



The countryside charity
Lancashire, Liverpool City Region
and Greater Manchester



The countryside charity
Cheshire



The countryside charity
Peak District and
South Yorkshire

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03 October 2021

Patron
Her Majesty the Queen
President
Emma Bridgewater
Chair
Debra McConnell

Dear GMCA Planning and Housing Team,

I am writing a joint response on behalf of the Campaign to Protect Rural England's (CPRE) Lancashire, Liverpool City Region and Greater Manchester, Cheshire, and South Yorkshire and Peak District areas (herein CPRE) in response to the: **'Places For Everyone': Joint Development Plan (JDP) Document for Bolton, Bury, Manchester, Oldham, Rochdale, Salford, Tameside, Trafford and Wigan, August 2021.**

We are CPRE, We are The countryside charity. We want a thriving, beautiful countryside for everyone.

We believe in countryside and green spaces being accessible to all, rich in nature and playing a crucial role in responding to the climate emergency.

With CPRE group represented in every part of England, we're advocating nationwide for the kind of countryside we all want: one with sustainable, healthy communities and available to more people than ever, including those who haven't benefited before.

We stand for a countryside that enriches all our lives, regenerating our wellbeing, and that we in turn regenerate, protect and celebrate.

We've worked for almost a century to support and promote the countryside, and we'll be doing this for generations to come. That's why we call ourselves 'the countryside charity'.

We are members of the 'Smart Growth Coalition' as well as the Rural Coalition. A key part of our vision is a low carbon countryside that mitigates and adapts to the impacts of climate emergency and tackles air pollution.

We acknowledge the hard work of the Greater Manchester Planning and Housing Team and the officers of the nine constituent authorities in progressing the spatial plan thus far and are pleased that many of the concerns that CPRE and local communities across Greater Manchester have raised at earlier consultations stages have been heard, with associated refinement to the proposed policy wording and land allocations.

CPRE champions the reuse of the significant brownfield land resources of the nine local planning authorities in advance of our greenfields, as does Government in its National Planning Policy Framework (NPPF), July 2012 Section 11: Making effective use of land, so we are delighted with the brownfield preference approach. It is also important for rural places to have more affordable homes, meaning in perpetuity low-cost social housing.

That said, there are still some important countryside and open greenspace concerns for CPRE to address. When considered in entirety, it appears that economic factors take priority over social and environmental ones and therefore the spatial plan is imbalanced. For example, the high quantum of development identified is overly ambitious when considering the reality of the economy and the latest Office of National Statistic (ONS) population data. In addition, the site selection promotes development of greenfield land at the rural fringe and open greenspace and this is contrary to the spatial distribution of development that the '*Places for Everyone*' Vision and Strategic Objectives aim to achieve. Without some further adjustments, it will not support the ambition of a carbon-neutral city region by 2038, a laudable and necessary aim.

Below, I set out CPRE comments in response to the various sections of the JDP document. Our aim is to ensure the spatial plan capitalises on opportunities to regenerate the urban cities and towns and in doing so, best protect and enhance the rural areas, Green Belt and urban greenspace of Greater Manchester for everyone's benefit in the future. We would like our representation to aid the examination and wish to take part as appropriate at the hearings.

It is recognised that without a democratically adopted spatial framework our countryside and open greenspace across Greater Manchester is more vulnerable to speculative development, so we do hope the policies and allocations are progressed to better steer future development to the most sustainable places without further delay.

If you require any further information, please do not hesitate to contact me.

Yours sincerely

Jackie Copley MRTPI MA BA(Hons) PgCERT
Planning Manager

'Places For Everyone': Joint Development Plan (JDP) Document for Bolton, Bury, Manchester, Oldham, Rochdale, Salford, Tameside, Trafford and Wigan, August 2021

1. Introduction

- 1.1. CPRE is a long-standing advocate of democratically driven strategic spatial plans as they are the best way to protect rural places, Green Belt and important open spaces from harmful speculative development, and to steer development that 'really is sustainable'. We recognise the progress made by the Greater Manchester Combined Authority (GMCA) on the Greater Manchester Spatial Framework (GMSF) and its successor document, although we do have issues particularly with housing numbers and the amount of land being sought for roads and employment use in view of the massive increase in home working. Land is a finite resource.
- 1.2. This consultation will be undertaken under Regulation 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012. This is known as the 'Publication Stage', a formal consultation on the draft joint DPD which it is intended to submit to the Secretary of State for examination. We therefore consider the *Places for Everyone* policies and allocations on the basis of the test of soundness as set out in the NPPF:
 - Positively prepared;
 - Justified;
 - Effective; and,
 - Consistent with national policy.
- 1.3. We consider *'Places for Everyone'* to be an improvement on earlier versions of the GMSF. This is essentially because of the increased brownfield focus, in line with public opinion, and the national planning policy as set out in the NPPF's Section 11: Making effective use of land, which promotes as much use as possible of previously developed or 'brownfield' land. That said, as a teacher's report might say, GMCA 'could do better'. Even the Plan itself acknowledges that less than half of the industrial and warehousing development proposed for the Plan period would be within the urban area (paragraph 1.42) and the sheer volume of land proposed for these uses has to be questionable in view of the new economic realities.
- 1.4. For instance, paragraph 1.9 of the Introduction states that, after delays due to the Covid-19 pandemic: *"There was insufficient evidence (either at a national or local level) to change the assumptions behind the growth targets underpinning the 'Places for Everyone' Plan"*. (Our highlighting and underlining). We challenge this statement. The spatial framework should reflect the new realities. Following the rapid introduction of online conferencing as an everyday business tool during the pandemic lockdowns and the realisation that large numbers of people can actually work very successfully this way, less land will be needed for workspaces due to far less people being required in future to attend a formal employment space for work, less people will work a '9 to 5' day and there will be less pressure on roads at peak times.
- 1.5. Prior to the pandemic, the average percentage of working people across the country who already worked from home some or all of the time had risen to 18%. Research from the Chartered Institute of Personnel and Development (CIPD) published in July 2021 shows that, post

pandemic, 37% are expected to work from home on a regular basis and some 22% would work from home all of the time, compared to 9% pre-pandemic (<https://www.cipd.co.uk/about/media/press/home-working-increases>). So, nearly a quarter of the workforce is not going to be commuting at all and over a third of the workforce is only going to be commuting occasionally.

