes disadvantage to poorest households. All new homes should be carbon neutral.

Objective 2 - We recommend that Strategic Objective 2 should (i) add to the commitments to 'prioritise brownfield land' by adding 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 green space.

Objective 3 -Should the food and drink sector be a high value cluster?

Objective 4 - There is concern over focusing development at Manchester Airport as this will cause the loss of greenfields in Green Belt. Manchester City Centre is the centre of the city-region and not the airport. Improvement of opportunities for sustainable freight must include more rail and water based transport. There needs to be advancement in the harnessing of cleaner technology in aircraft and other vehicles, such as electric cars, if the city-region is to expand the airport activity and achieve its carbon neutrality goal by 2038.

Objective 5 - Everyone should have access to quality green space.

Objective 6 - Opportunities for a modal shift to rail both for passenger and freight must be secured.

Objective 7 - We applaud the goal of promoting carbon neutral new development by 2028, clean air and reducing car dependency.

Objective 8 - We recommend that there should be reference to the access to specific countryside areas within the City-Region.

Objective 9 - Please add green infrastructure to the third bullet.

Question 13

Do you agree with the Spatial Strategy?

Mostly agree

What is the reason for your answer?

Too much development quantum is identified.

However, the Spatial Strategy does seek efficient use of land resources, and this is of course welcomed by CPRE. However, the Figure 4.1 is too economic focused and CPRE would like to see some recognition of the quality of the natural environment and identification of key green areas linking the urban core with the rural hinterland.

Over recent years, CPRE has focused on brownfield issues in some detail, resulting in a large body of research based evidence (search for brownfield at www.cpre.org.uk). We show nationally more than one million homes could be accommodated on brownfield land.

We particularly support paragraph 4.10 "Abnormal costs such as those associated with addressing land contamination can have a negative impact on the viability of developing brownfield sites, and so securing funding to support remediation will be a priority." This aligns well with the Government's revised National Planning Policy Framework, July 2018 (NPPF 2018) new Section 11 on making more effective use of land, Paragraph 117 says:

Strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously-developed or 'brownfield' land. See also the recommendation we make on phasing of development under Question 10 above.

Previously, successive Governments heralded flagship regeneration initiatives to unlock the development potential of constrained brownfield land, such as at Salford Quays, which now boast Media City, The Lowry and the Imperial War Museum. CPRE urges Government to do more to support GMCA in capitalising on more brownfield reuse, through a higher level of funding commitment, to harness the public benefits and in doing so really add value to the Greater Manchester economy and wider Northern Powerhouse, whilst at the same time saving countryside from needless development. The area should be a net tax contributor and not a net tax taker.

Therefore the Revised Draft Greater Manchester Spatial Framework has a welcome brownfield preference. The GMCA, with the ten LPAs, needs to ensure it utilises the full range of powers available. The approach should include identifying opportunities to facilitate land assembly, supported where necessary by compulsory purchase powers, where this can help to bring more land forward for meeting development needs and/or secure better development outcomes.

Devolution will ultimately convey new powers to the Mayor and GMCA to set up a Mayoral Development Corporation and utilise Compulsory Purchase Orders (CPOs) to unlock constrained sites. Partnership approaches should be sought to help identify new sources of funding, to progress brownfield strategies and site specific action plans. We hope that GMCA will show real ambition and leadership, and set appropriate targets which can be effectively monitored so performance can be assessed over time.

The contribution of smaller sites is recognised and at least 10% of an area's housing requirement should be accommodated on sites no larger than one hectare. The development of windfall sites (sites not specifically identified in the development plan) is also encouraged.

CPRE's Brownfield Land Register Toolkit enables communities to identify sites to their local planning authority's planners. During the consultation period for the Revised Draft GMSF CPRE has met with a number of local groups to identify brownfield sites that are 'missing' from the brownfield registers. CPRE wants more effort to go into identifying all suitable brownfield sites to minimise the need for Green Belt release. We will continue to work with communities to provide completed toolkits to their respective local planning authority.

Question 14

Do you agree with the proposed policy on the Core Growth Area?

Agree

What is the reason for your answer?

The Core Growth Area is the most accessible place in the City Region, with existing transport connections and other supporting infrastructure. Focusing growth at the Core Growth Area helps maximise the accessibility of jobs to residents in existing built up urban areas and it is hoped the access will be supported by sustainable and public transport modes.

Question 15

Do you agree with the proposed policy on the City Centre?

Agree

What is the reason for your answer?

The City Centre is the right location for land uses at higher density due to the highly accessible nature. We agree housing should complement rather than displace, however there may be a case to displace least amenable land use types such as scrap yards, garages and other dirty uses.

Question 16

Do you agree with the proposed policy on The Quays?

Agree

What is the reason for your answer?

The Quays, is a most suitable location for high quality mix use development, to support its international let alone national significance.

Question 17

Do you agree with the proposed policy on Port Salford?

Mostly disagree

What is the reason for your answer?

CPRE supports the principle of Port Salford in providing an integrated tri-modal facility on the ship canal, with excellent rail and road links, enabling the whole of Greater Manchester to benefit from easy port access. However, we highlight that the Green Belt at this location does provide an important 'green lung' function at this location and that additional road based haulage in an area that already has poor air quality and noise performance is not sustainable.

In particular we are concerned that the Port users may in reality not rely equally on road, water and rail based modes of transport. We would like to see GMCA provide some policy support for equal shares of water and rail based transport, and limit the volume of HGV movements. There should be strict control applied to ensure this reality is a tri-modal development, and not a cover for more road transport in an already heavily congested road space.

We are genuinely concerned that the capacity of the environment is at its limit, and on the adverse impact on the health and well-being of nearby residents. It should only be encouraged for genuine Port and Manchester Ship Canal related development. We are supportive of a potential new station here to enable more sustainable travel to the area.

Question 18

Do you agree with the proposed policy on the Inner Areas?

Mostly agree

What is the reason for your answer?

There is no graphic for the extent of the Inner Areas, and this would help understand the spatial context.

The Policy is rather limited and could benefit from being expanded. Neighbourhood Planning should be referred to as providing an opportunity for improving areas. Community-led regeneration has many economic, social and environmental benefits that could be harnessed. Sustainable modes of transport should be encouraged, but cycle ways and footpaths should be amenable and safe. Everyone living in inner areas needs suitable parks and green space to play in, particularly older and younger age groups.

Question 19

Do you agree with the proposed policy on Northern Areas?

Mostly agree

What is the reason for your answer?

There is no graphic for the extent of the Northern Areas, and this would help better understand the spatial context.

Again the policy wording is rather slim. More information should be included.

CPRE prefers to see brownfield land developed first. Consequently we support the brownfield part of the GM18 Robert Fletchers in Oldham being reused for mixed used development, but we object to the proposed additional Green Belt allocation. This is because it represents urban sprawl in an area, which the revised draft GMSF concedes as a gateway to the Peak District National Park.

Question 20

Do you agree with the proposed policy on M62 North East Corridor?

Mostly agree

What is the reason for your answer?

CPRE is not assured that the jobs growth projection is reasonable (see answers to questions 36-40).

Unfortunately this policy would result in three major sites being removed from the Green Belt as well as significant development on land outside the Green Belt such as the completion of the Kingsway Business Park. The rural area is beloved by the many people who live close by.

Less employment land to accommodate fewer jobs means in our view there would not be exceptional need to justify the scale of release of both Green Belt and ordinary countryside at this broad location for development.

The area is devoid of public transport and the location is inaccessible. Although public transport is noted as needed this ought to be upfront to ensure travel patterns are as sustainable as possible. Quality bus transit between Rochdale and Oldham would be welcomed.

CPRE fears development here will simply fuel unsustainable patterns of growth and will be entirely road based. This is born out of the reality that funding is already committed to the capacity of Simister Island (junction of M62, M60 and M66), due to gridlock as a result of the induced traffic at this location. Further development in the vicinity would cause inevitable problems from a concentration of more road based traffic, much of it HGV causing yet more environmental harm and congestion on Europe's busiest stretch of motorway. CPRE is not convinced this represents sustainable development.

Question 21

Do you agree with the proposed policy on the Wigan-Bolton Growth Corridor?

Mostly disagree

What is the reason for your answer?

CPRE believes that the jobs growth projection is unreasonable (see answers to questions 36-40).

There has been substantial speculative development of B8 warehousing already now sprawling along in ribbons along the M6, M61, and M62 corridors, with substantial harm to Green Belt purpose, which is a nationally significant planning policy designation. There has been no genuine consideration of the cumulative harm. There has been inadequate "duty to cooperate" between neighbouring authorities and an absenteeism in the Secretary of State role, refusing to call in controversial decisions on the grounds of localism, such as at Florida Farm, St Helens.

Hulton Park and Garden is a Registered Grade II English Heritage listed property, in acknowledgement of its significance and rarity. It was designed by famous landscape architect John Emes, and is nationally, and locally significant. It was home to a long line of Hulton's, one of whom gave the charge call for the Peterloo Massacre, which occurred 100 years ago. People do not wish to see it fenced off for only exclusive use by the wealthy, when currently they benefit from it being in agricultural use, with accessible footpaths and bridleways. It is also the site of the Pretoria Pit disaster where 344 men and boys lost their lives, there is a memorial still found there today. People enjoy seeing wildlife in fine countryside near to where they live. A championship level golf course in

this location would mutilate the heritage asset in making the fairways, and other paraphernalia needed for a golf course. CPRE has witnessed the use of golf courses as a means of establishing a land use, in preparation for a later residential application. In our view it is simply not a good idea to allow this land use at this location for a great variety of reasons, including local amenity, wildlife, Green Belt purpose, loss of farm land and businesses (of multiple generations), etc.

We are pleased to see there are no longer inappropriate housing allocations proposed which would have caused great harm to Green Belt purpose in this location, with the merging of distinct places in Bolton and Wigan.

Hulton Park has been called in for a public inquiry following Bolton Council's decision to allow a major golf course and 1,000+ houses (not a single affordable one). Hulton Estate Area Residents Together (HEART) are the Rule 6 Party, which make the case of the inappropriateness of this development on a variety of grounds to the Secretary of State, and it being contrary to a national designation. The lack of any affordable housing and other developer contributions is too great a price to pay, as if it is not forthcoming here it is displaced elsewhere. From start to finish the application is not sustainable and is opposed by a great many politicians and the people they represent. Naturally, CPRE is pleased to note the previous proposed allocation for housing at Hulton Park has been removed. We congratulate GMCA for this improvement.

Question 22

Do you agree with the proposed policy on Southern Areas?

Mostly agree

What is the reason for your answer?

We agree that "The economic competitiveness, neighbourhood quality and environmental attractiveness of the southern areas should be protected and enhanced.

There is no map to illustrate the extent of the urban expansion into rural parts of Greater Manchester. Please provide a plan for the next stage of the framework

Question 23

Do you agree with the proposed policy on Manchester Airport?

Mostly disagree

What is the reason for your answer?

CPRE believes that doubling the amount of passengers at Manchester Airport would exceed Greater Manchester Combined Authority's own environmental limits. This is not only in terms of global issues such as climate change and the use of finite oil resources, but also because of the direct impact on the surrounding countryside in Greater Manchester and otherwise tranquil areas, such as the Peak District National Park. The air quality, the landscape and tranquillity are already noted in the Revised Draft Greater Manchester Spatial Framework as suffering.

Continued expansion is unsustainable even with technological improvements. We believe that the Government is failing to promote alternatives to flying. Ferry services are being cut back, while once promised long-distance rail services from the English regions to destinations across Europe are still not being provided. Meanwhile millions of pounds are being pumped into airports in grants and hidden subsidies. As a result, many people are opting for planes simply because this is easiest and cheapest.

The Policy GM-Strat 10 Manchester Airport, refers to public transport enhancement and this part of the policy we do support. Whether HS2 would support a modal shift from air to rail, and road to rail, is hotly contested. It would provide an alternative route between the north and south, but CPRE is yet to be convinced that the environmental cost of running trains at very high speeds, or locating stations in the Green Belt, along with the destruction of miles of green space to accommodate the track and other infrastructure has a beneficial balance. We must ensure stations are placed within places with a concentration of population and ensure new clean energy projects are harnessed to mitigate harmful impacts.

CPRE has retained objections on the loss of farmland to enable growth of “Airport City”, which we believe will undermine the Core Growth Area, including Manchester City Centre and Salford Quays. We believed B8 uses around the airport, which are not even ring-fenced for airport related businesses are unsustainable, and there are swathes of brownfield land that are more suitable. Jobs in B8 are forecast to become obsolete, with some of the largest premises housing teams of robots to replace human counterparts in this stage of the supply chain.

Question 24

Do you agree with the proposed policy on New Carrington?

Mostly agree

What is the reason for your answer?

CPRE supports the reuse of previously developed land in advance of greenfields. We are pleased to see the extensive former Shell Carrington industrial estate brought forward to deliver needed jobs and houses and note that part of the site is safeguarded, and therefore that the principle of future development is already accepted. However, we do object to Green Belt land release at the new settlement and we have concerns at the detrimental environmental impact of developing farmland, and (UK Biodiversity Action Plan) priority habitat, that is currently designated as Green Belt. Consequently, CPRE recommends that a much smaller site should be allocated and we advocate the use of a masterplan or Supplementary Planning Document (SPD) that has been approved by the local authority should be required and that the affordable housing contribution should be in excess of 30%. GMCA should consider net gain, as if priority habitat is involved and the proposed development leads to the loss of or damage to it then it would be against NPPF para 174 and some allocations may be unsound

Due to the poor current public transport links, we think it is vital that this should be provided upfront, so that sustainable behaviours of new communities are encouraged as soon as possible.

Question 25

Do you agree with the proposed policy on Main Town Centres?

Agree

What is the reason for your answer?

CPRE campaigns for the protection and enhancement of rural places, but sees the regeneration of urban places as key to this aim. Continued public investment in existing town centres is crucial, to ensure the quality of life for residents is maintained, so people can grow old in Greater Manchester. It is sustainable to concentrate growth in places with good public transport links and existing infrastructure. It can make neighbourhoods more liveable.

Question 26

Do you agree with the proposed policy on Strategic Green Infrastructure?

Agree

What is the reason for your answer?

CPRE agrees that the four green infrastructure assets are key features that ought to be protected and enhanced. We would recommend adding the word “hedgerow” to bullet point 4. Trees, woodland, and hedgerows. Many people are unaware of the Hedgerow Regulations 1997 and the responsibility of maintaining significant hedgerows.

Question 27

Do you agree with the proposed policy on a Sustainable and Integrated Transport Network?

What is the reason for your answer?

Agree

CPRE believes it is more sustainable to plan new development to benefit from sustainable and integrated transport. We recommend that the wording be more specific that an ambitious programme of investment in our public and sustainable transport network will be crucial to ensure more people have access to high quality, high frequency, easy-to use, public transport services, and benefit from healthy and active streets. We must curb polluting, motor powered road-based transport due to the negative impacts to air and noise pollution.

Question 28

Do you agree with the proposed policy on Sustainable Development?

Agree

What is the reason for your answer?

Too often in the past economic factors were the focus, and we like that the Revised Draft quotes the National Planning Policy Framework, 2018 paragraph 7 in explanation to the Policy GM-S 1 Sustainable Development.

In addition the preference given to using previously developed (brownfield) land is applauded by CPRE. As mentioned in our covering letter, the improved focus on brownfield land reuse will ensure that the countryside of Greater Manchester is better protected and enhanced for future generations. The benefits of the rural landscape are wide and include related jobs in farming and food production, natural capital services, including a network of habitat for our wildlife, and flood-resilience to assist climate change adaptation

Question 29

Do you agree with the proposed policy on Carbon and Energy?

Agree

What is the reason for your answer?

We agree whole-heartedly with the delivery of a carbon neutral Greater Manchester no later than 2038. This shows great leadership.