- 1.6. Meanwhile, an employer survey conducted by Howden Benefits and Wellbeing Consultancy, also published in July, found that as many as 88% of employers expect to facilitate home working to some extent post pandemic (<https://employernews.co.uk/news/survey-finds-huge-rise-in-home-working-increased-human-resources-workloads/>).
- 1.7. With such seismic changes taking place in the workplace, the '*Places for Everyone*' document should have had some adjustments made to it. Some areas currently designated for employment purposes could have been allocated to housing, saving the need for some greenfield housing developments. This, in turn, would have helped towards the ambitions of the nine Greater Manchester authorities to be carbon neutral by 2038 (para. 1.15).
- 1.8. Consequently, we cannot support the statement in paragraph 1.47 that the release of Green Belt "has been kept to the minimum" – and the claim that the **net** reduction in Green Belt amounts to 1,754 hectares, ie. 3.3% of the existing, is somewhat disingenuous. This is because Green Belt is lost with many of the site allocations, but the total figure is not provided for the amount of current Green Belt that would be taken. Instead, the document merely offers a net loss figure after adding in newly designated Green Belt (paras. 1.48 – 1.50 inc).
- 1.9. We would also argue that the statement in paragraph 1.55 about the Transport Delivery Plan is somewhat misleading as it only mentions sustainable transport and how this would contribute to carbon reduction goals. When in fact the Greater Manchester Transport Strategy 2040 and the five-years transport delivery plan (2021-26) make it all too apparent that road building is very much still a key part of transport plans. The former document provides an extensive list of areas that need "a more reliable highway network" (pages 109-114 inc) and the latter document provides illustrations of any number of schemes including the M58 Link Road and, the A57 Mottram Moor Link Road which would impact on countryside including Green Belt and the Peak District National Park. And, apart from their landscape and other impacts, such schemes do not fit well with the promise to become carbon neutral by 2038 (para. 1.52).
- 1.10. As stated, an adopted spatial framework ought to better protect the countryside and greenspace of Greater Manchester while delivering enough needed development, so we make comments with this in mind. Improvements we seek include a reduction in B8 employment use focused at open land in the Green Belt and the removal of allocations where the environmental impact is too great. We offer solutions to where policy ought to be amended, such as maximising density of development, so enough housing is forthcoming and that '*Places for Everyone*' can be found sound against the above mentioned NPPF tests. CPRE looks forward to such a revised plan being adopted.

- 1.11. CPRE is cognisant, of course, that Stockport Council decided not to approve the last version of the GMSF and to pursue, instead, its own local plan. We recognise that a key reason was the amount of land in Green Belt proposed for development that was vehemently opposed. It will be interesting to see whether Stockport can defend its Green Belt any better through the adoption of its own local plan and we trust this will happen without delay, as countryside is most vulnerable to development without an up to date adopted local plan.

2. Context

- 2.1. CPRE broadly agrees with the context, although we question whether the falling population growth projections since 2018 have been fully taken into consideration (paras. 2.4 & 2.29). According to the Office for National Statistics, UK population growth slowed after the 2016-based projections. The projected population will be 0.4 million less in mid 2028 and 0.9 million less in mid-2043 (<https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationprojections/bulletins/nationalpopulationprojections/2018based>).
- 2.2. Previously we commented that the GM spatial plan should plan for:
- the climate emergency and the need to reduce carbon and greenhouse gas emissions;
 - a greater focus on urban regeneration
 - reducing the need to travel and for more home-working;
 - reduced passenger throughput and freight at Manchester Airport;
 - a greater modal shift of freight to rail and water to reduce road haulage;
 - people should rely on more sustainable travel options, and be supported by cleaner and more energy efficient public transport services;
 - the Northern Powerhouse Rail proposals to improve connectivity and not harm our rural landscapes, although we reserve our opinion on a suggested new rail route between Manchester and Bradford as no alignment has yet been made public.
- 2.3. The year 2020 was challenging for everyone with the Covid pandemic. Of note, increasingly, people found that their priority was having locally accessible quality greenspace for its health and well-being value.
- 2.4. *'Places for Everyone'* should embed the positive spin-offs, such as more cycling and walking and the acceleration in flexible working. Urban greenspace is always under development pressure and it is vital that it is positively protected and enhanced.

3. Vision

- 3.1. CPRE broadly agrees with the vision, but recommends a reordering of the bullet points and minor edit so the urgency of the climate emergency is fully translated. Recommended wording is below:

Our vision is to make Greater Manchester one of the best places in the world to grow up, get on and grow old:

- A place at the forefront of climate emergency action with clean air and a flourishing natural environment.
- A place where all children are given the best start in life and young people grow up inspired to exceed expectations.
- A place where people are proud to live, with a decent home, a fulfilling job, and stress-free journeys the norm. But if you need a helping hand you'll get it.
- A place of ideas and invention, with a modern and productive economy that draws in investment, visitors and talent.
- A place where people live healthy lives and older people are valued.
- A place where all voices are heard and where, working together, we can shape our future.

Strategic Objectives

- 3.2. *'Places for Everyone'* should order being carbon neutral and improved quality of environment as the first and second strategic objectives. We do not accept that the ambition to focus growth at the airport is compatible with ambitions to be carbon neutral by 2038.

4. Strategy

- 4.1. CPRE broadly agrees with the Strategy and particularly with the acceptance of the need to carefully manage finite land resources (paras. 4.8 - 4.14) and of the fact that Greater Manchester cannot continue to grow indefinitely. CPRE is supportive of inclusive growth, and for GMCA to tackle deprivation and support areas that traditionally have had least investment to prosper in the future we therefore agree with Figure 4.1 Spatial Strategy and Figure 4.2 Core Growth Area. Focusing on brownfield and making the most of higher density development in town and city centres will help to revitalise places currently experiencing market decline.
- 4.2. That said, we need to point out here that, due to the timing of a government announcement, the *'Places for Everyone'* document has not taken into account the undoubtedly significant effect that there will be from the granting of permitted development rights – and a change to the use class system – which together allow commercial premises such as shops to be changed to residential use without planning permission. We do have sympathy with the planners in this instance because the announcement was only made in the Spring and it came into force on August 1st immediately before the consultation on *'Places for Everyone'* went live. However, the fact of the matter is that this change will dramatically alter the number of housing units coming forward. These were not anticipated at the time the Plan was written and sanctioned by the nine local authorities. We would argue that when these contributions are counted – whether that be as 'windfalls' or in another way – they will remove pressure to release Green Belt and open spaces.
- 4.3. In addition, whilst we accept the need to encourage investment in areas of underinvestment in the past, we query why there is over-planning of employment development due to the excessive scale of employment ambitions in the 'Northern Areas' (Policy JP-Strat-6), in the North East Growth Corridor (Policy JP-Strat 7) and in the Wigan-Bolton Growth Corridor (Policy JP-Strat 8). We ask whether such large tracts of land dedicated to employment can still be justified in the

light of altered working patterns due to the coronavirus pandemic – especially where they involve the loss of Green Belt?

- 4.4. Furthermore, CPRE is concerned that logistics is identified as a ‘prime sector’ due to the impacts of Covid and Brexit. There is likely to be a very different economic backdrop. Much more pessimistic than the economic evidence base suggests. B8 warehousing has extremely large footprints, is usually always road-based, and located in Green Belt with very low job density. The sector is of low economic value because it does not add value to products, it merely sorts and distributes them. There is considerable environmental harm for limited benefit as the jobs are low paid, low skilled, on insecure contracts and likely to be replaced through automation. Of concern to CPRE is there has been a surge in ‘*off local plan*’ applications and the Green Belt along the motorway has been pepper-potted with huge sheds causing significant landscape harm. Currently there are driver shortages in the haulage sector as the standards of employment are so poor. Boris Johnson, the Prime Minister, announced to the Conservative Party Conference in Manchester today that the Government’s approach to the economy post-pandemic must change.
- 4.5. CPRE is opposed to *Policy JP-Strat 10 Manchester Airport* as flying is the most unsustainable form of transport and therefore expansion in airport activity would not support the carbon-neutral ambitions of GMCA, nor can *Policy JP-Strat 11 New Carrington* as a new road and major housing and employment developments will have a harmful impact on peat mossland that is of rarity and importance for carbon sequestration and biodiversity.
- 4.6. We can support the intention to get more housing into town centres (*Policy JP-Strat 12 Main Town Centres*) and the policies on Strategic Green Infrastructure (*Policy JP-Strat 13*) and a Sustainable and Integrated Transport Network (*Policy JP-Strat 14*), which are based on sustainable development principles.

Policy JP-Strat 1 Core Growth Area, Policy JP-Strat 2 City Centre, Policy JP-Strat 3 The Quays, Policy JP-Strat 5 Inner Areas and Policy JP-Strat 12 Main Town Centres

- 4.7. CPRE is a member of the Smart Growth Coalition. It believes that, wherever possible, development should be focused on cities, towns and existing urban areas and particularly on areas in need of regeneration. We therefore support these policies which seek to bring more housing into the core areas and which intend to regenerate areas of deprivation. Such policies help to remove the development pressures from the countryside and ensure that those businesses which are located in such areas have inbuilt demand.

Policy JP-Strat 4 Port Salford

5. Although we hope the tri-modal Port Salford does enable movement of freight from road to rail and particularly water we are concerned at any further loss of Green Belt for this purpose. The Green Belt here performs an important ‘green lung’ function as well as most of the five Green Belt purposes set out in the NPPF. At the specific location air quality is already very poor and it should be noted that the World Health Organisation has tightened its air pollution guidelines after

evidence that toxic particles and gases harm health at much lower levels than previously thought. Also, the Homes and Community Agency Employment Density Guide 3rd edition, November 2015 shows one job per 77sqm. This means a large amount of Green Belt loss for relatively few jobs. .

Policy JP-Strat 6 Northern Areas, JP- Strat 7 North East Growth Corridor and Policy JP-Strat 8 Wigan-Bolton Growth Corridor

- 5.1. Whilst CPRE concurs with GMCA's desire to see more wealth distribution to these areas, we contend that the forecast growth predicted for them is based on a shaky footing and more research should be done to understand the impacts of Covid and Brexit. The scale of the areas proposed for employment use is unrealistic and some of the sites listed are currently the subject of planning inquiry due to Secretary of State 'Call-In' of local decisions. Also, CPRE have historically objected to the new highway infrastructure reaching from junction 26 of the M6 to junction 5 of the M61, which, as fig. 4.6 clearly shows, passes through areas of Green Belt and alongside Hulton Park. As a result, we cannot support these policies.
- 5.2. Despite significant local opposition, Hulton Park was approved for the development of a Ryder Cup standard golf course, with an important condition that CPRE managed to secure of 'no Ryder Cup, no development' as it is only with the benefits of the Ryder Cup the Secretary of State accepted very special circumstances would exist to justify the harm to Green Belt and the historic landscape fabric of Grade II Registered Hulton Park and Garden. The developer is now seeking a new development for a health-related leisure facility, presumably as even it acknowledges its aspirations to host the renown golf event is at best unlikely. CPRE retains its objection and recommends that Bolton Council and the GMCA reconsider their support due to the limited public benefit.

Policy JP-Strat 9 Southern Areas and Policy JP-Strat 10 Manchester Airport Policy

- 5.3. CPRE remains opposed to the expansion of Manchester Airport on land in the Green Belt. It is also opposed to the M56 J6 to J8 smart motorway scheme (para. 4.68) which merely encourages more people to access the airport and central Manchester by road. Quite apart from the safety implications of making hard shoulders running lanes, an issue which has come to the fore recently. It is considered that '*Places for Everyone*' cannot enable carbon zero by 2038 or 2050 if it adopts these policies, both of which seek to promote/further expand Manchester Airport. We will also question with Stockport Council the proposal to assign 100,000 sqm of commercial floorspace with the creation of the first Mayoral Development Corporation in the light of the changes in working patterns post Covid. (See our comments in paras. 1.4 to 1.7 inclusive).

JP-Strat 11 New Carrington

- 5.4. CPRE supports the reuse of the brownfield element of this strategic site, but due to the natural capital value of the unbuilt part in Green Belt, it is opposed to this being brought forward for development. We are pleased to see a reduction from 6,100 to 4,300 houses and the amount of employment floorspace reduced from 410,000sq.m to 350,000sq.m. That said, it is possible to further reduce the development quantum, so that more farmland and priority habitat of significance (UK Biodiversity Action Plan) can remain for the benefit of future generations.

Policy JP-Strat 13 Strategic Green Infrastructure

- 5.5. CPRE would be able to support this policy if it were adjusted to include hedgerows. The Hedgerows Regulations were introduced in 1997 and there is a statutory requirement for local planning authorities to look after those considered important, i.e. those over 20 metres long and at least 30 years old and that are home to a stipulated number of plant or animal species. The historical significance and whether or not they contain features like a hedge bank, ditch or tree are also taken into account. CPRE recently published research undertaken independently with the Organic Research Centre www.cpre.org.uk/ORC21, which highlights that one of the best ways to simultaneously tackle the climate crisis, boost nature and grow our economy is by restoring and increasing the UK's hedgerow network. Hedgerows are a haven for nature, they remove carbon from the atmosphere and support sustainable local economies, but, shockingly, we have lost 50% of our hedgerows since the Second World War and they are still in decline. CPRE recommends that the policy should include specific reference to hedgerows in this policy due to their immense value.

Policy JP-Strat 14 A Sustainable and Integrated Transport Network

- 5.6. The policy has been strengthened with reference to the local programme of investment. These, together with national, sub national and pan regional projects, will ensure that residents in Greater Manchester will have access to economic opportunities.
- 5.7. CPRE observes that, for years, the rail infrastructure has been underinvested in the North, and it needs rail connectivity comparable with the South. Hopefully, this will change as changes to the Green Book appraisal approach of Government are made that remove bias spending towards the South.
- 5.8. Whilst we want to see a modal shift to cleaner public transport from dirtier private motor vehicles and support investment in rail, we remain opposed to the HS2 Phase 2b due to the harm to countryside in protected Green Belt at some distance from Manchester Airport. There is also the increased probability that due to spiralling costs and environmental harm that come with HS2, it will only extend as far as Crewe.
- 5.9. With the exception of the reference to HS2, the 'Sustainable and Integrated Transport Network' policy appears, on the face of it, to be eminently supportable. However, it is cleverly contrived to hide the fact that it supports several large road projects. It refers to: "The local programme of investment needs to be complemented by significant national and regional projects such as HS2". The "significant national and regional projects", loosely referred to here, include a number of motorway and primary network schemes such as the A57 Mottram Bypass and the road scheme referenced in the Wigan-Bolton road corridor policy. But, to fully understand the extent of Greater Manchester's support for road proposals, it is necessary to cross-reference to the Greater Manchester Transport Plan 2040 and also the five-year transport delivery plan (2021-26). However, it is noticeable that this policy fails to do that. All of these motorway and other major road schemes totally undermine and more than cancel out the much more modest sustainable transport schemes and will result, amongst other things, in worse air quality.