Paragraph 5.12 refers to exploration of hydrocarbons and it says it will not support hydraulic fracturing. Given climate change impacts, the outstanding issues with environmental regulation and unpopularity of shale in places applications have been sought we agree this is a good intention not to support shale exploration, but recommend reference is to any type of exploration, including shale acidisation (the ugly little sibling of fracking.) So please do refer to all shale exploration, rather than just fracking.

We are concerned the loss of land at Chat Moss is contrary to bullet 6.

Question 30

Do you agree with the proposed policy on Heat and Energy Networks?

Agree

What is the reason for your answer?

Heat networks are identified as having great potential to reduce emissions, therefore it is reasonable to have a strategic policy to promote it across Greater Manchester.

Question 31

Do you agree with the proposed policy on Resilience?

Agree

What is the reason for your answer?

It is reasonable for the Combined Authority and constituent authorities to plan for a more resilient Greater Manchester in the future, given what science is telling us about climate change impacts.

Question 32

Do you agree with the proposed policy on Flood Risk and the Water Environment?

Agree

What is the reason for your answer?

The policy for flood risk and water environment seems reasonable. Bullet 6 is especially welcome as CPRE believes an opportunity to remediate contaminated land exists to remove urban diffuse pollution and to realise the development potential of more brownfield for the benefit of the environment and the delivery of needed development.

Question 33

Do you agree with the proposed policy on Clean Air?

Disagree

What is the reason for your answer?

This policy is significantly weaker than the Policy SI1 that the Greater London Authority is currently consulting on, which calls for major developments to be air quality neutral, for all developments to avoid a further deterioration in existing air quality, and to avoid creating any new areas that exceed air quality limits. By contrast the GMSF policy is at best a weak list of mitigation measures and in particular seems to be happy for polluting development to be allowed provided that the pollution is monitored - see point 3 in the policy. CPRE recommends that the policy is significantly strengthened, and in the light of air quality considerations the GMCA should look again at its Green Belt allocations. Many of these are likely to be car or lorry dependent and so will lead to worsening air quality.

Clean air is vitally important for the health of the environment and the people and nature that are located within it.

The expansion (doubling of volume) of the airport and some road investment appears at odds with the clean air policy GM-S6.

Question 34

Do you agree with the proposed policy on Resource Efficiency?

Agree

What is the reason for your answer?

CPRE campaigns for best practices in minerals and waste planning so is pleased to see the inclusion of GM-S7.

Question 35

Do you have any further comments on the policies and overall approach proposed in A Sustainable and Resilient Greater Manchester?

Given the ever increasing and compelling scientific data and analysis on climate change, and the need for change in planning for more sustainable development and resilience, it is absolutely right that GMCA includes the policies in this section of the Revised Draft Framework, and CPRE welcomes all of the policies contained.

Question 36

Do you agree with the proposed policy on “Supporting Long-Term Economic Growth?”

Mostly agree

What is the reason for your answer?

Dr Appleton and Mr Milway, two expert economists were commissioned by CPRE to give an independent economic overview of the Revised Draft GMSF and its evidence base.

They agreed that the Revised Draft GMSF is right to focus on the city centre, but that it needs to ensure there is sustainable development to promote efficient travel-to-work patterns across the region. They recognise there is a balance between maximising the assets in the city centre because of the excellent transport links, but also ensuring development spreads out to the town centres.

The employment land strategy appears to aim to offer developers (and businesses) an extensive range of sites so that there is always a desirable site for developers. Securing growth by offering a wide range of choices to developers may be an okay short-term target if the land is available, but the longer-term strategy should be to try and rebalance the economy within Greater Manchester - and encouraging growth into areas that need it.

Creating the airport as a new economic focus was a strategy that was specifically refuted by the planning inspectors who sat in judgement of the, since revoked, North West Regional Spatial Strategy. The Inspectors said, and the expert economists agree with them, that it could draw development away from other parts of the conurbation - and also from the nearby towns in Cheshire East such as Wilmslow and Macclesfield .

There could be more focus on driving economic growth in the town centres by, for example, bringing-back into use retail units as flexible work space for start-up industries.

They would like to see how the town centres will benefit from the recently announced £1.6bn town centre regeneration fund. Greater Manchester has a fantastic opportunity to

deliver more regeneration of sites and build speculative sites for development within the existing town centres. They would like to see more focus on this in the SF.

They think the Revised Draft GMSF needs to build on the strengths of the conurbation to address the productivity challenge we have in Greater Manchester both between the north and south of the region, and nationally. The internal disparity within the region needs to be addressed, but they question whether there is sufficient plans to address these productivity gaps.

CPRE broadly accepts the professional opinion of Dr Appleton and Mr Milway. We completely agree that GMCA should plan for economic growth and tackle the productivity lag, which is 10% lower than the national average. But, if the figures do not stack up, because the ambition is unreasonable, then we make the case that the amount of development being planned for B1, B2 and B8 should be reduced. An adverse impact of over-planning is that the commercial property market can be driven down, and a result can be considerable site vacancy, which leads to low values and areas being blighted.

We do recommend Policy GM-P1 B includes the value of the food and drink sector to Greater Manchester as we understand it is a thriving and productive economic sector.

Also F 1v Manchester Airport, vii Northern Gateway and viii M6 Corridor would cause needless harm to Green Belt.

Question 37

Do you agree with the proposed policy on Employment Sites and Premises?

Mostly disagree

What is the reason for your answer?

Dr Appleton and Mr Milway, two expert economists were commissioned by CPRE to give an independent economic overview of the Revised Draft GMSF and its evidence base.

They found that the overall quantum of employment sites required appears overly high. The total demand is high and may result in an over-allocation of sites, which could impact on the viability of the less favourable sites to come to the market.

On a twenty year view it appears that there are too many sites and premises allocated, and the allocations do not pay enough attention to recognising new brownfield sites (in favourable locations) that will come forward as businesses turnover within Greater Manchester.

There is a balance to be struck between giving industry a choice of location to ensure the economy continues to grow, but also restricting sites so industry does not alone dictate the pattern of development - particularly in the medium to long term.

They believe few industries look further than 5 years ahead in their location decisions, and therefore propose that a more appropriate approach in the GMSF is for sites to be phased in to use. Likewise, a phased approach also allows for new brownfield sites to come

forward as businesses vacate them - therefore adding to the supply of sites and reducing the need to use Greenfield sites.

They think it would be prudent that Greenbelt sites are safeguarded until a threshold in take-up of other sites has been met.

There does not seem to be much alignment between the Greater Manchester economic strategy and the location of employment sites.

The justification for the Greenbelt release does not seem to fit with the wider objectives of the GMSF.

Need more detail on the complementary locations to the strategic sites. There is reference to the “selective removal of land from the Greenbelt”, they put forward the view that the GMSF should minimise the need for Greenbelt release, especially that around the Airport Enterprise Zone.

Question 38

Do you agree with the proposed policy on Office Development?

Mostly agree

What is the reason for your answer?

Dr Appleton and Mr Milway, two expert economists were commissioned by CPRE to give an independent economic overview of the Revised Draft GMSF and its evidence base.

They agreed that Manchester City Centre is likely to be the prime location for office market development. Current office development in the city centre is at a high density. The proposed densities outlined in the GMSF are less than half of current development, and they think could under-estimate the potential of the sites proposed, and over-estimate the demand for them. They think the GMSF should increase density levels to match current development to ensure sites remain viable for developers.

The concern about a shortage of “Grade A” office space is probably misplaced. The low vacancy levels within the Grade A office space reflects the incentives that new buildings offer tenants to move into these premises. Therefore you would expect most Grade A space to be occupied, as landlords and developers seek to recoup their investment.

They also agree with the numbers proposed, but do not think they are allocated in the right places. They think there is an over-allocation in the city centre.

There is an obvious need to accommodate market demands, but there is also an incentive to ensure existing space in the city and town centres is regenerated and used optimally.

It is not likely that the proposed office development in Rochdale, Oldham and Wigan will be needed at the levels outlined in the GMSF due to the economic trends of these areas.

The GMSF does not appear to incentivise developers to go out of Manchester, and the economists think more could be done to promote office development in the town centres.

The GMSF does not address how much office space is currently being converted into alternative uses both within Manchester City Centre and the town centres. There is no analysis of what is expected to happen.

Consequently, CPRE retains the opinion that 2,460,000 sq metres of new office floorspace is excessive. Because Manchester Airport has good links to Manchester City Centre and Salford Quays, we object to it being promoted as an office location in its own right. The “Airport City” concept will have the effect of attracting business away from existing centres and will induce investment around the airport. This displacement is unsustainable as the airport is not as well served in terms of accessibility by all forms of transport, and it puts pressure on rural development and is causing urban sprawl around the airport and in East Cheshire.

We object to any release of Green Belt protected land for the supply of office premises as we believe there is adequate capacity on previously developed land, especially in Bury, Oldham, Rochdale and Wigan. We are pleased to note that all B1 uses in Stockport and Tameside are focused on brownfield sites.

Question 39

Do you agree with the proposed policy on Industry and Warehousing Development?

Disagree

What is the reason for your answer?

Dr Appleton and Mr Milway, two expert economists were commissioned by CPRE to give an independent economic overview of the Revised Draft GMSF and its evidence base. They made the observations below concerning industrial and warehousing development.

New industrial space is currently proposed as being in high demand in the GMSF, yet 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. The GMSF needs to respond to the challenge of ensuring businesses are able to find appropriate premises while managing the likely overall reduction in amount of occupied industrial space. Current analysis in the GMSF appears to only include gross demand for new space and does not consider business turnover rates in the region, which reflects how the development market works.

In the industrial sector, there has been an annual decline in the amount of floorspace occupied in Greater Manchester each year for the 15 years between 2000/1 to 2015/16 (using Valuation Office Rateable Floorspace statistics)¹ and this is expected to continue (the employment forecasts expect a further 30% decline in manufacturing employment by 2038) - so there should be a lot of vacant space becoming available over the period which could be added in - typically known as ‘windfall sites’.

Over the 15 years there has been a net reduction in the amount of rateable industrial space of 4.6 million sqm. We expect that a significant proportion of this former industrial space now makes up the portfolio of brownfield sites proposed for redevelopment. Given the employment forecasts, we expect that this trend will most likely continue. Without an

appropriate strategy to manage existing industrial areas there is a risk of a continued expansion onto new sites while leaving older sites vacant and derelict.

There is concern that the estimate of need for more industrial floorspace is over inflated to build-in too many upward adjustment factors (adjustments to account for the recession, allow for margin and allow for flexibility). We suggest that the 25% uncertainty in the market could be managed in different ways, whilst allowing flexibility in the marketplace.

The quantum of industry and warehousing sites is inflated over a 20 year period. The total amount of space required is likely to be less, and potential windfall sites need to be factored into the analysis. The result of the current strategy to provide a large number of new industrial sites could result in an increasing volume of vacant or derelict brownfield sites.

We would like to see phasing of any new sites to ensure prime sites are prioritised. There needs to be more focus on short to medium term needs, rather than the longer-term needs to ensure sites are sustainably phased into use.

Growth is focussed on logistics, which is not typically high skilled, and high value, despite the GMSF focussing on addressing the productivity gap.

CPRE reiterates that 4,220,000 sq metres of B2 Manufacturing and B8 Warehousing is excessive, particularly for Manchester, Rochdale, Tameside and Wigan and we recommend that a lower amount of employment development is planned.

We also believe the brownfield preference should apply equally to Manufacturing and Warehousing, whereas only 50% is focused on brownfield land reuse. More ambition to deliver B2 and B8 employment uses on previously used land should be shown in the next version of the GMSF. Manchester, Salford and Wigan have the largest amounts of brownfield land that needs to be reused as a priority.

We know from the previous round of public consultation that the principle of Green Belt is well understood and local people do not want Green Belt land to be released and allocated for development.

Question 40

Do you have any further comments on the policies and overall approach proposed in “A Prosperous Greater Manchester?”

Dr Appleton and Mr Milway, two expert economists were commissioned by CPRE to give an independent economic overview of the Revised Draft GMSF and its evidence base. We attach their report in Appendix Two for information.

In short, they found the objectives outlined in the GMSF broadly align with those of CPREs, in terms of reducing inequalities, improving prosperity, promoting sustainable movement of goods, people and information and moving towards a carbon neutral region.

On the one level the GMSF uses a very simple and clear way of forecasting future demand, essentially using past trends in the amount of floorspace completed each year and adding

50% to allow for flexibility/choice, uncertainty and growth. However, there is no real transparency into the assumptions that arrive at the numbers being used and it is not clear whether the basis of the estimates of past trends in floorspace completions represents net additional floorspace, or if it relates to transaction data, which includes both movement within GMSF and might also include businesses moving into older premises. In addition, even if the take-up data only represents businesses moving into new build, this methodology of forecasting demand is likely to give a highly inflated figure of demand over 20 years.

They found some of the analysis in the GMSF also presents inaccurate figures - e.g. para 6.13 of the employment chapter refers to a combined effect of margin/uplift and flexibility of choice resulting in a 45% combined effect - this actual figure is 50%.

Greater Manchester Combined Authority acknowledge that the 50% flexibility factor is towards the upper end of that used in other employment land studies - in fact we think it is at the top end- so is quite an extreme figure.

Using past annual take-up figures to guide how much land could be required annually is probably sensible - but summing that over the 19 year period is going to give far too much land - because it does not allow for the space that becomes available as businesses move from one location within Greater Manchester to another.

The employment forecasts and employment strategy are referenced within the GMSF, but we have struggled to understand how these figures are used to inform the demand assessment.

They think GMCA should at least acknowledge the expected trends and how their demand forecasts will accommodate their economic strategy.

The Accelerated Growth Scenario presented as reflecting the ambitions of the Greater Manchester strategy implies an increase in employment over the policy neutral forecasts of 82,000 jobs resulting in an additional 56,000 residents in Greater Manchester by 2038. Therefore much of the additional growth generated by the strategy is expected to attract more in-migration into the conurbation. There could be a real concern that if the strategy does not generate the extra employment above the expected growth rate, then any housing allocated to support employment that does not materialise, will actually dilute the current employment rate.

The economists are concerned about the assumptions that have been used to arrive at the target economic growth, and the translation of that into development sites. For example, the ratio of floorspace to land area for office development in Manchester

They support the focus of new development on brownfield sites, but not enough consideration is given to 'new' brownfield sites as businesses turnover in the region.

The "...Prosperous Greater Manchester" section of the Revised Draft GMSF represents a substantial threat to Green Belt purposes across Greater Manchester. Over-planning for jobs, has the consequence of pushing up the housing requirement figure, and so housing is over-planned too. Many people, including members of CPRE see the figures being proposed as excessive, particularly given the decline of traditional industry and economic

uncertainties. CPRE wishes rural economic sectors, such as agriculture to be properly valued, as the section reiterates the need for maintaining “a very high level of economic diversity”.

Question 41

Do you agree with the proposed policy on the Scale of New Housing Development?

Mostly agree

What is the reason for your answer?

The proposed housing requirement for Greater Manchester of 201,000 net additional dwellings from 2018 to 2035 (19 years) appears excessive.

At the Draft GMSF consultation the housing requirement for Greater Manchester for a twenty year period was 227,200. CPRE included an independent demographic appraisal that showed actual flaws in the calculations in the region of 30,000 too many homes being planned for. This was based on the very high economic growth rates.

CPRE is pleased to see the housing requirement for Greater Manchester has been reduced in the region of 26,000 homes, however we believe if realism is applied to the jobs growth requirement, based on more likely economic growth, rather than ‘pie in the sky’ astronomical growth, then there is an opportunity to downwardly adjust the housing requirement, and in doing so save more greenfield land from development.

Paragraph 7.6 refers to GMCA relying on the 2014-based demographic projections, which the Government in February 2019 announced it would continue to use.

The Government’s decision is disappointing, as despite most respondents to its consultation opposing the use of out of date 2014-based demographic projections for calculating housing requirements, it still chose to ignore common sense and instead bias the interests of developer interests who have a commercial interest in the use of higher 2014 data.