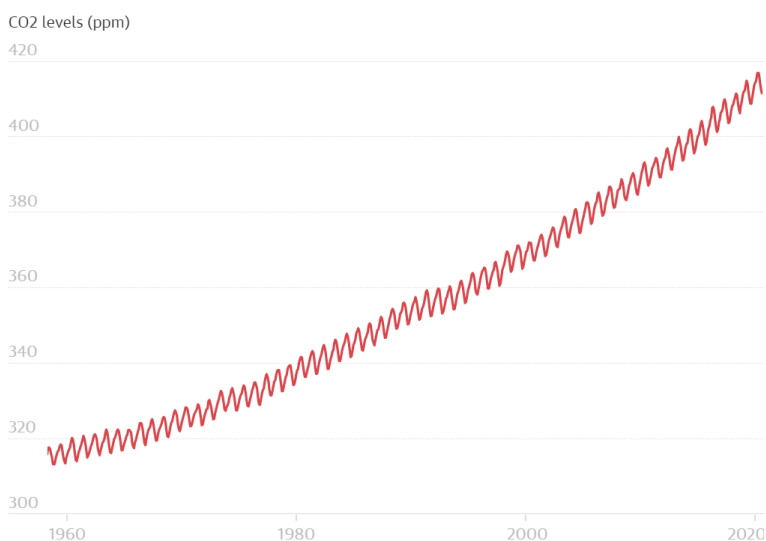
5.10. Under its new guidelines, the World Health Organisation recommends that concentrations of PM2.5 and NO2 should not exceed an annual mean concentration of 5 micro-grams per cubic metre and 10 micro-grams per cubic metre respectively. The motorway network in Greater Manchester already exceeds the current UK limits of 20 micrograms per cubic metre. The supported road upgrades/ improvements in and immediately adjoining Greater Manchester can simply not be justified on health grounds, let alone all the other arguments around induced traffic, noise, landscape impacts, severance, etc. We therefore object to this policy.

1. Sustainable and Resilient Places

JP-S 1 Sustainable Development

- 1.1. CPRE supports Policy JP-S 1 Sustainable Development which has been strengthened by the addition of the text “In bringing forward previously developed sites for development, particular attention will be paid to tackling land contamination and stability issues, ensuring that appropriate mitigation and remediation is implemented to enable sites to be brought back into use effectively”. It is important we reuse previously developed sites as these are often located in central urban locations and have good transport links, promoting walking, cycling and use of public transport.
- 1.2. This policy is justified as there has been a rapid rise in atmospheric CO² (see graph below) despite international commitments. The Government introduced the Statutory Instrument 1056 Climate Change: The Climate Change Act (2050 Target Amendment) Order 2019, which based on scientific knowledge gave the Secretary of State the duty to ensure net UK carbon for the year 2050 is 100% lower than the 1990 baseline.

Atmospheric CO2 continues to rise rapidly in 2020



- 1.3. An important change for planning is the increased urgency and significance of actions required to address climate change and sustainability. This has been predicted for many years but is most evident from the Intergovernmental Panel on Climate Change report of 9 August 2021. The critical and existential nature of current threats require a radical review of all planning policies affected by climate change and sustainability.

- 1.4. We also support Policy JP-S 2 Carbon and Energy that states Greater Manchester is to be carbon neutral by 2038. On the one hand, we congratulate GMCA for showing real ambition and leadership on this pressing issue but, on the other, we must question how it can support the “significant national and regional projects, which includes several major road schemes as they do not support the carbon neutral ambition.
- 1.5. Due to the scale of greenhouse gases that come from existing residential land use, CPRE is pleased that the first bullet refers to “Promoting the retrofitting of existing buildings with measures to improve energy efficiency and generate renewable and low carbon energy, heating and cooling.”
- 1.6. Also, that the second is, “Promoting the use of life cycle cost and carbon assessment tools to ensure the long-term impacts from development can be captured”. Both the Town and Country Planning Association and Royal Town Planning Institute promote local plans that promote climate change action and recommend setting out the baseline carbon dioxide emissions and then the actions needed to reduce emissions over time – which, in turn, means that annual monitoring reports should contain ongoing assessments of carbon performance against the Climate Change Act target. It accords with the NPPF policies on climate change. This policy is sound.
- 1.7. In Table 5.1 CPRE recommends that ‘*Places for Everyone*’ should be more precise about how much renewable energy would be needed, across the different types and stated in MW and MWhpa. For example, in Cheshire West and Chester it is proposed that there is a need to significantly increase wind capacity by 2050 (from 50MW to 400MW).
- 1.8. We agree with text paragraph 5.19 but, due to climate change and safety concerns, CPRE retains its objection to the principle of shale gas as a transitional fuel. CPRE Lancashire, Liverpool City Region and Greater Manchester engaged with the Oil and Gas Authority and the Environment Agency expressing concern over inadequacies with the regulation of hydraulically fracturing process of wells, and associated environmental regulation. The methane emissions associated with fracking and other stimulation, such as acidisation, is very high. Recently Cuadrilla handed back its licences to explore for shale gas in Fylde due to the seismic events in the highly faulted geology, concluding shale gas wasn’t commercially viable. CPRE agrees that hydrocarbons should remain in the ground.
- 1.9. Policy bullet 6. “Increasing the range of nature based solutions including carbon sequestration through the restoration of peat-based habitats, woodland management, tree-planting and natural flood management techniques”, is also a Policy that meets the NPPF tests. However, it raises concerns with some of the sites allocated, particularly Carrington Moss in Trafford. See our comments, under the *Site Allocations* section.
- 1.10. The energy hierarchy is an approach we advocate Minimising energy demand is crucial and it is a move away from growth at all costs, which promotes sustainable development.

- 1.11. CPRE is encouraging local planning authorities to review their local plans against the updated targets to ensure they are compliant and GMCA's Policy JP-S 2 Carbon and Energy is an exemplar.
- 1.12. CPRE believes the following are sound:
- Policy JP-S 3 Heat and Energy Networks
 - Policy JP-S 4 Resilience
 - Policy JP-S 5 Flood Risk and the Water Environment
 - Policy JP-S 6 Clean Air
 - Policy JP-S 7 Resource Efficiency
- 1.13. Regarding Policy JP-S 6 Clean Air, CPRE wishes to highlight the ruling at the Southwark Coroner's Court concerning the death of Ella Kissi Debrah, due to excessive air pollution and children's health. No one else should suffer negative health impacts, let alone death, as a result of poor spatial planning. <https://www.cnn.com/2020/12/16/uk/air-pollution-death-ella-kissi-debrah-uk-gbr-intl/index.html>
- 1.14. CPRE trusts the examiner will support the GMCA ambition to be a leader in climate change action in line with Government climate change commitments.

2. Places for Jobs

- 2.1. CPRE hopes Greater Manchester will have a sustainable and prosperous economy in the future.

Policy JP-J 1 Supporting Long-Term Economic Growth

- 2.2. GMCA should build on the area's strengths and promote diversity and resilience based on sustainable development principles. To this end, the growth of road based B8 logistics seems incompatible with the Climate Act 2008 and other NPPF policy that promotes a better environment and health and well-being benefits in the future. CPRE does not understand how importing more cheap plastic from Southeast Asia will improve our GVA or national balance of payments. The impacts of Brexit are not fully understood.
- 2.3. Rather, the contribution of the rural economy from agriculture and the visitor economy should be fully considered and supported. Before Covid the food and drink industry was a growth sector, but this has been hit particularly harshly by the Tier 3 lockdown rules that entirely shut the food and drink industry for months. We trust the sector will bounce back and will have multiplier effects linked to local farms and local food networks.
- 2.4. Increasing road-based logistics is also contrary to other policies in '*Places for Everyone*', such as Policy JP-C 6 Freight and Logistics (in a modal shift away from road). For the fact road-based logistics is inherently unsustainable, particularly when located in rural areas, we remained opposed to "ix. M6 logistics hub in Wigan, extending into Warrington, St Helens and West Lancashire, providing a major cluster of warehousing and distribution activity along the M6

corridor with easy access to the Port of Liverpool via the M58”, due to the harm to Green Belt purposes.

Policy JP-J2 Employment Sites and Premises

- 2.5. CPRE commissioned an independent economic assessment of the Revised Draft GMSF. The overall quantum of economic development was found to be high. 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.
- 2.6. At the Revised Draft consultation stage CPRE provided independent opinion of two expert economists who evidenced that when looking over the past two decades the need for B2 and B8 has been significantly overestimated. This also has the inflationary impact of pushing upward the housing numbers more than they should be.
- 2.7. Despite this, the amount of office space identified in Policy GM-P 3 Office Development has actually increased over a 17 year time frame, rather than 19 year period. The impacts of home-working and impact of Covid will really need to be understood better, as it is unlikely that things will return as they were, but a ‘new normal’ of people working more flexibly is much more likely.
- 2.8. A YouGov survey published in April 2021 showed that 57% of British workers wanted to be able to work from home after the pandemic. This figure was made up of 37% who said they wanted to work from home some of the time and 20% saying they wanted to work from home full time. Only one in three workers (37%) said they wanted to continue never working from home. (<https://yougov.co.uk/topics/economy/articles-reports/2021/04/13/one-five-want-work-home-full-time-after-pandemic>).
- 2.9. The YouGov survey ties in with another one. Research from the Chartered Institute of Personnel and Development (CIPD) published in July 2021 shows that, post pandemic, 37% are expected to work from home on a regular basis and some 22% would work from home all of the time, compared to 9% pre-pandemic (<https://www.cipd.co.uk/about/media/press/home-working-increases>). So, nearly a quarter of the workforce is not going to be commuting at all and over a third of the workforce is only going to be commuting occasionally.
- 2.10. We therefore urge for less office development over the lifetime of the GMSF. There has been an exodus from commercial office space.

Policy JP-J 3 Office Development

- 2.11. The amount of office space identified in ‘Places for Everyone’ Policy JP-J 3 Office Development has actually increased by 258,058 sqm since the GMSF Regulation 18 stage consultation. CPRE queries this figure as now Stockport’s office requirement is excluded (it had 92,651 sqm allocations) and the plan period has reduced from 2018 to 2037 to 2021-37 and we would have expected a reduction over the 17 year time frame, rather than 19 year period.

- 2.12. We note that estimated completions in 2021 amount to 146, 718 sqm and this should mean there is a reduction in the overall requirement for office space.
- 2.13. Many companies are expecting to encourage a reduction of office space with meeting room rentals and hot-desking to reduce overheads. There is considered to be a future exodus from commercial office space. This trend was occurring pre-pandemic, and the impacts of Covid have accelerated it with people preferring to work from home fulltime and parttime. The impacts of home-working and impact of Covid will really need to be understood better, as it is unlikely that things will return as they were, but a 'new normal' of people working more flexibly is much more likely. We therefore urge for less office development over the lifetime of the '*Places for Everyone*' spatial plan.
- 2.14. We do commend those local authorities Bolton, Manchester, Rochdale, Tameside and Trafford that have identified more brownfield land for office land uses.
- 2.15. Regrettably Rochdale appears to have reduced the quantum of office space focus on brownfield down to 19% and have increased its focus in the Green Belt. We query the need for the increase, as it is considered unnecessary.

Policy JP-J 4 Industry and Warehousing Development

- 2.16. At least 3,330,000 sqm of new, accessible, industrial and warehousing floorspace will be provided in the Plan area over the period 2021-2037. CPRE believes this figure is too high and much of it is focused in the Green Belt causing a significant extent of Green Belt harm, with a further 480,000 sqm has been identified which is likely to be delivered after 2037.
- 2.17. The '*Places for Everyone*' spatial plan identifies industry and warehousing existing land supply including that which is brownfield land and across all 9 local planning authorities the quantity has reduced, and identifies a total of 1,171,653 sqm. The GMSF Regulation 18 document identified a total of 1,734,703 sqm of brownfield land. Stockport's total was only 63,549 sqm, so it is surprising to see such a significant reduction. CPRE thinks the requirements identified need to be tested to check for soundness and reductions made as appropriate as the Green Belt focus is contrary to claims the '*Places for Everyone*' has a brownfield preference, and contrary to NPPF Sections 11 making effective use of land and 13 Protecting Green Belt land.

Places for Homes

- 2.18. Despite '*Places for Everyone*' focusing investment in the north of the sub-region, Figure 7.1 shows a focus of housing supply in the area of Trafford and north Bolton where a lot of permissions already exist in the planning pipeline.
- 2.19. CPRE considers the **Policy JP-J 1 Scale, Distribution and Phasing of New Housing Development**, which has an overall 164,881 net additional dwellings over the period 2020-37, or an annual average of around 10,305 to be an improvement on previous figures, however due to falling

population trends and Brexit we think there will be a lower growth rate for population and associated household formation rates.