We think GMCA should plan on the basis of up to date figures and demonstrate exceptional circumstances for using its own method. Andy Burnham’s recent comments, calling out Kit Malthouse the Housing Minister “Under pressure from Conservative backbenchers, it would appear that the Government is trying to soften its line on housing numbers and greenbelt and deflect blame towards councils. It is unfair and dishonest,” are acknowledged by CPRE. But we think GMCA shouldn’t simply give up on the issue, rather it should assert its discretion over housing numbers which was suggested by the Minister. The Minister said the Government’s own national planning policy guidance says local authorities are ‘expected’ to use centrally-set methodology to work out many houses they will need in the coming years, and only allows them to deviate from that ‘in exceptional circumstances’. CPRE believes there is ‘exceptional circumstance’ for a reduced number of houses given Green Belt purpose would be substantially and significantly harmed.

The 2018-based projections are likely to be published by about September 2020 based on the normal timescales for this work. A more locally-true version will be more robust than

an already out of date national projection, which will be superseded further by the time the final GMSF is expected to be published.

As previously stated, CPRE believes that the standard method for the estimation of local housing demand is deeply flawed, and in our response to the Government's recent consultation on its proposal to retain the use of the 2014-based household projections we said it "is a fudge of staggering ineptitude". We maintain this view.

It is a general requirement of national planning policy, as explicitly stated in para 31 of the NPPF, 2018, that the "preparation and review of all policies should be underpinned by relevant and up-to-date evidence". The Government's current proposal amounts to a declaration that an exception to this general rule should apply where the outcome of doing so would suit the Government, and that policies should in fact be based on cherry-picking the data that best fits this week's ministerial priorities.

CPRE believes GMCA should use a housing method that best responds to genuine local need and justify its use to Government. The Government's own standard approach is deeply flawed.

Question 42

Do you agree with the proposed policy on the affordability of new housing?

Agree with the ultimate aim of providing an adequate supply of affordable housing, but not with the false premise that building more houses results in more affordable housing. The property market does not operate as simply as that, due to homes being bought as capital investments rather than just as a property to dwell in.

What is the reason for your answer?

CPRE agrees that all households ought to have access to a decent home. Unfortunately, building more housing, particularly by releasing land in the Green Belt will not necessarily equate to households without access to a decent house being housed. Oliver Letwin's report of 2018 on build-out rates found that the largest housebuilders are consistently delivering expensive homes - and only as fast as the open market can absorb them - without lowering prices. This business model fails to result in the reduction in house prices, a premise that is wrongly assumed by policies which promote high housing numbers as a solution to the affordability crisis.

Also, people and companies are increasingly using houses as an investment, and are renting out homes. The price and standard of private rental homes might be respectively too high, and too poor, causing many households to aspire to a council owned property. Nevertheless, 30,000 priority households on the local authority waiting list of 85,000 homes is a sobering statistic.

The enforcement of affordable housing contribution is a key element. Since the introduction of the Government's NPPF in 2012 and revision of 2018, we have seen developers routinely renege on agreed contributions on the basis of their viability. So GMCA needs a well worded policy to counter the weakness inherent within national planning policy.

Question 43

Do you agree with the proposed policy on the Type, Size and Design of New Housing?

Agree

What is the reason for your answer?

GM-H3 is, overall, a good planning policy aimed at securing a wide range of dwelling types and sizes to meet identified local need, including specialist homes for the elderly and those with additional needs.

We applaud paragraph 7.23 and it is this type of policy explanation that the policy GM-H3 will be tested against in the future, but recommend this wording is incorporated into the actual policy wording rather than just the explanatory text.

The Review of Build Out led by Sir Oliver Letwin MP and commissioned by the Government may offer GMCA leverage to gain further powers to increase the rate of housebuilding within Greater Manchester. The Review recommends further powers for local authorities in areas of high housing demand to cap development land values on large development sites and take a more direct role in developing these sites so that there is a greater mix of housing types delivered than has been seen in recent years. Based on the latest (2017) Office for National Statistics figures on the ratio of median house prices to median residential incomes, at least two areas of Greater Manchester - Stockport and Trafford - can already be considered 'high demand areas' in terms of the definition Letwin uses as they have a ratio greater than 7:1. Two further areas - Manchester and Salford - have a ratio above 6:1. In any case, the new powers Letwin recommends would be of direct relevance to achieving GMCA objectives for affordable housing delivery in particular and we would therefore recommend that GMCA presses central Government to apply the Letwin recommendations within and across Greater Manchester.

We welcome the overall approach to design. However, the draft policy refers to 'the principles of good design' but does not explain what these are. We would recommend a cross-reference at this point to Policy GM-E1 which includes a number of points that we would understand to be good design principles. Elsewhere the draft GMSF refers to 'active design' without explaining what this means; if a reference to Sport England guidance is intended then this should also be made clear - see our response to Question 62 below.

Question 44

Do you agree with the proposed policy on the Density of New Housing?

Agree

What is the reason for your answer?

Housing density can really help deliver housing where it is needed.

Question 45

Do you have any further comments on the policies and overall approach proposed in Homes for Greater Manchester?

CPRE agrees that all households ought to have access to a decent home. Importantly, planning for housing must be based on robust evidence, and this means the 2016-based household projections ought to be relied upon, as referred to more comprehensively in our answer to Question 41, where we refer to Kit Malthouse, Housing Minister’s advice to Andy Burnham on Inspectors accepting a “properly evidenced and assessed variation” from the target, adding “If, for example, you have constraints like Green Belt, you can justify a lower number, then an inspector should accept that”.

The brownfield preference is supported by CPRE, and should be meaningfully supported by the use of appropriate brownfield targets. The lack of a target means there is no performance monitoring. The former North West Regional Spatial Strategy (RSS) had high brownfield targets that councils were successfully achieving. There needs to be an incentive to restrict greenfield allocations and unlock the potential of previously used land.

The Revised Draft GMSF lacks a strategic policy for the housing land supply, although there is a similarly named sub heading and explanation. CPRE is concerned that at 11 Mar 2016, Cllr Sue Derbyshire, then leader of Stockport Council and Greater Manchester Combined Authority’s planning lead, spoke at the Place RESI conference, and said, “There are 47,000 units that have permission in Greater Manchester and haven’t been progressed, and we need to ask why?” She warned: “A plan doesn’t produce houses, even a plan that includes lots of sites.” <https://www.placenorthwest.co.uk/news/place-resi-we-need-more-than-a-plan-to-build-houses/> .

The adopted Greater Manchester Spatial Framework should have sustainable development at its core, it should recycle and reuse land before needlessly sprawling out into countryside areas. CPRE encourages real ambition on this issue and calls for GMCA to work with all partners to unlock the development potential of sites currently constrained. We have accordingly recommended that the GMCA looks to take advantage of the recommendations of the Letwin Review of Build Out, in our responses to Questions 10 and 43 above.

Furthermore, if the private sector is reluctant to follow a brownfield preference approach perhaps the Mayor and Combined Authority can rely on new models of unlocking the potential of constrained sites with community-led trusts taking a lead role. The development industry should not be allowed to dictate the unsustainable location of new housing development across Greater Manchester because of their land interests rely on farmland in Green Belt.

Question 46

Do you agree with the proposed policy on Valuing Important Landscapes?

Agree

What is the reason for your answer?

The countryside has intrinsic value, including the beautiful, scenic and varied landscapes that all people can freely enjoy, devoid of built intrusions. We agree with the characteristics having regard to the aspects as set out under Policy GM-G1. We also

welcome the policy's approach of seeking biodiversity net gain and landscape enhancement to be done in conjunction. We also believe that the draft net gain policy should have a similar approach - see our response to Q.55 below.

Question 47

Do you agree with the proposed policy on the Green Infrastructure Network?

Agree

What is the reason for your answer?

CPRE wants urban places to benefit from adequate green infrastructure, as all people should enjoy the benefits, such as to health and well-being and, from spending time in natural green spaces. We think the GMSF should 'bring the countryside into the city'. We recommend reference to hedgerows, as opposed to hedges, and importantly to the Hedgerow Regulations 1997

<http://www.legislation.gov.uk/ukxi/1997/1160/schedule/1/made> as this offers statutory protection in recognition of the importance to local archaeology and history, and Wildlife and landscape. Communication of the societal value of hedgerows, and the other natural elements that combine under the title of green infrastructure is important. It is good that the policy makes reference to the Greater Manchester Landscape Character and Sensitivity Assessment.

Question 48

Do you agree with the proposed policy on River Valleys and Waterways?

Agree

What is the reason for your answer?

CPRE applauds the achievements of the Mersey Basin Campaign and the North West River Basin Management Plan and the standards set through the European Union Water Directive. In the future the quality of river valleys and waterways should continue to improve, but it can only be achieved if all partners involved are led by robust spatial plan policies.

We love that open character is to be retained and that public enjoyment of river valleys and waterways will be promoted. We want the GMSF to enable better accessibility by 'bringing the countryside into the city'.

It is right that the mosaic of semi-natural habitats, and areas of tranquillity are protected,

Question 49

Do you agree with the proposed policy on Lowland Wetlands and Mosslands?

Agree

What is the reason for your answer?

CPRE agrees that lowland wetlands and mosslands are a priority habitat that must be protected in the future, and they are one of Western Europe's rarest and most threatened habitats. The Greater Manchester Wetlands Nature Improvement Area (NIA) is valuable in this regard.

Paragraph 8.6 gives reference to the restored industrial landscapes of the wetlands, such as the flashes in Wigan, which provides an important recreational resource, with a network of public rights of way. The Heritage Lottery funded Carbon Landscape project is applauded as CPRE wants to see people better connected to their landscapes, to be aware of amazing wild oases on their doorsteps.

The remediation of land is also supported, for green infrastructure where there is a need or value.

However we are concerned at the reference in 8.27 to some sections of undeveloped mossland being considered appropriate for future development and we object to this. This commentary should be deleted to best protect this rare and threatened habitat.

Question 50

Do you agree with the proposed policy on the Uplands?

Agree

What is the reason for your answer?

Upland areas of Greater Manchester are valuable not least for their intense rural character and spectacular panoramic views, which in a large part exist because of the successful work of CPRE with local planning authorities over the past 90 years.

There is an absolute tension with allocating land in upland areas for development, and therefore we vigorously object to any proposal that would harm upland areas. In our view uplands ought not to be built on or otherwise developed. Rare species and significant volumes of carbon exist in the upland areas. The GMSF must offer the best planning policy protection and encouragement of habitat restoration that is possible.

We welcome the new commitment to avoid Green Belt release in the uplands, although as we set out elsewhere, we would question whether there is in fact a need to release any Green Belt. There is scope for the Green Belt to become more valuable over time. As the maps we submitted to the Glover Review (also mentioned under Question 54) show, the Peak District National Park is less accessible to the west of the conurbation, and it is in these areas that the Green Belt contains the most accessible countryside for local people.

Question 51

Do you agree with the proposed policy on Urban Green Space?

Agree

What is the reason for your answer?

This is a very well-considered policy.

CPRE believes paragraph 8.33 should be corrected to say urban green spaces are of equal weight to areas of open countryside. Both types should be best protected and enhanced in the future, as both contribute positively to people, and importantly the economy.

We agree that densely developed urban areas need 'quality' accessible green space, and agree brownfield land should be reused for urban green space where deficiencies exist. Importantly, once a previously developed site 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.

Question 52

Do you agree with the proposed policy on Trees and Woodland?

Agree

What is the reason for your answer?

Please title Policy GM-G7 Trees, Woodland and Hedgerows (refer to CPRE answer to Question 47)

Greater Manchester should be congratulated for progress on tree and woodland planting and enhancement over the past couple of decades. The urgent need to combat climate change and tackle air pollution means we need to be even more ambitious with our strategies and planning policy in the future.

Question 53

Do you agree with the proposed policy on the Green Infrastructure Opportunity Areas?

Agree

What is the reason for your answer?

Opportunities to support the Greater Manchester Green Infrastructure Network must be sought. Please delete 'wherever practicable' from explanation in paragraph 8.44 as developers will use it as a reason not to deliver on this.

G. Hulton Park in Bolton is the subject of a major application for a Ryder Cup Championship golf course and in excess of 1,000 houses, complete with hotel, conference centre, golf academy, etc which will completely destroy woodland and important habitats, not least the registered grade II heritage property of the park and gardens. CPRE is supporting the Rule 6 Party (Hulton Estate Area Residents Together HEART) against Bolton Council (which has approved the application by Peel) at the Call-In Inquiry scheduled for October 2019. We seek GMCA's support for opposing the harmful development alongside the local community, which is vociferously opposed to the loss of this important green infrastructure opportunity area, including farmland in protected Green Belt.

There is also conflict at Carrington as although CPRE supports the reuse of brownfield land, it is opposed to the expansion of the site into Green Belt, as it will harm rare and threatened lowland wetland and mosslands at Chat Moss. CPRE is strongly opposed to the loss of greenfield land for development at this location.

Question 54

Do you agree with the proposed policy on Standards for a Greener Greater Manchester?

Agree

What is the reason for your answer?

CPRE agrees that the GMSF should green Greater Manchester in the future. We endorse the 25 Year Environment Plan of Government aimed at leaving our environment in a better shape than we found it. We believe that it is important that the GMCA develops an evidence base on whether and how the Accessible National Green Space Standard is being met within the GMCA area. This is so that both urban green spaces and accessible areas of Green Belt are properly accounted for and valued. At present we believe that both are undervalued.

Question 55

Do you agree with the proposed policy on the Net Enhancement of Biodiversity?

Disagree

What is the reason for your answer?

Net Enhancement of Biodiversity is supported by CPRE. However, we believe that the best approach to net enhancement involves a holistic understanding of landscape character, culture and heritage - for example, improvements to biodiversity should not also help safeguard, and not come at the expense of, recognised heritage assets or important views. We therefore recommend that the policy should cross-reference the current Policy GM-G1 on landscape - just as that policy currently cross-references net enhancement of biodiversity.

We entirely disagree with paragraph 8.53 assertion that given the overall scale of development that needs to be accommodated a limited amount of development on high grade agricultural land is likely to be necessary, and we request that this phrase be deleted. High grade farm land is a national asset and it is important for future generations for food production. It must not be so easily sacrificed.

The scale of development needed has been wrongly identified as too high and we show in our answers under housing and economic policies why it should be reasonably reduced.

We are concerned that certain compensation cannot reconcile harm, such as to peat loss.

Question 56

Do you agree with the proposed policy on the Greater Manchester Green Belt?

Agree

What is the reason for your answer?

CPRE is delighted that Greater Manchester Combined Authority led by Andy Burnham, Greater Manchester Mayor has listened to us, and the 27,000 consultees, the vast majority

(93%) of respondents who strongly opposed the large scale of Green Belt release proposed in the draft Greater Manchester Spatial Framework, and consequently, the amount of Green Belt proposed for development in the Revised Draft GMSF has been halved.

The net amount of Green Belt land proposed for release is 2,419 hectares - this means a 4.1% reduction in the size of the Green Belt compared to 4,900 hectares or 8.2% in 2016.

That said, CPRE hopes to see a further reduction in the amount of Green Belt land lost to unnecessary development, by challenging the ambitious growth rate assumed for jobs and housing, and we will respond accordingly, and encourage people to reiterate reasoned planning arguments to minimise Green Belt development, and increase the reuse of brownfield land.

Green Belt is after all, permanent. Accordingly, Greater Manchester's Green Belt must be afforded the strongest protection in the future in accordance with NPPF Section 13 to uphold the five purposes:

- to check the unrestricted sprawl of large built-up areas;
- to prevent neighbouring towns merging into one another;
- to assist in safeguarding the countryside from encroachment;
- to preserve the setting and special character of historic towns; and
- to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

We support the positive and beneficial use of Green Belt to increase people's access to green space near to where they live, where this can be achieved without harm to Green Belt's fundamental characteristics, as the draft policy says. We think inclusion of people in the countryside is important. But, the key aspect of Green Belt is keeping it permanently open and it is not mentioned, so we recommend this is referred to in Policy GM-G11.