Standard Method 2020

- 2.20. CPRE was pleased that the Government listened to the public and revised the Standard Method 2020, as the earlier 'mutant algorithm' was flawed. It is helpful the Government is focusing more on building the homes we need in cities and on previously used land. The examination will need to consider this update. These are minimum requirements for the authorities.
- 2.21. Unfortunately, the Standard Method 2020 is based on Office of National Statistic 2014 population data (based on high growth rates). The Government is pursuing an unjustified 300,000 dwellings per annum, despite more up to date population data showing a need for less than 200,000. We keep asking why, as it leads to unnecessary loss of land in the countryside for development, including in Green Belt, despite the Government's promises to protect it.
- 2.22. Chris Pincher, Minister for Housing has declared a temporary softening of the otherwise stringent Housing Delivery Test in recognition that not enough homes are being completed due to the pandemic. Saddling the local planning authorities with unachievable housing numbers sets them up to fail and the societal consequence is development of our greenfields in opposition to the Brownfield preference declared by GMCA.
<https://www.cpre.org.uk/resources/set-up-to-fail-why-housing-targets-based-on-flawed-numbers-threaten-our-countryside/>
- 2.23. CPRE does want enough housing planned, but the focus must be brownfield as greenspace is of high value for current and future generations. The pandemic showed the importance of daily exercise, in local greenspace. Greater Manchester must protect its environmental assets to support an improvement in the health and well-being of its people.
- 2.24. Also, we would highlight the point we make in our paragraph 4.2 in this submission where we draw attention (under the heading of 'Strategy') to the new permitted development rights and changes in the uses orders which allow for commercial properties, including shops, to be repurposed into residential accommodation without planning permission. This will make a significant difference to the numbers of housing units that will be delivered in city and town centres, a factor which must be recognised in the final version of the Greater Manchester Plan.
- 2.25. We note the phased approach to housing delivery, which increases over time. This is a helpful approach; local planning authorities are less likely to fail against the Government's performance metric and it will be less easy to find the spatial plan out of date.
- 2.26. We have also shown Government that the developer viability focus of the NPPF promotes unnecessary development of greenfield land, in advance of previously developed land in urban places, by rendering alternative options "unsuitable" (as defined by deliverable and developable in the NPPF Glossary).

Policy JP-H 2 Affordability of New Housing

- 2.27. We understand the NPPF focus on viability has stopped affordable homes being delivered as developers renege out of agreed contributions due to NPPF loopholes. We will continue to lobby Government for improvement of national policy. Sadly, these problem of the NPPF are outside the scope of the *'Places for Everyone'* examination.
- 2.28. CPRE believes that *'Places for Everyone'* will be unsound if it cannot enable affordable dwellings to come forward at a value that low paid wages can afford. The amount of affordable housing in rural areas is problematic as property prices have risen eleven times more than wages in recent times. Covid is forecast to exacerbate the problem. Recent performance on delivery of affordable housing across Greater Manchester is low, but as said we recognise this is largely as a result of the NPPF's developer viability focus. We are hopeful that, outside of Manchester city centre, the new permitted development rights and change of uses order allowing commercial premises such as shops to be changed over to residential use without planning permissions will deliver more affordable housing units. However, we would be happier if each commercial centre was required to have a master plan to ensure that the result of the permitted development rights was not inappropriate and haphazard housing delivery.
- 2.29. CPRE believes delivery of 50,000 additional affordable homes with at least 60% social rent mirrors housing needs across the nine local authority areas.

Policy JP-H 3 Type, Size and Design of New Housing

- 2.30. The Policy is for new housing to be designed to comply with the nationally described space standards, and be built to the 'accessible and adaptable' standard in Part M4(2) of the Building Regulations, which is a sound approach. That said, it was obviously written before the government produced its coding process and guidance notes for a Model Design Code. Local planning authorities are now being required to each produce their own design code. We welcome this move. It would be helpful, therefore, if this policy could include a commitment for each local authority to produce a design code before the end of 2022.

Policy JP-H 4 Density of New Housing

- 2.31. In city and town centre locations housing density should be optimised to deliver a significant number of homes and make the most efficient use of Greater Manchester's significant amount of brownfield land. We are concerned that there is scope for lower densities to be accepted and the wording of the policy should be written in a way that does not lead to low density developments in central locations. That said, we also have concerns that the table in this policy may lead to over-development in some areas distant from centres where it is inappropriate. We would suggest that the table needs to be expanded and accompanied by a map for each local authority area to ensure that the right density is delivered in the right places.

3. Greener Places

Policy JP-G 1 Valuing Important Landscapes

- 3.1. Our landscapes are incredibly important to our distinct sense of place based on geographic, historical and cultural factors. Our rural landscapes are under threat from built intrusions. An intrinsic characteristic is tranquillity and this is a characteristic that should be protected by *'Places for Everyone'* policy.
- 3.2. It is right that when planning for new development the transitional areas including surrounding countryside is noted of particular importance and that opportunities to improve the condition of the landscape with reference to enhancement of biodiversity and geodiversity is mentioned. It is important when new development is planned that regard is given to the Greater Manchester Landscape Character and Sensitivity Assessment.

Policy JP-G 2 Green Infrastructure Network

- 3.3. As mentioned above CPRE recommends that a reference to the importance of hedgerows, as set out by the 1977 Hedgerow Regulations is highlighted in this policy as there is a statutory duty on local planning authorities to protect important hedgerows.
- 3.4. CPRE recently published research undertaken independently with the Organic Research Centre www.cpre.org.uk/ORC21. This demonstrates that one of the best ways to simultaneously tackle the climate crisis, boost nature and grow our economy is by restoring and increasing the UK's hedgerow network. Hedgerows are a haven for nature, they remove carbon from the atmosphere and support sustainable local economies, but shockingly we have lost 50% of our hedgerows since the Second World War and they are still in decline.
- 3.5. Figure 8.2 identifies areas of Priority Green Infrastructure. We do not understand how the Policy JP-Strat 11 New Carrington to accommodate a new relief road, 4,300 houses and 350,000sq.m of employment floorspace can be found sound as there is a clear conflict with the aims of protecting priority habitat of significance for the benefit of future generations.

Policy JP-G 3 River Valleys and Waterways

- 3.6. CPRE acknowledges that river valleys and waterways are a vital part of a Nature Recovery Network and play a major contribution to local identity, quality of life and the natural environment. It is therefore important the *'Places for Everyone'* spatial strategy has a policy setting out how they should be protected and improved in the future.

Policy JP-G 4 Lowland Wetlands and Mosslands

- 3.7. We are pleased to note the contribution of hedgerows in point 4 and they should be referred to elsewhere in *'Places for Everyone'*.
- 3.8. Paragraph 8.30 states that lowland bog areas will only be developed where they are shown to be of limited ecological value, which CPRE supports. However, this brings into question why is New Carrington identified for such major development, as it is of significantly high ecological value and

it is therefore illogical as the area is highly unsustainable for development. Policy JP-Strat 11 New Carrington is contrary to ambitions of protecting and enhancing lowland wetlands and mosslands.