CPRE strongly objects to allocations for development in land that is currently designated as Green Belt. We make a convincing case that there are not the exceptional circumstances to justify the release of Green Belt across Greater Manchester.

CPRE has provided expert economist evidence that the growth rates for economic development, and consequently the identified floorspace requirement is much too high. There is a direct link between job numbers and new housing required. 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.

CPRE understands that Greater Manchester has enough brownfield land to accommodate the future jobs and housing growth identified. We agree with paragraph 8.57 as it is right that all brownfield land, should be reused in advance of any Green Belt release.

Naturally, CPRE is delighted that the Revised Draft GMSF identifies 69 new Green Belt additions. We do note that some parcels of new Green Belt are spaces such as motorway embankments, and although they can contribute to permanence of open green spaces, and possibly the other five Green Belt purposes, do have limited value to the public in terms of access.

Question 57

Do you have any further comments on the policies and overall approach proposed in A Greener Greater Manchester?

This Section, titled “A Greener Greater Manchester”, is undeniably, a great outcome for the public and all stakeholders who are concerned about the health and well-being of Greater Manchester’s environment and inhabitants. Although we are interested in hearing the response of developers who will no doubt challenge the proposals put forward.

Question 58

Do you agree with the proposed policy on Sustainable Places?

Agree

What is the reason for your answer?

The revised draft GMSF should have a policy about achieving sustainable places. The conurbation should be suitable for older age groups, given the population is aging.

The policy GM-E1 would benefit from a rewrite to mention previously developed land, sustainable transport and health and well-being.

It is good to see reference to efficient use of land under 7B.

We recommend inclusion of “17. Managing the protection and enhancement of rural fringe landscapes and intrinsic value of rural places that can be enjoyed by all of the people of Greater Manchester.”

Question 59

Do you agree with the proposed policy on Heritage?

Agree

What is the reason for your answer?

CPRE agrees that heritage should be protected and enhanced as new development is planned.

Rural places have many ‘signatures’ that can be protected, such as field boundaries, farming, and Public Rights of Way. These combined contribute to distinctiveness and sense of place.

Question 60

Do you agree with the proposed policy on New Retail and Leisure Uses in Town Centres?

Agree

What is the reason for your answer?

We need to revitalise town centres in the context of changing retail patterns. CPRE believes vacant properties, such as those above shops, should be used for housing.

Question 61

Do you agree with the proposed policy on Education, Skills and Knowledge?

Agree

What is the reason for your answer?

Natural green spaces provide opportunities for learning at different levels, primary, secondary, tertiary and higher education. Research based learning is enhanced in outdoor environments.

Question 62

Do you agree with the proposed policy on Health?

Agree

What is the reason for your answer?

We welcome the inclusion of a health policy in the GMSF. However, we would recommend that Health 'and Well-being' should be referred to together throughout the GMSF document.

We also recommend that the policy would benefit from clearer signposting to further sources of guidance. The draft policy refers to 'active design principles' but does not explain what these are. We are assuming that the GMCA is referring to the principles published by Sport England in 2015, and further guidance can be found on its website. We agree with the Sport England principles, but if the GMCA is adopting them as policy then this should be made clearer in the final GMSF.

CPRE acknowledges the added value to health and well-being associated by exercising outside in quality green spaces. Research evidences the benefits, and a great many organisations such as the NHS <https://www.nhs.uk/live-well/exercise/walking-for-health/>, Walking for Health <https://www.walkingforhealth.org.uk/> and Macmillan <https://www.macmillan.org.uk/get-involved/fundraising-events/trekking>, promote the benefits. We support planning policy that will provide green space and green routes for recreation.

Question 63

Do you agree with the proposed policy on Sport and Recreation?

Agree

What is the reason for your answer?

Greater Manchester is world famous for its football, cricket, cycling, netball and many other sports. It should continue to provide the right sports and recreation in the right locations.

There will of course be proposals for sports and recreation developments that are unsustainable, such as the football development proposed at Turn Moss, Trafford which was locally opposed. The same is true of the major golf and housing development proposed by Peel Holdings at Hulton Park in Bolton. We successfully supported residents in Trafford Moss and we shall stand in support of the Hulton Estate Area Residents Together to oppose this inappropriate use of Green Belt. The GMSF should not support the proposals at Hulton Park

A newly devised GM Ringway walk <http://gmringway.org/> could be promoted through the GMSF

Question 64

Do you have any further comments on the policies and overall approach proposed in A Greater Manchester for Everyone?

CPRE agrees that the policies for promoting inclusion of all people in Greater Manchester. Places should be sustainable. Our heritage, retail and town centres should be protected. Education, skills and knowledge should be enhanced. The health and well-being of all people in Greater Manchester should be improved and improved sport and recreation facilities can support this. But, unsustainable development must be guarded against. CPRE couldn't agree more that our countryside and natural green spaces provide real added value and at the core of our values is inclusion and the ability of people to access these spaces in a way that is sensitive to wildlife habitats and farmland.

Question 65

Do you agree with the proposed policy on World-Class Connectivity?

Agree

What is the reason for your answer?

Road traffic must not be allowed to increase. Road transport contributes a third of CO2 emissions, 65% of nitrogen oxides and 79% of particulates. It is linked to 1,200 premature deaths per year.

GMSF must enable a large modal shift through investment in sustainable modes such as walking and cycling and modern public transport systems, particularly areas like Tameside that currently is very poorly served.

The contribution of homeworking to travel reduction and planning of mixed land uses so people can live near to where they work is important.

Question 66

Do you agree with the proposed policy on Digital Connectivity?

Agree

What is the reason for your answer?

Affordable high quality digital infrastructure can support economic growth, whilst reducing development needs, increasing travel demand, and connect isolated rural areas.

The siting of telecommunications infrastructure should be sensitively considered as it can introduce man-made intrusions into otherwise rural landscapes free of development. The landscape sensitivity should be considered and ways to implement improvements without degrading visual amenity.

Question 67

Do you agree with the proposed policy on the Walking and Cycling Network?

Agree

What is the reason for your answer?

CPRE has long campaigned for more sustainable modes of transport. There is increasing research based evidence of the health and well-being benefits of walking and cycling on green routes. But pedestrians and cyclists should feel safe, especially in relation to crime and community safety, which on rural roads can be more severe as drivers continue to drive at high speed irrespective of narrow carriage width and blind bends. Separate space can help this, but so can shared-space with measures to encourage traffic calming, including 'quiet lanes'.

Question 68

Do you agree with the proposed policy on the Public Transport Network?

Agree

What is the reason for your answer?

The public transport network in Greater Manchester outside of some major routes is in dire need of investment by Government in the future, to be comparable to that infrastructure investment that has occurred in London.

CPRE remains unconvinced of placing HS2 stations on land in Green Belt. Should HS2 be delivered we think it is more reasonable to have the city centres of Manchester and Salford connected rather than countryside land near the Airport. Manchester City Centre has good connections via bus, rail and Metrolink to Manchester Airport.

Question 69

Do you agree with the proposed policy on the Transport Requirements of New Development?

Agree

What is the reason for your answer?

CPRE broadly supports Policy GM-C 5 Transport requirements of new developments, as it is right that enough new transport infrastructure is delivered to make places function properly.

Providing shower and other facilities to support more cycling is especially welcomed.

Providing alternatives to car ownership such as car clubs is applauded. So too is the provision of more electrical charging points for electric vehicles

Question 70

Do you agree with the proposed policy on Highways Infrastructure Improvements?

Agree

What is the reason for your answer?

CPRE accepts that a limited amount of improvement may be required to target problems on the existing highway network, but we recommend reducing speeds, and making safety improvements, as opposed to creating new link roads. CPRE has considerable evidence on the issue of inducing more traffic by building new roads and there is an urgent need to reduce our motor dependency.

Twenty years after it was accepted that major road-building didn't work, in spite of all the evidence collected previously, the Government is once again trying to build its way out of congestion. In 2014 the £15 billion 'Road Investment Strategy' (RIS), the biggest roads programme since the 1970s, was announced. It was hailed as the answer to cutting congestion, improving local economies, and all the while ensuring minimal environmental impact. Our 2017 report - The end of the road? Challenging the road-building consensus - has now found the most comprehensive evidence to date that building new roads is not the solution. The research shows that road schemes generate increased traffic in the area in which schemes are built: <https://www.cpre.org.uk/what-we-do/transport/roads> .

Like our colleagues at Friends of the Peak District, CPRE objects to the inclusion of Mottram Moor A5T to A57 link road, further interventions for Tintwistle and Hollingworth and the trans-Pennine Tunnel, which by increasing the capacity for additional road vehicles would conflict with action to achieve climate change goals.

Since the 2016 version of the GMSF, Greater Manchester's Springboard to a Greener City Region has set some radical targets for both people travelling less and decarbonisation of travel, which CPRE welcomes. The Greater Manchester Combined Authority (GMCA) has adopted its own aspirational target of a 48% reduction in carbon emissions by 2020 compared to 1990 levels with a goal to cut emission levels to below eighty to ninety-five percent, or two metric tons per capita, by 2050.

However, this may not be enough. In October 2018 the government requested the Committee on Climate Change (CCC) to consider the tightening of the 2050 '80+' reduction target to a net zero (100%) target, to give effect to the 2015 Paris Agreement. The CCC is due to present its report in May, and is likely to recommend the further tightening of carbon budgets, including for transport, both before and after 2030. Transport for the North has promised a Pathway to 2050 for carbon reduction and has committed to amend its programme of interventions to meet existing targets. All this could mean earlier and more challenging targets for reducing carbon emissions to meet with the Climate Change Act.

Question 71

Do you agree with the proposed policy on Freight and Logistics?

Mostly Agree

What is the reason for your answer?

It is good that the existing rail and water served sites for freight will be protected.

We are not convinced that siting more air freight on green fields in protected Green Belt is appropriate in planning policy terms when alternative brownfield sites exist nearby. It is simply not a good idea. The job density of warehousing is low and is set to be lower as technology replaces employment of people. The airport conveys more imports than exports and this has a negative impact on the local and national economy.

Question 72

Do you agree with the proposed policy on Streets For All?

Agree

What is the reason for your answer?

We applaud the integrated approach and hope it will have the desired impact of promoting pedestrians and cyclists, and the more vulnerable uses, at the expense of demoting motor vehicles. This is a sustainable policy. The more green infrastructure that can be incorporated in built areas, the better.

Bullet 11 should refer to 'Avoiding, reducing, then mitigating the impacts of air and noise pollution from motor-based road transport.'

Question 73

Do you have any further comments on the policies and overall approach proposed in A Connected Greater Manchester?

Whilst CPRE applauds the Greater Manchester Mayor's intention to create clean air zones and to place levies on buses, HGVs and older taxis and private hire vehicles, it cannot support the exemption of private cars from the levies. Greater Manchester's own research shows that 285,000 cars licensed by them breach air pollution limits. This issue impacts on health policies as well as transport policies.

CPRE hopes that the connectivity of Greater Manchester can be greatly improved through the integration of sustainable and public transport systems. The motor-based road vehicles must be better managed to create 'vehicle free zones' to tackle chronic air and noise pollution. The GMSF must seek to make the social, environmental and economic factors better and motor-based vehicles cause a great many harms. The negative impacts must be resolved, and a modal shift supported by improved technology underpins this.

Allocations

Question 74

Do you agree with the proposed policy GM Allocation 1: Northern Gateway?

Mostly disagree

What is the reason for your answer?

As mentioned in answers to questions 36-40, the expert economists commissioned by CPRE show that the employment need for B2 and B8 has been significantly overestimated. Development of such large scale premises at the Northern Gateway will undermine the market for commercial premises elsewhere in Greater Manchester, such as Trafford Park and Central Park.

More brownfield land is suitable for reuse for B2 and B8 employment elsewhere in the sub-region. More liaison is required with companies who are likely to vacate larger premises over the next 5 and 10 years to understand the contribution these windfall sites can make.

Exceptional circumstances do not exist to necessitate the Green Belt release at this location.

The harm to Green Belt purposes is substantial at the location with Bury and Rochdale effectively being merged, due to urban sprawl and countryside encroachment.

We consider the impacts from large scale induced road based transport to be contrary to other policies in the Strategic Framework concerning sustainable development, net carbon development and air quality.

Despite suggestion of improved transport for rail freight at GMA1 CPRE has concerns that this is not part of the early stages of Greater Manchester's Transport Strategy 2040. The reality is that much more motor based traffic will be induced by this proposed allocation, causing significant negative impacts for people living locally.

We observe that Lancashire Wildlife Trust has been unable to comment on this site due to no readily accessible data. Therefore we are concerned about habitats and species of principal.

Question 75

Do you agree with the proposed policy GM Allocation 1.1: Heywood / Pilsworth (Northern Gateway)?

Disagree

What is the reason for your answer?

See answer to question 74. In addition, the harm to Green Belt purposes is substantial at the location with Bury and Rochdale (Heywood / Pilsworth) effectively being merged, due to urban sprawl and countryside encroachment.

The benefits of the land as green fields protected by Green Belt designation should be balanced with the harms from loss of farmland, farm related businesses and loss of residential amenity.

The wholesale development in this location would induce unacceptable levels of road based transport particularly HGV vehicles. Harm to environmental quality such as Green House Gas emissions, noise, air quality and dark skies will occur.

We observe that Lancashire Wildlife Trust concern for ecology of Whittle and Brightley Brooks and the Site of Biological Importance adjacent to the allocation site.

Question 76

Do you agree with the proposed policy GM Allocation 1.2: Simister and Bowlee (Northern Gateway)?

Disagree

What is the reason for your answer?

See answer to question 74. In addition, the harm to Green Belt purposes is substantial at the location with Bury and Rochdale (Simister/Bowlee) effectively being merged, due to urban sprawl and countryside encroachment.

The benefits of the land as green fields protected by Green Belt designation should be balanced with the harms from loss of farmland, farm related businesses and loss of residential amenity.

The wholesale development in this location would induce unacceptable levels of road based transport particularly HGV vehicles. Harm to environmental quality such as Green House Gas emissions, noise, air quality and dark skies will occur.

We observe that Lancashire Wildlife Trust concern for Streams & Flushes near Bradley Hall Farm Sites of Biological Importance.'

Question 77

Do you agree with the proposed policy GM Allocation 1.3: Whitefield (Northern Gateway)?

Mostly disagree

What is the reason for your answer?

See answer to question 74.

In addition, the harm to Green Belt purposes is substantial at the location with Bury sprawling towards the M66 causing unnecessary countryside encroachment.

The benefits of the land as green fields protected by Green Belt designation should be balanced with the harms from loss of farmland, farm related businesses and loss of residential amenity.

The wholesale development in this location would induce unacceptable levels of road based transport particularly HGV vehicles. Harm to environmental quality such as Green House Gas emissions, noise, air quality and dark skies will occur.

Question 78

Do you agree with the proposed policy GM Allocation 2: Stakehill?

Mostly disagree

What is the reason for your answer?

The expert economists commissioned by CPRE show that the employment need for B2 and B8 has been significantly overestimated. Development of such large scale premises here will undermine the market for commercial premises elsewhere in Greater Manchester, such as Trafford Park and Central Park.

More brownfield land is suitable for reuse for B2 and B8 employment elsewhere in the sub-region. More liaison is required with companies who are likely to vacate larger premises over the next 5 and 10 years to understand the contribution these windfall sites can make.

Exceptional circumstances do not exist to necessitate the Green Belt release at this location.

The wholesale development in this location would induce unacceptable levels of road based transport particularly HGV vehicles. Harm to environmental quality such as Green House Gas emissions, noise, air quality and dark skies will occur.

Locally this development is very unpopular and there have been a number of walks up Tandle Hill to emphasise the local objection.