Policy JP-G 5 Uplands

- 3.9. In CPRE's opinion this policy will support the retention of upland areas from unsuitable development. The design of any development deemed acceptable in principle should integrate well into the landscape and be sensitive to local materials and building styles to retain local distinctiveness. More detail of mitigation should be included in the policy wording and explanatory text.
- 3.10. More people could enjoy access in upland areas if balanced with the need to protect areas of blanket bog and other designated biodiversity.

Policy JP-G 6 Urban Green Space

- 3.11. As stated in the consultation on the Revised Draft GMSF, we applaud this policy as all people have the right to accessible urban green space, as has been increasingly recognised during the pandemic. The provision of quality urban green space supports good health and well being and enhances biodiversity. CPRE recommends the wording of the policy is strengthened as it says "in balance with other circumstances", which could unintentionally promote its development.

Policy JP-G 7 Trees and Woodland

- 3.12. CPRE supports the Greater Manchester Tree and Woodland Strategy. Mature trees should be retained wherever possible due to their value to biodiversity and pollution filtering characteristics. As previously mentioned, hedgerows are of value and should be mentioned in this policy.

Policy JP-G 8 Standards for a Greener Greater Manchester

- 3.13. We advise the removal of the text 'wherever possible' as this can lead to the unintended consequence of encouraging developers to avoid delivery, and the NPPF is already too developer viability focused leading to a deficiency in developer contributions.

Policy JP-G 9 A Net Enhancement of Biodiversity and Geodiversity

- 3.14. We recommend that the comments of the Lancashire and Cheshire Wildlife Trust are considered by the examination. It has specialist ecology and local knowledge to bring to the process that is of immense value.
- 3.15. In theory we welcome the concept of Biodiversity Net Gain. Defra has just published latest Metric 3.0 and the policy should refer to latest calculations to ensure good practice. However, since the introduction of the Government's 25-Year Environment Plan there continues to be widespread ecological collapse and natural capital assets have degraded. The Environment Bill is currently making its way through Parliament. CPRE is concerned that post-Brexit the Government needs to honour commitments that the standard of environmental regulation will not be lowered. Reference to Nature Recovery Strategies would be useful in the policy. The

policy should read “achieve a measurable net gain in biodiversity of at least 10% in accordance with national best practice”. Arrangements for the long-term monitoring of developer mitigations and compensations need to be transparent and accountable.

- 3.16. CPRE welcomes the requirement in clause e) that development affecting “best and most versatile” agricultural land should be supported by appropriate evidence. We are concerned that Government policy as expressed in the NPPF for protecting high grade farmland is weak. The development of Best and Most Versatile (Grade 1) should in our view be prohibited as it is a national asset. Grade 2 and 3a should not be easily allowed for development either. *‘Places for Everyone’* should seek to protect BMV land wherever possible and guard against it being harmed. The *‘Places for Everyone’* spatial plan should protect the ability of future generations to feed itself by protecting and enhancing high grade farmland.

Policy JP-G 10 The Greater Manchester Green Belt

- 3.17. CPRE is opposed to Green Belt loss and it recommends this policy is in line with the NPPF, July 2021 Section 13 Protecting Green Belt land. NPPF Paras 137 reiterates the Government commitment to Green Belt and its aim of keeping land permanently open. Para 138 sets out the five purposes:
- (a) to check the unrestricted sprawl of large built-up areas;
 - (b) to prevent neighbouring towns merging into one another;
 - (c) to assist in safeguarding the countryside from encroachment;
 - (d) to preserve the setting and special character of historic towns; and
 - (e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.
- 3.18. Para 139 states “the general extent of Green Belts are already established”, and Para 140 goes on to state “once established boundaries should only be altered in exceptional circumstances”.
- 3.19. CPRE considers the exceptional circumstances required are not justified. As already stated, the quantum of development identified is too high. We also think there may be alternative land as there are additional brownfield sites that would be available over the life of the spatial plan. This accepts the Government’s rather narrow definition of what constitutes ‘suitable’ land on local planning authorities’ brownfield registers. With targeted investment and coordinated action, land currently considered ‘unsuitable’ could be made ‘suitable’ and for the delivery of development, which would address problems associated with brownfield land lying wasted.
- 3.20. Green Belt land designation is a crucially important planning tool. It has successfully maintained a valuable ring of open land around the city region. Green Belt is located exactly where it needs to be near to millions of people who live in the city region. If it wasn’t for Green Belt designation the open land would have been long since developed. It is no surprise that when you look at the areas of high natural capital value it strongly overlaps with Green Belt designation. The whole point of Green Belt is its permanence. Open green land is important for the health and well-being of those who live, work and visit Greater Manchester.
- 3.21. This policy is worded in such a way that it appears to ensure Green Belt land is given strong protection, and enhancement. It also should support Green Belt land being made more

accessible to the public for leisure and recreation in a way that supports openness. However, the policy is tied to the Policies Map. This all too clearly illustrates the amount of land which it is still proposed should be removed from Green Belt (1,754 hectares, ie. Picture C.2 '*Places for Everyone*' Policies Map on page 466 see the areas marked with red diagonal lines). In addition, the 24-hectare site at Horwich Golf Club in Bolton needs to be included as Green Belt loss.

- 3.22. CPRE acknowledges that the amount of Green Belt land required for this Plan has been substantially reduced since its first iteration, but we think Green Belt loss can be significantly reduced in the light of the new 'normal'. CPRE believes the amount of proposed Green Belt removal is still excessive, given a much more pessimistic economic reality due to Brexit and Covid, necessitating a reduced requirement for employment land and a need to revise housing numbers downwards as well. Requirements should be based on revised projections grounded in latest population data as this is best practice. Consequently, whilst we can commend the wording in this policy which offers reassurances about remaining Green Belt, we have no option but to find this policy unsound.

Policy JP- G 11 Safeguarded Land

- 3.23. In CPRE's opinion the land adjacent to the proposed HS2 Manchester Airport Station should not be safeguarded. As stated above, we feel the case for HS2 is not clear, particularly given the adverse environmental impacts. If HS2 were justified, its stations should link key centres of population not uninhabited rural places. It is our view that the case for HS2 needs to be revisited due to spiralling costs and reality of reduced benefits such as journey times. We contend that the environmental harms outweigh the ever reducing benefit due to soaring costs and considerable environmental damage, including loss of priority habitats and the loss of ancient and veteran woodland.

4. Places for People

Policy JP-P 1 Sustainable Places

- 4.1. Broadly, CPRE believes the policy to be sound. Development should be distinctive, and we are pleased the policy requires new development in 1.A to respond to the natural environment, 1.B respect heritage and 1.C respect character. Rural character should be referred to in particular.
- 4.2. We think under point 7 best and most versatile farmland grade 1 and 2 should be specified for retention, and under 16 that hedgerows should be cited for retention.