CPRE also prefers to see this land stay as greenfield, however, if the allocation remains, CPRE would support the inclusion of bullet point "5. Retain a strategic area of Green Belt between the A627(M) spur and Thornham Lane to maintain separation between the urban areas of Rochdale and Middleton;"

Question 79

Do you agree with the proposed policy GM Allocation 3: Kingsway South?

Mostly disagree

What is the reason for your answer?

When consulting with local people CPRE were reminded that the Kingsway Business Park in proximity to the M62 junction 21 which was first opened a decade ago and is still half vacant. This supports the view of the expert economists that the employment need for B2 and B8 has been significantly overestimated. More brownfield land is suitable for reuse for B2 and B8 employment elsewhere in the sub-region. Exceptional circumstances do not exist to necessitate the Green Belt release at this location.

The wholesale development in this location would induce unacceptable levels of road based transport particularly HGV vehicles. Harm to environmental quality such as Green House Gas emissions, noise, air quality and dark skies will occur.

CPRE also prefers to see this land stay as greenfield, however, if the allocation remains, CPRE would support the inclusion of bullet point “4. Retain a strategic area of Green Belt in the eastern half of the site to maintain separation between the urban areas of Newhey and Shaw.” We support bullet 11 concerning the green infrastructure and high level of landscaping. In addition it is important that biodiversity, such as Meadow north of Moss Gate Site of Biological Importance is protected and enhanced.

Question 80

Do you agree with the proposed policy GM Allocation 4: Bewshill Farm?

Mostly disagree

What is the reason for your answer?

The amount of B2 and B8 floorspace identified as required by the Revised Draft GMSF is excessive. We think there are alternative brownfield sites nearby.

This site involves the loss of grade 3 farmland, currently protected by Green Belt. CPRE wants farmland to be protected for future generations’ food security.

The GMSF should protect Cutacre Brook Site of Biological Importance and the residing amphibian populations to the south of the proposed allocation.

Question 81

Do you agree with the proposed policy GM Allocation 5: Chequerbent North?

Disagree

What is the reason for your answer?

The amount of B2 and B8 floorspace identified as required by the Revised Draft GMSF is excessive. We think there are alternative brownfield sites nearby.

This site involves the loss of grade 3 farmland, currently protected by Green Belt. CPRE wants farmland to be protected for future generations food security.

Previous development applications have been refused, but developer interests just will not take ‘No’ for an answer. It is very important that the GMSF should not become a vehicle for overturning local decision making, and that local councillors are able to exercise their democratic roles. This issue raises the important role of democracy in the GMSF process.

CPRE recommends this site should be maintained as Green Belt land due to the important purpose it serves.

Question 82

Do you agree with the proposed policy GM Allocation 6: West of Wingates / M61 Junction 6?

Disagree

What is the reason for your answer?

The amount of B2 and B8 floorspace identified as required by the Revised Draft GMSF is excessive. We think there are alternative brownfield sites nearby.

This site involves the loss of farmland, currently protected by Green Belt. CPRE wants farmland to be protected for future generations food security.

CPRE recommends this site should be maintained as Green Belt land due to the important purpose it serves.

The Lancashire Wildlife Trust has identified issues with the incorporation of a Local Wildlife Site (SBI) and required mitigation. Significant development at this site would put significant access and disturbance pressures onto Borsdane Wood Local Wildlife Site (SBI) and adequate mitigation should be made clear in the policy or supporting text.

Question 83

Do you have any further comments on the overall proposals for Bolton, including the strategic transport interventions?

Bolton has some lovely areas of countryside that should be protected and enhanced as the GMSF is progressed.

The electrification of the Manchester to Preston line is welcomed as this will make Bolton Town Centre more accessible to more people. There are no business cases for Bolton identified on Map 2 of the Greater Manchester Transport Strategy. The electrification of the Bolton to Wigan line would be welcomed as this will make Bolton Town Centre even more accessible to more people, but CPRE recommends the timescale is shortened to deliver the benefits as soon as possible.

Question 84

Do you agree with the proposed policy GM Allocation 7: Elton Reservoir?

Disagree

What is the reason for your answer?

We think the amount of housing identified is too high, and more could be accommodated on existing brownfield sites elsewhere.

The majority of land within this area is currently in agricultural use, and it is protected by Green Belt.

The water features of Elton and Withins Reservoirs have ecological value, especially bird life, which must be protected and enhanced. The Lancashire Wildlife Trust has identified

that all of the site is within the Green Infrastructure Network and almost 20% is within a Wildlife Corridor and a significant amount is within Local Wildlife Sites and includes a Priority Habitat. CPRE doubts that the ecological harm can be justified.

There are serious concerns whether a proposed Metrolink stop alone would enable residents of the 3,500 dwellings to access jobs and other services such as school and training without relying on car journeys. The areas road network is already over capacity.

This green area is an important 'green lung' and has some public footpath access and there is further potential for more recreation and nature conservation opportunities if left undeveloped.

This site should not be included in the GMSF.

Question 85

Do you agree with the proposed policy GM Allocation 8: Seedfield?

Agree

What is the reason for your answer?

This is a small infill site, on a part brownfield site. It will deliver 140 homes in easy reach of Bury Town Centre.

Question 86

Do you agree with the proposed policy GM Allocation 9:Walshaw?

Mostly disagree

What is the reason for your answer?

Although the grade of farmland is low, the site is within protected Green Belt with the aim of keeping the land permanently open. CPRE thinks it should remain unbuilt due to the local benefits afforded, such as residential amenity and health and well-being associated with exercise in natural environments.

Question 87

Do you have any further comments on the overall proposals for Bury, including the strategic transport interventions?

Bury has some lovely areas of countryside that should be protected and enhanced as the GMSF is progressed. The Green Belt of Bury is disproportionately impacted by the site allocations including those that cross the border with Rochdale.

The Greater Manchester Transport Strategy 2040 identifies on Map one Metrolink improvements on the Bury to Altrincham line related to capacity. Map 2 indicates multi-modal improvements, including Quality Bus Transit between Bolton-Bury-Rochdale

Question 88

Do you agree with the proposed policy GM Allocation 10: Global Logistics?

Disagree

What is the reason for your answer?

CPRE has provided opinion of expert economists that too much employment space has been identified, and that focusing employment growth at the Airport will suck economic activity out of existing city centres and town centres.

The allocation would undoubtedly negatively impact on Cotterill Clough SSSI, and other nearby Sites of Biological Importance and ancient woodland, which would be difficult to properly mitigate.

The site is already an existing allocation and due to the Enterprise Zone designation, CPRE realises that there is significant policy pressure on the site and it is not covered by Green Belt policy protection.

Question 89

Do you agree with the proposed policy GM Allocation 11: Roundthorn Medipark Extension?

Mostly disagree

What is the reason for your answer?

Too much B1 office space has been estimated as required, as shown by the expert economists commissioned by CPRE. Office development should be focused at existing city and town centres and not at the Airport due to the harm this may have on displacing existing office uses.

This is a Green Belt protected site on the border of Manchester and Trafford, which maintains the area permanently open and stops the two distinct places merging together.

Question 90

Do you agree with the proposed policy GM Allocation 12: Southwick Park?

Mostly disagree

What is the reason for your answer?

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.

CPRE is not convinced of the merits of this site.

Question 91

Do you have any further comments on the overall proposals for Manchester, including the strategic transport interventions?

Manchester has significant amounts of brownfield land, particularly large sites. Manchester has little Green Belt land, and we consider that there is no real exceptional circumstance to release Green Belt land. The GMSF could and should do more to tackle the blight associated with vacant and neglected sites, through targeted action to unlock the potential of previously used sites in advance of using green fields for delivering new jobs and homes. Everything should be done to support Manchester as the strategic centre for employment, along with Salford as the centre of the urban conurbation. Any proposal to allow the Airport to rival Manchester and Salford City Centres should be challenged vigorously.

Manchester is very well served by public transport infrastructure.

Question 92

Do you agree with the proposed policy GM Allocation 13: Ashton Road Corridor?

Mostly disagree

What is the reason for your answer?

The exceptional circumstances required to release Green Belt have not been properly established as the jobs and housing figures have been over-estimated. CPRE objects to the needless release of Green Belt designated land for development.

The function of the sites in terms of fulfilling Green Belt purposes needs to be fully considered.

Question 93

Do you agree with the proposed policy GM Allocation 14: Beal Valley?

Mostly disagree

What is the reason for your answer?

We note the site is designated as Other Protected Open Land (OPOL) in the Oldham Development Plan Document - Joint Core Strategy and Development Management Policies, however, we understand the land has local benefits in staying unbuilt. Locally there are concerns that area around the Beal Valley should be maintained as it currently exists, and the DPD Vision sets out that the landscape character of the Beal Defined Valleys should be protected, conserved and enhanced.

Lancashire Wildlife Trust has expressed concern about the harm to the Local Wildlife Site (SBI) G14:Shawside and extant Green Infrastructure. CPRE echoes these concerns and recommends the impacts on the ground-nesting breeding wading bird populations within the SBI and their dependence on sufficient areas of open land are fully considered. We do note that a large part of the site is to remain as Green Belt for this purpose, but nevertheless agree that retaining just the SBI would be insufficient to retain and protect these species populations, much less increase numbers and distribution to achieve net biodiversity gain: consequently, the policy must specify that Green Infrastructure

retention and enhancement must be designed around the requirements of these important species populations.

Question 94

Do you agree with the proposed policy GM Allocation 15: Broadbent Moss?

Disagree

What is the reason for your answer?

We note the site is designated as Other Protected Open Land (OPOL) in the Oldham Development Plan Document - Joint Core Strategy and Development Management Policies, however, we understand the land has local benefits in staying unbuilt.

Question 95

Do you agree with the proposed policy GM Allocation 16: Cowlshaw

Mostly disagree

What is the reason for your answer?

We note the site is designated as Other Protected Open Land (OPOL) in the Oldham Development Plan Document - Joint Core Strategy and Development Management Policies, however, we understand the land has local benefits in staying unbuilt.

Question 96

Do you agree with the proposed policy GM Allocation 17: Hanging Chadder?

Disagree

What is the reason for your answer?

We note the site is designated as Other Protected Open Land (OPOL) in the Oldham Development Plan Document - Joint Core Strategy and Development Management Policies, however, we understand the land has local benefits in staying unbuilt.

The protection and enhancement of the Royton Moss Site of Biological Importance must be properly considered. Although an area of degraded lowland raised bog ("mossland"), there are important species of Sphagnum moss and birds associated with marshy grassland, such as Reed Bunting and Grasshopper Warbler. The hydrology of the Royton Moss Local Wildlife Site must be protected.

The natural capital value, specifically of its habitats & species of principal importance and its ecological networks is of great concern.

Question 97

Do you agree with the proposed policy GM Allocation 18: Robert Fletchers?

Disagree

What is the reason for your answer?

We echo concerns raised by Friends of the Peak District as it represents a substantial intensification of development on the site, which would be problematic for the beautiful gateway to Dovestone and it is assessed as having probable harm to the Peak District National Park setting.

We support the regeneration of the brownfield land which is the mill complex but this must be appropriate to, and done in such a way that it enhances the setting and experience of, the National Park. We view this countryside encroachment as unacceptable due to the harm to the rural landscape which benefits from the highest planning policy protection of Green Belt in the context of views in and out of the Peak District National Park, and proximity to the Dovestones Reservoir means it is not a suitable site for allocation.

CPRE can see some benefit in having an educational centre linking Dovestones Reservoir with the RSPB and United Utilities, but we would urge this to be within the curtilage of the previously developed footprint.

Question 98

Do you agree with the proposed policy GM Allocation 19: South of Rosary Road?

Neither agree or disagree

What is the reason for your answer?

The site is in Green Belt and we do not accept exceptional circumstances have been fully justified due to the excessive jobs and housing growth assumed.

There are ecological issues to be fully taken account of when deciding on whether to allocate the site, and the residential amenity.

The area of Fitton Hill was previously in receipt of regeneration funding as part of New Deal for Communities and Housing Market Pathfinder. The area may need additional new quality housing to support earlier investment.

Question 99

Do you agree with the proposed policy GM Allocation 20: Spinners Way/Alderney Farm?

Mostly disagree

What is the reason for your answer?

The site is in Green Belt and we do not accept exceptional circumstances have been fully justified due to the excessive jobs and housing growth assumed.

The site does have a level of ecological value.

Question 100

Do you agree with the proposed policy GM Allocation 21:Thornham Old Road?

Mostly disagree

What is the reason for your answer?

The site is in Green Belt and we do not accept exceptional circumstances have been fully justified due to the excessive jobs and housing growth assumed.

The site does have a level of ecological value. The Lancashire Wildlife Trust has identified nesting Skylark and resident Badger in this allocation site; and the relatively recent disappearance of Brown Hare.

There are important visual impacts on the views from Tandle Hill Country Park and the local network of Public Rights of Way.

We note the “Streets for All” programme and support the principle of a modal shift, particularly to public transport and walking and cycling to improve air quality and the regeneration of local centres.

Question 101

Do you agree with the proposed policy GM Allocation 22:Woodhouses?

Mostly disagree

What is the reason for your answer?

The site is in Green Belt and we do not accept exceptional circumstances have been fully justified due to the excessive jobs and housing growth assumed.

There are heritage landscape impacts to fully consider relating to Woodhouses Conservation Areas.

There are ecological issues relating to the Sites of Biological Interest at Brookdale Golf Course and Lord’s Brook Flushes.

Question 102

Do you have any further comments on the overall proposals for Oldham, including the strategic transport interventions?

Question 103

Do you agree with the proposed policy GM Allocation 23: Bamford/Norden?

Mostly disagree

What is the reason for your answer?

The site is in Green Belt and we do not accept exceptional circumstances have been fully justified due to the excessive jobs and housing growth assumed.

There are brownfield sites that have not been recorded on the Brownfield Register. More work is needed on this.

The Ashworth Valley provides an important recreational route with landscape value. This asset should be protected and enhanced.

Question 104

Do you agree with the proposed policy GM Allocation 24: Castleton Sidings?

Mostly agree

What is the reason for your answer?

The area of the site that has been previously developed should be allocated for a future employment or housing use.

CPRE believes there are not exceptional circumstances to release Green Belt land due to excessive jobs and housing growth forecasts being applied to the development requirements. Also more brownfield land exists than is recorded on the registers.

Question 105

Do you agree with the proposed policy GM Allocation 25: Crimble Mill?

Mostly disagree

What is the reason for your answer?

CPRE believes there are not exceptional circumstances to release Green Belt land due to excessive jobs and housing growth forecasts being applied to the development requirements. Also more brownfield land exists than is recorded on the registers.

We would welcome investment to protect the heritage value associated with the Grade II* Listed Crimble Mill.

Question 106

Do you agree with the proposed policy GM Allocation 26: Land North of Smithy Bridge?

Mostly disagree

What is the reason for your answer?

This is an important Pennine Fringe setting, consequently the benefits of the rural landscape character forming the setting of Hollingworth Lake and Rochdale Canal must be properly considered.

CPRE believes there are not exceptional circumstances to release Green Belt land due to excessive jobs and housing growth forecasts being applied to the development requirements. Also more brownfield land exists than is recorded on the registers.

Question 107

Do you agree with the proposed policy GM Allocation 27: Newhey Quarry?

Mostly disagree

What is the reason for your answer?

CPRE believes there are not exceptional circumstances to release Green Belt land due to excessive jobs and housing growth forecasts being applied to the development requirements. Also more brownfield land exists than is recorded on the registers.

Although the quarry has not been used for a number of years it retains a permission for mineral extraction.

Lancashire Wildlife Trust has highlighted the harm from the loss of Green Belt through this allocation potentially reduces land available for green infrastructure and for maintenance, restoration and creation of functional ecological networks. This natural capital loss is not mentioned in the policy and this should be rectified.

Question 108

Do you agree with the proposed policy GM Allocation 28: Roch Valley?

Mostly disagree

What is the reason for your answer?

Although this site is not Green Belt, it is designated as Protected Open Land. There are visual impacts to the long distance views that would detract from the local landscape setting.

Question 109

Do you agree with the proposed policy GM Allocation 29:Trows Farm?

Mostly disagree

What is the reason for your answer?

This site is used by Trows Farm as a horse-riding businesses and associated horse grazing. Local people have contacted CPRE to discuss the impact of jobs being lost from such activity if the land is allocated for housing development. The horse riding centre is viewed as an important local facility providing recreation to many local people.

Question 110

Do you have any further comments on the overall proposals for Rochdale, including the strategic transport interventions?

Rochdale has significant amounts of brownfield land associated with former industrial use that should be used in advance of Green Belt land.

The estimates for jobs and housing are too high and must be reduced downwards to reflect realism.

CPRE does support the intention of GMCA to balance the economy of Rochdale with elsewhere in Greater Manchester.

Question 111

Do you agree with the proposed policy GM Allocation 30: Land at Hazelhurst Farm?

Mostly disagree

What is the reason for your answer?

CPRE believes there are not exceptional circumstances to release Green Belt land due to excessive jobs and housing growth forecasts being applied to the development requirements. Green Belt is not mentioned in the text for this policy and it should have been.

Lancashire Wildlife Trust identified the presence of a population of breeding Willow Tit, a UK Red Alert species, by requiring measures to deliver the protection and expansion of the local population as part of a strategic approach to population recovery across Greater Manchester. CPRE echoes these concerns and recommendations.

In Salford there are more brownfield sites that exist than are recorded on the registers.

It is right that the urban areas should be the focus for the delivery of new jobs and homes.

CPRE does support the 50% of affordable housing allocation to ensure more economically disadvantaged households have access to affordable properties in the area.

Question 112

Do you agree with the proposed policy GM Allocation 31: East of Boothstown?

Mostly disagree

What is the reason for your answer?

CPRE believes there are not exceptional circumstances to release Green Belt land due to excessive jobs and housing growth forecasts being applied to the development requirements. Green Belt is not mentioned in the text for this policy and it should have been.

The policy refers to Water Vole and bird surveys and complementary habitats in Chat Moss to the south. But, as the allocation also lies adjacent to two Local Wildlife Sites (Botany Bay Wood SBI Middle Wood SBI), these should be referred to in the introductory text and requirements added to safeguard the special wildlife features of both.

The Lancashire Wildlife Trust identified the presence of a population of breeding Willow Tit, a UK Red Alert species, by requiring measures to deliver the protection and expansion of the local population as part of a strategic approach to population recovery across Greater Manchester. Also, South Lancashire Bat Group has observed a substantial population of Daubenton's Bat associated with this area. Similar considerations apply as to those outlined for Willow Tit. Furthermore, a regionally significant population of ground-nesting wading birds, for which records have been submitted to the Greater Manchester Local (Biological) Records Centre. CPRE echoes these concerns and recommendations.

The pursuit of development at the site by developer interests should not out-weigh significant ecological concerns.

In Salford there are more brownfield sites that exist than are recorded on the registers.

It is right that the urban areas should be the focus for the delivery of new jobs and homes.

CPRE does support the 50% of affordable housing allocation to ensure more economically disadvantaged households have access to affordable properties in the area.

Question 113

Do you agree with the proposed policy GM Allocation 32: North of Irlam Station?

Disagree

What is the reason for your answer?

Green Belt is not mentioned in the text for this policy and it should have been. The site is in designated Green Belt land, and due to excessive jobs and houses being identified based on poor assumptions and analysis, we believe exceptional circumstances simply do not exist.

There are alternative suitable brownfield sites elsewhere to deliver the jobs and housing actually needed.

This site is of highest grade agricultural (Grade 1) land. It is a national asset and should not be built. It should be maintained as agricultural land for the benefit of future generations.

There are hydrology issues relating to Chat Moss and the Greater Manchester Wetlands Nature Improvement Area.

This site is also important as an area of Priority Habitats. It is home to many rare birds including many red and amber listed species as well as mature trees, established hedgerows and a network of public footpaths. This area is well used for walking, bird watching, bike rides.

The Lancashire Wildlife Trust is of opinion, this policy, as worded, is very likely to lead to further attrition of the already severely degraded hydrology and carbon storage capacity of the Great. This should not be allowed to happen.

Question 114

Do you agree with the proposed policy GM Allocation 33: Port Salford Extension?

Mostly disagree

What is the reason for your answer?

CPRE supports the principle of Port Salford in providing an integrated tri-modal facility on the ship canal, with excellent rail and road links, enabling the whole of Greater Manchester to benefit from easy port access. However, the site is of highest grade

agricultural (Grade 1) land. It is a national asset and should not be built. It should be maintained as agricultural land for the benefit of future generations.

Furthermore, we highlight that the Green Belt at this location does provide an important 'green lung' function at this location and that additional road based haulage in an area that already has poor air quality and noise performance is not sustainable.

In particular we are concerned that the Port users may in reality not rely equally on road, water and rail based modes of transport. We would like to see GMCA provide some policy support for equal shares of water and rail based transport, and limit the volume of HGV movements. There should be strict control applied to ensure this reality is a tri-modal development, and not a cover for more road transport in an already heavily congested road space.

We are genuinely concerned that the capacity of the environment is at its limit, and on the adverse impact on the health and well-being of nearby residents. It should only be encouraged for genuine Port and Manchester Ship Canal related development. We are supportive of a potential new station here to enable more sustainable travel to the area.

Question 115

Do you have any further comments on the overall proposals for Salford, including the strategic transport interventions?

Salford has significant amounts of brownfield land, particularly large sites. In Salford there is no real exceptional circumstance to release Green Belt land. The GMSF could and should do more to tackle the blight associated with vacant and neglected sites, through targeted action to unlock the potential of previously used sites in advance of using green fields for delivering new jobs and homes. Everything should be done to support Salford and Manchester as the strategic centres for employment.

Question 116

Do you agree with the proposed policy GM Allocation 34: Bredbury Park Extension?

Disagree

What is the reason for your answer?

The economic experts have identified that employment need for B2 and B8 has been significantly overestimated. More brownfield land is suitable for reuse for B2 and B8 employment elsewhere in the sub-region. Therefore, we make the case that exceptional circumstances do not exist to necessitate the Green Belt release at this location.

CPRE is strongly opposed to the development of this Green Belt site due to the detrimental impact on the Green Belt causing the merging of the distinct areas of Tameside and Stockport.

The Landscape Character of the Tame Valley and Brinnington East must be protected and enhanced

Question 117

Do you agree with the proposed policy GM Allocation 35: Former Offerton High School?

Mostly disagree

What is the reason for your answer?

CPRE objects to the site being released from Green Belt. Exceptional circumstances to release Green Belt do not exist. The jobs and housing requirements are based on invalid assumptions, and therefore the scale of development required is lower.

CPRE believes there are more suitable brownfield sites available locally than identified on the brownfield register.

Question 118

Do you agree with the proposed policy GM Allocation 36: Gravel Bank Road/Unity Mill?

Mostly disagree

What is the reason for your answer?

CPRE is most supportive of Unity Mill being refurbished for apartments and the area surrounding the site assessed as previously developed. But, we object to the part of the site that is unbuilt being released from Green Belt.

Exceptional circumstances to release Green Belt do not exist. The jobs and housing requirements are based on invalid assumptions, and therefore the scale of development required is lower.

CPRE believes there are more suitable brownfield sites available locally than identified on the brownfield register.

The site is located within the Tame Valley and Brinnington East Landscape Character Area, creating a strong north-south rural gateway into Stockport Town Centre, and this ought to be protected and enhanced in the future.

Question 119

Do you agree with the proposed policy GM Allocation 37: Heald Green?

Disagree

What is the reason for your answer?

Exceptional circumstances to release Green Belt do not exist. The jobs and housing requirements are based on invalid assumptions, and therefore the scale of development required is lower.

CPRE believes there are more suitable brownfield sites available locally than identified on the brownfield register.

The site is located within the Heald Green Fringe Landscape Character Area, which must be protected and enhanced in the future.

There are views to and from the Peak District National Park and countryside of Cheshire East that are of visual amenity value and these ought to be protected in the future. The area's special landscape qualities, in line with GM-G 1 'Valuing Important Landscapes', should be protected.

We support a "Net Enhancement of Biodiversity and Geodiversity", but fail to see how this can be achieved if the site is allocated for development.

Question 120

Do you agree with the proposed policy GM Allocation 38: High Lane?

Disagree

What is the reason for your answer?

Exceptional circumstances to release Green Belt do not exist. The jobs and housing requirements are based on invalid assumptions, and therefore the scale of development required is lower.

CPRE believes there are more suitable brownfield sites available locally than identified on the brownfield register.

CPRE supports the reduction in housing development from 2,000 homes at the draft GMSF stage to a more modest 500 homes for the site, and it is welcomed that a minimum of 30% is to be affordable. There are still adverse traffic impacts to the Peak District National Park, albeit reduced. Public transport services need to be improved.

The site is within the Ladybrook Valley and Hazel Grove High Lane Landscape Character Areas, which must be protected and enhanced in the future.

The area's special landscape qualities, in line with GM-G 1 'Valuing Important Landscapes', should be protected.

We support a "Net Enhancement of Biodiversity and Geodiversity", but fail to see how this can be achieved if the site is allocated for development.

Question 121

Do you agree with the proposed policy GM Allocation 39: Hyde Bank Meadows?

Mostly disagree

What is the reason for your answer?

Exceptional circumstances to release Green Belt do not exist. The jobs and housing requirements are based on invalid assumptions, and therefore the scale of development required is lower.

CPRE believes there are more suitable brownfield sites available locally than identified on the brownfield register.

This site provides considerable local amenity as a football pitch and outdoor gym and is locally opposed. There is a Tangshutt Trail, funded by the Big Lottery Fund incorporating a community orchard, meadow, a safe route to school, and a wooded valley. CPRE believes the community value of the land as it exists is greater than that proposed by delivering houses.

The site is located within the Goyt Valley Landscape Character Area and this should be protected.

This is not a good site for inclusion in the GMSF and should be deleted.

Question 122

Do you agree with the proposed policy GM Allocation 40: Stanley Green?

Mostly disagree

What is the reason for your answer?

Exceptional circumstances to release Green Belt do not exist. The jobs and housing requirements are based on invalid assumptions, and therefore the scale of development required is lower.

CPRE believes there are more suitable brownfield sites available locally than identified on the brownfield register.

Question 123

Do you agree with the proposed policy GM Allocation 41: Woodford Aerodrome?

Mostly agree

What is the reason for your answer?

Previously 2,400 houses had been proposed at this brownfield site in Green Belt, which was too excessive. Although the site is brownfield and CPRE campaigns for a brownfield first approach, much of the site was in fact greenfield and we would have preferred to see the greenfield areas free from housing development. However, we acknowledge that a reduction of two thirds to 750 houses, a minimum of 40% affordable, with a clear phasing strategy is a much better outcome for the local area. There will as a consequence of this revision be a much more suitable housing development that leads to much less harm.

There are important views in and outside of the Peak District National Park that need to be afforded protection.

Question 124

Do you have any further comments on the overall proposals for Stockport, including the strategic transport interventions?

Stockport does not have the exceptional circumstances to release Green Belt do not exist. The jobs and housing requirements are based on invalid assumptions, and therefore the scale of development required is lower. CPRE believes there are more suitable brownfield sites available locally than identified on the brownfield register.

There are important views in and outside of the Peak District National Park that need to be afforded protection.

Question 125

Do you agree with the proposed policy GM Allocation 42: Ashton Moss West?

Mostly disagree

What is the reason for your answer?

Exceptional circumstances to release Green Belt do not exist. The jobs and housing requirements are based on invalid assumptions, and therefore the scale of development required is lower.

CPRE believes there are more suitable brownfield sites available locally than identified on the brownfield register.

The site is of high grade agricultural (Grade 2) land. It is a national asset and should not be built. It should be maintained as agricultural land for the benefit of future generations.

The site has Air Quality Management Areas to the south and west due to the M60 motorway and A6140, and therefore the site performs an important 'green lung' function.

Question 126

Do you agree with the proposed policy GM Allocation 43: Godley Green Garden Village?

Mostly disagree

What is the reason for your answer?

Exceptional circumstances to release Green Belt do not exist. The jobs and housing requirements are based on invalid assumptions, and therefore the scale of development required is lower.

CPRE believes there are more suitable brownfield sites available locally than identified on the brownfield register.

Question 127

Do you agree with the proposed policy GM Allocation 44: South of Hyde?

Mostly disagree

What is the reason for your answer?

Exceptional circumstances to release Green Belt do not exist. The jobs and housing requirements are based on invalid assumptions, and therefore the scale of development required is lower.

CPRE believes there are more suitable brownfield sites available locally than identified on the brownfield register.

Question 128

Do you have any further comments on the overall proposals for Tameside, including the strategic transport interventions?

In Tameside there are no exceptional circumstances to release Green Belt. The jobs and housing requirements are based on invalid assumptions, and therefore the scale of development required is lower.

CPRE believes there are more suitable brownfield sites available locally than identified on the brownfield register.

Tameside has some lovely rural places and these should be retained for the economic, social and environmental benefits they bring. We hope the GMSF will protect and enhance Tameside's countryside for the benefit of future generations.

Question 129

Do you agree with the proposed policy GM Allocation 45: Carrington?

Mostly agree

What is the reason for your answer?

See our answer to question 24. CPRE supports the reuse of previously developed land therefore is pleased to see the extensive former Shell Carrington industrial estate. However, we do object to Green Belt land release at the location.

The area around the brownfield site is noted for its ecology as a (UK Biodiversity Action Plan) priority habitat, which is currently designated as Green Belt.

Consequently, CPRE recommends that a much smaller site should be allocated and we advocate the use of a masterplan or Supplementary Planning Document (SPD) that has been approved by the local authority should be required and that the affordable housing contribution should be in excess of 30%.

Due to the poor current public transport links, we think it is vital that this should be provided upfront, so that sustainable behaviours of new communities are encouraged as soon as possible.

Question 130

Do you agree with the proposed policy GM Allocation 46: Timperley Wedge?

Disagree

What is the reason for your answer?

CPRE is concerned at the scale of employment expansion at Manchester Airport and the impacts on the rest of the conurbation. CPRE believes the airport does have an important role in the sub-region, but it should not become the focus for development better suited to city centre and town centre locations as it will suck vitality out of our existing local economic centres. It will also put pressure for sprawl on East Cheshire and divert investment away from northern areas, which are supposed to benefit most from the Greater Manchester Spatial Framework policies and allocations.

We therefore, believe the Timperley Wedge should be retained as a high quality rural setting and that the 60,000 sq.m office and 2,400 housing development at Davenport Green should not go ahead.

Currently the area is not well served by local public services, although we note a tram extension is in Greater Manchester Transport Strategy 2040 Map 2 illustrating the next five year business cases.

Davenport Green is a very valuable green lung in an increasingly over-developed area which has ever-decreasing air quality. The issue of air quality particularly around the airport must be addressed.

As the policy says in bullet point 20., Fairywell Brook and Timperley Brook must be protected and enhanced to improve the existing water quality and seek to achieve 'good' status as proposed under the EU Water Framework Directive.

Question 131

Do you have any further comments on the overall proposals for Trafford, including the strategic transport interventions?

Question 132

Do you agree with the proposed policy GM Allocation 47: Land South of Pennington?

Disagree

What is the reason for your answer?

We retain our strong objection to the release of this site as it fulfils a primary green belt objective by preventing urban sprawl between Leigh and Lowton. The remaining 'green strip' adjacent to the Atherleigh Way (A579) is not adequate in scale to form a defensible parcel of Green Belt providing open views extending in all directions. Development of this land would amount to urban sprawl and encroachment into open countryside.

Question 133

Do you agree with the proposed policy GM Allocation 48: M6, Junction 25?

Disagree

What is the reason for your answer?

CPRE is strongly opposed to the development of land in this location as it would incur the loss of Green Belt designated land currently used for agriculture. The area is well used by local people for recreation with a network of accessible public rights of way.

The reallocation of this land was rejected by the local plan examiner in 2013. The examination report highlighted Green Belt issues and the adverse impact of urban sprawl, the amount of available local brownfield sites and therefore the lack of exceptional circumstance. The absence of a two-way access was also highlighted.

Wigan has one of the largest amounts of brownfield land in the country and it is part of the Government's Brownfield Pilot Register. There isn't an exceptional circumstance in Wigan to justify Green Belt release. Brownfield land must be fully considered in advance of Green Belt land loss.

As previously mentioned, CPRE is concerned that there is a serious and significant cumulative impact of a number of employment sites along the motorway network including St Helens (Florida Farm, M6 Junction 23), Chorley, Bolton and also by speculative developers jumping on the logistics bandwagon.

Question 134

Do you agree with the proposed policy GM Allocation 49: North of Mosley Common?

Mostly disagree

What is the reason for your answer?

Exceptional circumstances to release Green Belt in Wigan do not exist. The jobs and housing requirements are based on invalid assumptions, and therefore the scale of development required is lower.

CPRE believes there are more suitable brownfield sites available locally than identified on the brownfield register.

There is a brownfield site identified on the brownfield register to the south west of the site and CPRE queries why this has not been included within the site allocation. It seems incorporating brownfield land is not a preference. CPRE and the GMCA in Section 2 of the revised draft GMSF both say it should be. This is a missed opportunity.

Question 135

Do you agree with the proposed policy GM Allocation 50: Pocket Nook?

Disagree

What is the reason for your answer?

The expert economists show that too much employment space is being planned. Wigan also has significant brownfield land reserves that have not been fully included in the GMSF process.

Exceptional circumstances are not justified for Green Belt release.

The road infrastructure in Lowton is already struggling and such as scale of HGV movements from a development of this scale would cause considerable congestion.

There is a known flood risk at Carr Brook. We note GMSF acknowledge the two areas close to Carr Brook in the north of Pocket Nook are priority zones for groundwater protection, and therefore appropriate measures and restrictions will need to be in place should the site be allowed for development

For these reasons this is not a suitable site to be released from Green Belt.

Question 136

Do you agree with the proposed policy GM Allocation 51: West of Gibfield?

Mostly disagree

What is the reason for your answer?

The expert economists show that too much employment space is being planned. Wigan also has significant brownfield land reserves that have not been fully included in the GMSF process.

Exceptional circumstances are not justified for Green Belt release.

Question 137

Do you have any further comments on the overall proposals for Wigan, including the strategic transport interventions?

Wigan has significant amounts of brownfield land, particularly large sites. In Wigan there is no real exceptional circumstance to release Green Belt land. The GMSF could and should do more to tackle the blight associated with vacant and neglected sites, through targeted action to unlock the potential of previously used sites in advance of using green fields for delivering new jobs and homes.

Question 138

Do you have any further comments on the proposed allocations?

Yes, CPRE retains its strong objection to all sites incurring Green Belt loss. We demonstrate that exceptional circumstances do not exist to necessitate the Green Belt release.

The expert economists commissioned by CPRE show that the employment need for B2 and B8 has been significantly overestimated. This has the impact of falsely pushing upward the housing numbers.

Naturally, CPRE supports enough “needed” new jobs and houses being delivered. But GMCA should not accept the “demand” from developers for consent on the basis of their own profit as a valid reason to release Green Belt by over planning for jobs and housing.

Despite the GMSF’s stated brownfield preference, there are not enough brownfield site allocations. The Revised Draft GMSF fails to get to grips with opportunities for land

assembly. We believe there is much more brownfield land that is suitable for reuse for B2 and B8 employment across the sub-region.

CPRE therefore recommends more communication between the GMCA (or constituent local authorities) with large and medium companies, who are likely to vacate larger premises over the next 5 and 10 years to is necessary to better understand the contribution these windfall sites can make.

CPRE wants more effort to go into identifying all suitable brownfield sites to minimise the need for Green Belt release. To support this action we created a Brownfield Land Register Toolkit to better enable communities to identify sites to their local planning authority's planners. During the consultation period for the Revised Draft GMSF, we met with a number of local groups to identify brownfield sites that are 'missing' from the brownfield registers. We will supply these to the GMCA and respective constituent authorities in due course and provide an example in Appendix 3. We will continue to work with communities to provide completed toolkits to their respective local planning authority.

Development of employment premises in rural locations along the motorway network and around Manchester Airport will serve to undermine the market for commercial premises elsewhere in Greater Manchester, such as Trafford Park and Central Park. We consider the impacts from large scale induced road based transport to be contrary to other policies in the Strategic Framework concerning sustainable development, net carbon development and air quality. The harm to Green Belt purposes is substantial at the M60 locations with distinct settlements being wrongly merged, promoting unacceptable urban sprawl and countryside encroachment.

A brownfield preference should be pursued in accordance with the Revised Draft GMSF introduction text (paragraphs 1.16 and 1.17) to make the best use of available land, and to better protect our beloved countryside. The role of the countryside in supporting employment across Greater Manchester should be valued. Agriculture, forestry, food and drink sectors and tourism all rely on our rural places, and therefore greenfield land ought not be easily sacrificed for development

Question 139

Do you agree with the proposed policy on Infrastructure Implementation?

Agree

What is the reason for your answer?

CPRE agrees that it is important that the GMSF is supported by sources of funding and delivery mechanisms that are both timely and appropriate.

Policy GM-D1 should ensure community consultation and genuine engagement is at the heart of infrastructure planning, as it is the community that is best placed to identify deficiencies and prioritise investment. CPRE advocates neighbourhood planning to help identify funding priorities for Community Infrastructure Levy and other developer contributions.

Developers must not be allowed to renege on their contributions when agreed as it erodes public trust in the planning system.

Question 140

Do you agree with the proposed policy on Developer Contributions?

Agree

What is the reason for your answer?

Developers must deliver a sustainable Greater Manchester. Developers should share a reasonable proportion of the value of developing land with the people of Greater Manchester. Until recently viability assessments have been a secret, and this lack of transparency has eroded public trust in the planning system. Community accountability is an important part of identifying an acceptable level of developer contributions.

Greater Manchester Spatial Framework Economic Overview

Dr Zoe Appleton and Peter Milway
12th March 2019

Note on the Authors:

Dr Zoe Appleton

Dr Zoe Appleton holds a PhD in economic regeneration from the University of Sheffield and Sheffield Hallam University. She has been a management consultant in economic development for 20+years, and has considerable experience of economic development policy, strategy, implementation and evaluation. Since 2017 Zoe has run her own consulting business specializing in economic and social policy.

At KPMG Zoe initially led economic development work for the Regional Development Agencies, and subsequently focused on public sector reform and social care transformation. Prior to KPMG Zoe was a senior consultant at DTZ Pinda Consulting (now Cushman Wakefield) specializing in regeneration, housing and economic development, and a research manager at Ecotec (now ECORYS) designing and evaluating economic and social policy. Zoe has worked with several of the main Government Departments and Agencies, including MHCLG, DfE, Home Office, and the NHS. Other clients include CCGs, RDAs, LEPs, metropolitan local authorities, combined authorities and police forces.

Zoe has worked at the heart of public sector reform in Greater Manchester. She has drafted strategies, target operating models, business plans and established outcomes frameworks to ensure demonstrable improvements can be tracked and measured.

Peter Milway – Bio Pic

Peter Milway is an economist with 20 years professional experience delivering over 250 economic research projects. Peter's main areas of expertise include economic analysis and modelling, forecasting/scenario development, impact assessment, economic appraisals and project evaluation. Peter has a breadth of experience of assessing the impact of a wide range of investments, projects and programmes across most sectors of the economy. Peter has prepared the demand side analysis for a number of employment land and premises studies across the country including in the North West and West Midlands. Peter has also produced a variety of labour market and economic development related projects such as economic assessments and strategies for public sector clients in the North West. He has also assessed the potential impact of a number of major business parks including Wobaston Road (i54), Kingsway Business Park (Greater Manchester) and Slough Trading Estate (Berkshire). Since 2012, Peter has been a lead economist in the consortium undertaking analysis to support a series of regulatory impact assessments for the MHCLG Building Safety Programme. In addition, Peter has also been involved in a number of research projects considering the future of development, including in town centres and the development of enterprise centres.

Introduction

This short report sets out our economic overview of Greater Manchester's second Spatial Framework (GMSF) consultation document, focusing specifically on questions 36 to 40.

This report was commissioned by the Campaign to Protect Rural England (CPRE). It is based on a very high-level analysis of the GMSF, and its supporting documents. As requested by CPRE we have focussed on the economic questions, but highlight some overall comments for your consideration.

Our brief was to review the evidence base for the GMSF and inform the quantum of demand for office and industrial land identified. Due to limited resources we have not fully explored the assumptions behind all the figures. This short report is structured as follows:

This short report sets out an economic review report was commissioned by the Campaign to Protect Rural England (CPRE). It is based on a very high-level analysis of the GMSF and its supporting documents

- Section 2 provides some contextual comments and overall comments about the Spatial Framework.
 - Section 3 responds to question 36 on the proposed policy on supporting long-term economic growth.
 - Section 4 provides commentary on question 37 about employment sites and premises.
 - Section 5 comments on Q38: the proposed policy for office development.
 - Section 6 provides commentary on the proposed policy on industry and warehousing development.
 - Section 7 summaries our views and provides further comments on the overall approach to the economic policies set out in the GMSF.

Overall observations

- 2.1 In short, the objectives outlined in the GMSF broadly align with those of CPREs, in terms of reducing inequalities, improving prosperity, promoting sustainable movement of goods, people and information and moving towards a carbon neutral region.
- 2.2 On the one level the GMSF uses a very simple and clear way of forecasting future demand, essentially using past trends in the amount of floorspace completed each year and adding 50% to allow for flexibility/choice, uncertainty and growth. However, there is no real transparency into the assumptions that arrive at the numbers being used and it is not clear whether the basis of the estimates of past trends in floorspace completions represents net additional floorspace, or if it relates to transaction data, which includes both movement within GM and might also include businesses moving into older premises. In addition, even if the take-up data only represents businesses moving into new build, this methodology of forecasting demand is likely to give a highly inflated figure of demand over 20 years.
- 2.3 Some of the analysis in the SF also presents inaccurate figures – e.g. para 6.13 of the employment chapter refers to a combined effect of margin/uplift and flexibility of choice resulting in a 45% combined effect – this actual figure is 50%.
- 2.4 Greater Manchester Combined Authority acknowledge that the 50% flexibility factor is towards the upper end of that used in other employment land studies – in fact we think it is at the top end– so is quite an extreme figure.
- 2.5 Using past annual take-up figures to guide how much land could be required annually is probably sensible – but summing that over the 19 year period is going to give far too much land – because it does not allow for the space that becomes available as businesses move from one location within GM to another.
- 2.6 The employment forecasts and employment strategy are referenced within the SF, but we have struggled to understand how these figures are used to inform the demand assessment. I think they should at least acknowledge the expected trends and how their demand forecasts will accommodate their economic strategy.
- 2.7 The Accelerated Growth Scenario presented as reflecting the ambitions of the Greater Manchester strategy implies an increase in employment over the policy neutral forecasts of 82 thousand jobs resulting in an additional 56 thousand residents in GM by 2038. Therefore much of the additional growth generated by the strategy is expected to attract more in-migration into the conurbation. There could be a real concern that if the strategy does not generate the extra employment above the expected growth rate, then any housing allocated to support employment that does not materialise, will actually dilute the current employment rate.
- 2.8 We are concerned about the assumptions that have been used to arrive at the target economic growth, and the translation of that into development sites. For example, the ratio of floorspace to land area for office development in Manchester
- 2.9 We support the focus of new development on brownfield sites, but not enough consideration is given to ‘new’ brownfield sites as businesses turnover in the region.

- 2.10 We support the targets of 95% of office space and 50% of manufacturing space in urban areas, but think the city centre is possibly prioritised too much over the town centres and possibly more of this development could be directed to brownfield sites.

Q36. Long-term economic growth

- 3.1. We agree that the SF is right to focus on the city centre, but needs to ensure there is sustainable development to promote efficient travel-to-work patterns across the region. We recognise there is a balance between maximising the assets in the city centre because of the excellent transport links, but also ensuring development spreads out to the town centres.
- 3.2. The employment land strategy appears to aim to offer developers (and businesses) an extensive range of sites so that there is always a desirable site for developers. Securing growth by offering a wide range of choices to developers may be an okay short-term target if the land is available, but the longer-term strategy should be to try and rebalance the economy within Greater Manchester – and encouraging growth into areas that need it.
- 3.3. Creating the airport as a new economic focus was a strategy that was specifically refuted by the planning inspectors who sat in judgement of the, since revoked, North West Regional Spatial Strategy. They said, and we agree with them, that it could draw development away from other parts of the conurbation - and also from the nearby towns in Cheshire East such as Wilmslow and Macclesfield .
- 3.4. There could be more focus on driving economic growth in the town centres by, for example, bringing-back into use retail units as flexible work space for start-up industries.
- 3.5. We would like to see how the town centres will benefit from the recently announced £1.6bn town centre regeneration fund. Greater Manchester has a fantastic opportunity to deliver more regeneration of sites and build speculative sites for development within the existing town centres. We would like to see more focus on this in the SF.
- 3.6. We think the SF needs to build on the strengths of the conurbation to address the productivity challenge we have in Greater Manchester both between the north and south of the region, and nationally. The internal disparity within the region needs to be addressed, but we question whether there is sufficient plans to address these productivity gaps.

Q37 Employment sites and premises

- 4.1. The overall quantum of employment sites required appears overly high. The total demand is high and may result in an over-allocation of sites, which could impact on the viability of the less favourable sites to come to the market.
- 4.2. On a twenty year view it appears that there are too many sites and premises allocated, and the allocations do not pay enough attention to recognising new brownfield sites (in favourable locations) that will come forward as businesses turnover within Greater Manchester.
- 4.3. There is a balance to be struck between giving industry a choice of location to ensure the economy continues to grow, but also restricting sites so industry does not alone dictate the pattern of development – particularly in the medium to long term.
- 4.4. We believe few industries look further than 5 years ahead in their location decisions, and therefore propose that a more appropriate approach in the SF is for sites to be phased in to use. Likewise, a phased approach also allows for new brownfield sites to come forward as businesses vacate them – therefore adding to the supply of sites and reducing the need to use Greenfield sites.
- 4.5. We think it would be prudent that Greenbelt sites are safeguarded until a threshold in take-up of other sites has been met.
- 4.6. There does not seem to be much alignment between the Greater Manchester economic strategy and the location of employment sites.
- 4.7. The justification for the Greenbelt release does not seem to fit with the wider objectives of the GMSF.
- 4.8. Need more detail on the complementary locations to the strategic sites. There is reference to the “selective removal of land from the Greenbelt”, we put forward the view that the SF should minimise the need for Greenbelt release, especially that around the Airport Enterprise Zone.

Q38 Office development

- 5.1. We agree that Manchester city centre is likely to be the prime location for office market development. Current office development in the city centre is at a high density. The proposed densities outlined in the SF are less than half of current development and we think could under-estimate the potential of the sites proposed, and over-estimate the demand for them. We think the SF should increase density levels to match current development to ensure sites remain viable for developers.
- 5.2. The concern about a shortage of “Grade A” office space is probably misplaced. The low vacancy levels within the Grade A office space reflects the incentives that new buildings offer tenants to move into these premises. Therefore you would expect most Grade A space to be occupied, as landlords and developers seek to recoup their investment.
- 5.3. We also agree with the numbers proposed, but do not think they are allocated in the right places. We think there is an over-allocation in the city centre.
- 5.4. There is an obvious need to accommodate market demands, but there is also an incentive to ensure existing space in the city and town centres is regenerated and used optimally.
- 5.5. It is not likely that the proposed office development in Rochdale, Oldham and Wigan will be needed at the levels outlined in the SF due to the economic trends of these areas.
- 5.6. The SF does not appear to incentivise developers to go out of Manchester, we think more could be done to promote office development in the town centres.
- 5.7. The SF does not address how much office space is currently being converted into alternative uses both within Manchester City Centre and the town centres. There is no analysis of what is expected to happen.

Q39 Industry and warehousing development

- 6.1. New industrial space is currently proposed as being in high demand in the SF, yet the SF 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. The SF needs to respond to the challenge of ensuring businesses are able to find appropriate premises while managing the likely overall reduction in amount of occupied industrial space. Current analysis in the SF appears to only include gross demand for new space and does not consider business turnover rates in the region, which reflects how the development market works.
- 6.2. In the industrial sector, there has been an annual decline in the amount of floorspace occupied in GM each year for the 15 years between 2000/1 to 2015/16 (using Valuation Office Rateable Floorspace statistics)¹ and this is expected to continue (the employment forecasts expect a further 30% decline in manufacturing employment by 2038) – so there should be a lot of vacant space becoming available over the period which could be added in – typically known as ‘windfall sites’.
- 6.3. Over the 15 years there has been a net reduction in the amount of rateable industrial space of 4.6 million sqm. We expect that a significant proportion of this former industrial space now makes up the portfolio of brownfield sites proposed for redevelopment. Given the employment forecasts, we expect that this trend will most likely continue. Without an appropriate strategy to manage existing industrial areas there is a risk of a continued expansion onto new sites while leaving older sites vacant and derelict.
- 6.4. There is concern that the estimate of need for more industrial floorspace is over inflated to build-in too many upward adjustment factors (adjustments to account for the recession, allow for margin and allow for flexibility). We suggest that the 25% uncertainty in the market could be managed in different ways, whilst allowing flexibility in the marketplace.
- 6.5. The quantum of industry and warehousing sites is inflated over a 20 year period. The total amount of space required is likely to be less, and potential windfall sites need to be factored into the analysis. The result of the current strategy to provide a large number of new industrial sites could result in an increasing volume of vacant or derelict brownfield sites.
- 6.6. We would like to see phasing of any new sites to ensure prime sites are prioritised. There needs to be more focus on short to medium term needs, rather than the longer-term needs to ensure sites are sustainably phased into use.
- 6.7. Growth is focussed on logistics, which is not typically high skilled, and high value, despite the SF focussing on addressing the productivity gap.

¹ <https://www.gov.uk/government/statistics/non-domestic-rating-business-floorspace>

- 6.8. We think the SF could prioritise building on the region's strengths in high value and advanced manufacturing to increase the productivity challenges we have in Greater Manchester.
- 6.9. The SF needs to consider the risk factors of development including low skilled jobs, sustainable travel to work patterns, HGV movements across the region, and the proposed large floorplates of industrial and warehousing premises. The focus on logistics in the North of the region could lead to increased congestion on the region's already congested motorway network.
- 6.10. There needs to be a focus on allocating sites that are close to where people live to ensure sustainable transport patterns. And prioritise smaller sites in the town centres to be made more attractive to host some of the proposed development to meet the 'diverse' supply required.

Summary

- 7.1. The Greater Manchester Spatial Framework has a tricky balancing act between short-term meeting market pressures and longer-term shaping the future of Greater Manchester's market. There is a fine balance between ensuring that growth is attracted to Greater Manchester without constraining developers, and simultaneously maintaining the attractive environment.

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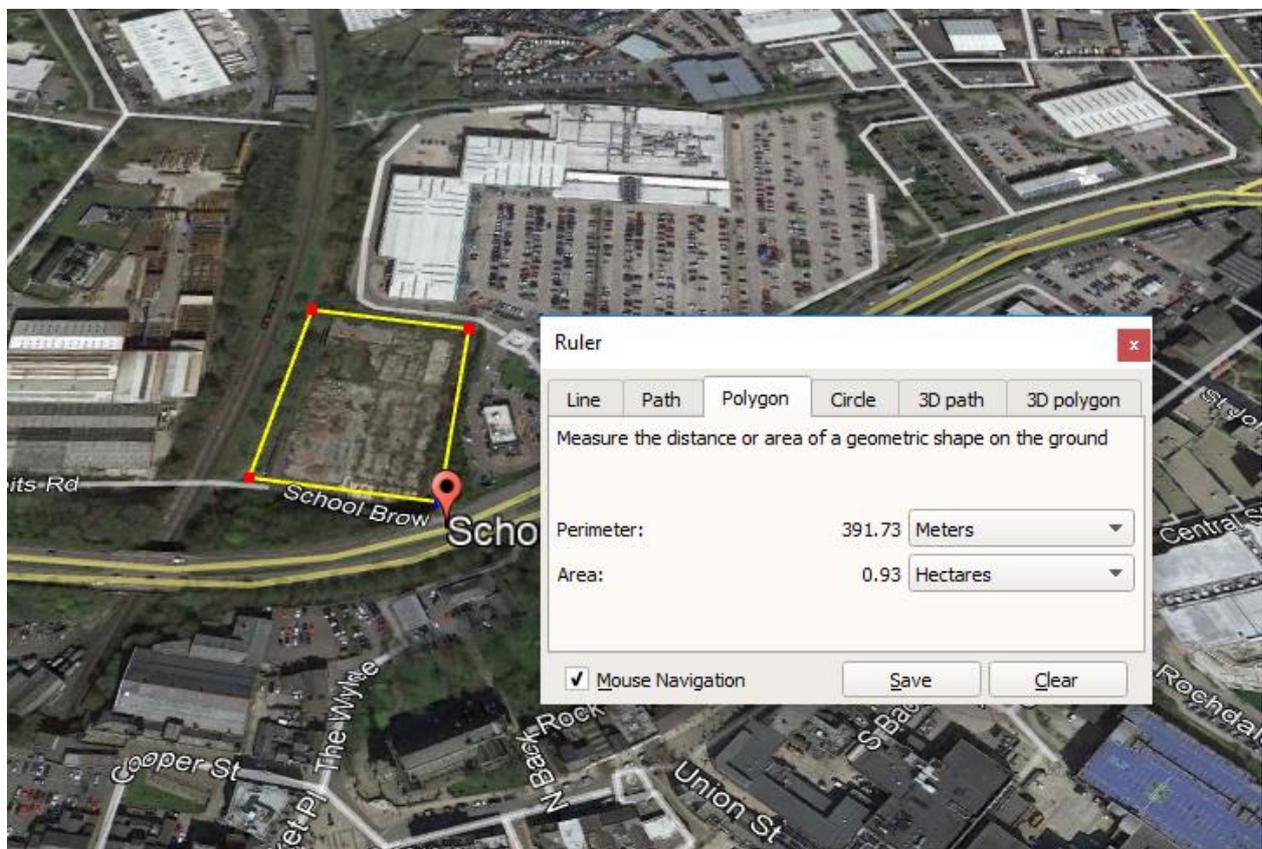
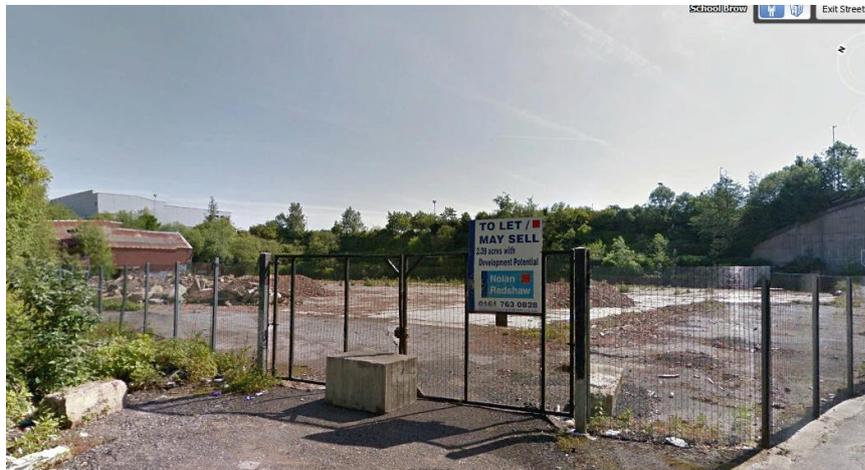
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Appendix 3.0 Example CPRE Brownfield Land Register Toolkit - sites not shown on the GMCA GMOD Map - Greater Manchester Brownfield Land Register

1. Name and address / site location	Land at School Brow, A56 Peel Way, Bury
2. Site Size, in hectares (approximate)	0.93 ha

3. Photos of site



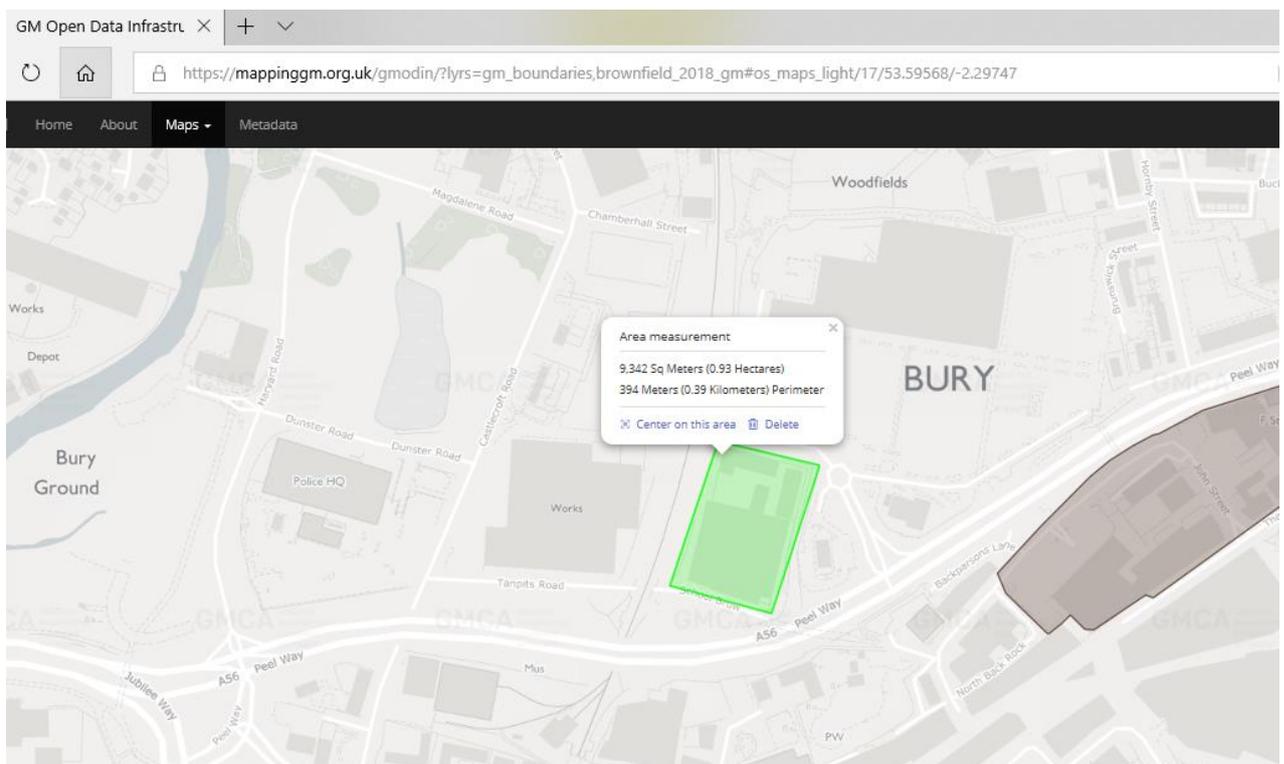
GoogleEarth Shows site to be vacant at

4. Existing land use	Vacant
5. If vacant, what was its former use?	Manufacturing

6. Description of surrounding land uses	North - Retail - Tesco East Fast Food - MacDonald's South - A56 Peel Way, Bury Parish Church West - railway line borders the site, then manufacturing, and police station facing Dunster Road
7. Is the land greenfield, brownfield, or a mixture of both?	Brownfield
8. Who owns the site?	? Nolan Redshaw is agent To Let/May Sell
9. Developer interest - is there a developer interested in the site?	?
10. Timescale - will development occur in the next 5 years?	Could come forward
11. Planning Status - does the site have, or is it awaiting a decision on, planning permission: Don't Know If Yes, is it: <input type="checkbox"/> Full <input type="checkbox"/> Outline <input type="checkbox"/> Reserved Matters	Please add dates of any permissions granted, Reference Numbers, and any other details here
12. Planning history	?
13. Housing Capacity - estimate the number of homes, and type of housing (and other) development that would be appropriate: <input type="checkbox"/> Terraced <input type="checkbox"/> Town houses <input type="checkbox"/> Low rise flats <input type="checkbox"/> x Medium rise flats/underground parking <input type="checkbox"/> Semi detached <input type="checkbox"/> Detached	Please provide estimated numbers and further details here Town Centre location, medium rise flats at between 70-120 dwellings per hectare, 0.93 hectares would equate to a range of between 65 and 111 dwellings.
14. Is the site part of a larger site?	It could incorporate land to the south
15. Does the site (or larger site of which it is a part) cross a boundary with another council?	No
16. Suitability for housing - why do you think the site is suitable for housing?	Close to town centre/ transport links/ shops, bus stops nearby. Ranked as 7 for GM accessibility level A56 Peel Way is an Air Quality Management Area
17. Site Constraints - are you	N/K

<p>aware of anything that is likely to constrain development of the site?</p>	
<p><i>17a - d Site Constraints</i></p> <p><i>17 a. Connectivity / capacity</i> Telecommunications equipment <input type="checkbox"/> x Y Mains water supply <input checked="" type="checkbox"/> Y Waste water / sewage <input type="checkbox"/> x Y Gas <input type="checkbox"/> x Y Electricity <input type="checkbox"/> x Y Drainage <input type="checkbox"/> Y Highways / accessibility <input type="checkbox"/> x Y</p>	<p>Please provide further details here</p> <p>Don't have information to supply</p>
<p><i>17 b. Land & buildings</i></p> <p>Topography (slopes etc) <input type="checkbox"/> x Ground conditions <input type="checkbox"/> x Y Land stability <input checked="" type="checkbox"/> Y Derelict structures <input type="checkbox"/> x N Contaminated land <input type="checkbox"/> N</p>	<p>Please provide further details here</p> <p>A flat site with secure perimeter fence.</p> <p>There appears to be a hard-surface to much of the site, although the buildings are cleared</p> <p>Contamination not known</p>
<p><i>17 c. Natural environment & built heritage</i></p> <p>Wildlife / habitat <input type="checkbox"/> x N Trees / tree protection orders <input type="checkbox"/> x N Hedgerows <input type="checkbox"/> x N Woodland <input type="checkbox"/> x N Landscape <input type="checkbox"/> x N Heritage (e.g. listed buildings, conservation areas, scheduled monuments)</p>	<p>Please provide further details here.</p> <p>Wildlife not known</p> <p>There are some shrubs at the perimeter, and along with the green natural area alongside the railway line this may provide some habitat for foxes, bats, etc</p> <p>This is a built landscape</p> <p>There is no heritage properties identified at the site, although the Bury Parish Church may be listed.</p>

<input type="checkbox"/> x N Flood risk x <input type="checkbox"/> N	?
17 d. Health & amenity Recreation / open space <input type="checkbox"/> x N Air quality <input type="checkbox"/> x Y Noise <input type="checkbox"/> x N Vibration <input type="checkbox"/> x N Pollution / contamination <input type="checkbox"/> x N	Please provide further details here No public access on to the site
18. Harmful Impacts - Would development have adverse impacts on wildlife and nature, the built environment (especially historic features) or local amenity not detailed above?	No
19. Any additional information	



GMODIN the Brownfield Register or existing supply of industrial and warehousing or housing layer search does not show this site on in 2018, 2017, or Pilot.

CPRE Lancashire will work with community groups to complete the Toolkit and send to the local planning department to help record more brownfield land.