Policy JP-P 2 Heritage

- 4.3. Broadly, CPRE believes the policy to be sound. Our rural heritage should be protected and enhanced wherever possible as much has been lost in the past three centuries and it is of local

value. Therefore, particular consideration should be given to the countryside in addition to those stated.

Policy JP-P 3 Cultural Facilities

- 4.4. Broadly, CPRE believes the policy to be sound. Our rural culture should also be protected and enhanced in the future and this is an omission from the policy and needs inclusion.

Policy JP-P 4 New Retail and Leisure Uses in Town Centres

- 4.5. Broadly, CPRE believes the policy to be sound. Development should be focused at existing town centres to take pressure of rural areas, which is least sustainable.

Policy JP-P 5 Education, Skills and Knowledge

- 4.6. Broadly, CPRE believes the policy to be sound. There are rural traditional skills that are of value for future generations, therefore CPRE recommends that attention on retaining farming and other countryside education and knowledge is important.

Policy JP-P 6 Health

- 4.7. Broadly, CPRE believes the policy to be sound. The public appreciation of the health and well-being of exercising in local greenspace has increased significantly during the pandemic. Given the levelling up agenda, which has been promised, we would expect all areas to be supported with access to local greenspace and for every effort to be made to reuse brownfield, as there is significant research linking poor health and proximity to vacant and neglected and underused previously developed land.
- 4.8. Also, as stated at Policy JP-Strat 14 A Sustainable and Integrated Transport Network, more road building will further reduce air quality and this does not support JP-P6.

Policy JP-P 7 Sport and Recreation

- 4.9. Broadly, CPRE believes the policy to be sound. We support bullet point 6 as we value our network of paths and other rights of way.
- 4.10. As a matter of importance, the Government has announced that it will no longer respect Rights of Way that are not shown on up to date maps by 2026, even if they have been used by the public previously. We recommend that GMCA, and the constituent local planning authorities across Greater Manchester with the public work collaboratively to identify all paths and ensure they are documented correctly for the benefit of all in the future. For more information, please see here: <https://www.ramblers.org.uk/get-involved/campaign-with-us/dont-lose-your-way-2026.aspx>

5. Connected Places

Policy JP-C 1 Our Integrated Network

- 5.1. Broadly, CPRE believes the policy to be sound. We support the policy in minimising the need to travel. This could be reworded to say “deliver urban concentration to reuse brownfield land as a priority.”
- 5.2. Under point 5 please mention as c. public transport, such as buses.

Policy JP-C 2 Digital Connectivity

- 5.3. Broadly, CPRE believes the policy to be sound, although we discourage the development of digital infrastructure if it harms openness and other purposes of Green Belt or rural landscape amenity. This should be referred to in the policy.

Policy JP-C 3 Public Transport

- 5.4. Broadly, CPRE believes the policy to be sound as we think new development should be based on properly integrated and seamless public transport to halt car dominance and promote more sustainable connectivity between Greater Manchester and other northern conurbations and across Greater Manchester.

Policy JP-C 4 Streets for All

- 5.5. Broadly, CPRE believes the policy to be sound in support of places to be of improved quality and more inclusive. We must reverse the dominance of the private car.

Policy JP-C 5 Walking and Cycling

- 5.6. Broadly, CPRE believes the policy to be sound. Investment in more walking and cycling infrastructure is important, including signage and security so people know where routes are and so people are safe and bikes can be stored safely. There are cycle routes in Greater Manchester that are deemed unsafe due to real and perceived threat of crime, such as Fallowfield Loop.

Policy JP-C 6 Freight and Logistics (in a modal shift away from road)

- 5.7. CPRE believes a modal shift of freight to water and rail is crucial if Greater Manchester is to achieve its carbon-neutral goal. Port Salford is supposed to be based on tri-modal, however the volumes of goods that are transported in this way is unknown. Local people say they have not seen any movement of freight on the water. We would be interested in understanding how much tonnage is currently transported on the water, and in the future what volumes are anticipated as part of this policy, so progress can be monitored. It is believed that new roads would constrain the movement of freight on the water due to bridges being built across and acting to impede services up and down the Manchester Ship Canal.

Policy JP-C 7 Transport Requirements of New Development

- 5.8. CPRE believes a Transport Assessment and Statement should be required by major development applications to manage transport in an integrated way and for monitoring purposes.

6. Site Allocations

- 6.1. Although CPRE welcomes the important site deletions, policy test strengthening, such as a requirement for a master planned approach, reduced extent of Green Belt release, and additional assessments specific to each site if allocated, landscape character and ecological assessments, and inclusion of more active travel routes connecting to greenspace, it finds many allocations unsound, for the following reasons set out below.
- 6.2. **As stated above, CPRE is not satisfied that exceptional circumstances exist to justify the proposed amount of Green Belt release and a number of sites have insurmountable planning considerations that materially affect their suitability to deliver development.**
- 6.3. To spare repetition below, as mentioned previously, CPRE at a previous consultation stage provided evidence of expert economists that considered that the employment needs for B2 and B8 have been significantly overestimated, and now a proper account of the economic downturn impacts of Brexit and Covid need to be better understood. The increase in home working and shopping online is likely to cause a fundamental shift in property market and land use, and it is therefore prudent to take a more precautionary approach.
- 6.4. Similarly, the quantity of housing identified is unnecessary high. This undermines the case that exceptional circumstances exist for the release of Green Belt.
- 6.5. GMCA's stated brownfield preference is in line with NPPF Section 11 Making effective use of land. CPRE applauds this and seek a more comprehensive assessment of brownfield sites. *'Places for Everyone'* must maximise all opportunities for land assembly. CPRE volunteers when undertaking a rudimentary desk-based exercise using a toolkit (now available online) identified a number of brownfield sites that had been missed off the brownfield registers,. For more information: <https://www.cpre.org.uk/discover/brownfield-is-best-our-campaign-history/>
- 6.6. 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 to be easily sacrificed for development. The harm to Green Belt purposes should be avoided, reduced, mitigated, and adequately compensated.
- 6.7. We consider the impacts from large scale induced road-based transport to be contrary to other policies in the Joint Development Plan, particularly concerning sustainable development, net carbon development and air quality. Other nuisances, including noise, vibration, dust and light pollution will occur reducing residential amenity to communities losing their greenspaces.
- 6.8. What is needed are sites that are capable of an integrated multi-modal approach, with a focus on existing towns and cities to make the best use of existing transport infrastructure, particularly rail and bus, and enabling more cycling and walking. The 20-minute neighbourhood concept is low carbon and will support GMCA and the constituent authorities achieve the carbon zero aim by 2038.

- 6.9. The site selection process also generally downplays the value of our environment leading to many of the allocations being unsound. We would have expected sustainability criteria to be more robustly applied to better understand the comparative contribution that sites serve to the purposes of the Green Belt and to eco-system services. The role of sites on nature conservation, farm production due to soils being of high quality, and material factors such as storing carbon, such as the peat and mossland areas. The latter is ever more crucial given the body of evidence on the urgency of response to the climate emergency and ecological collapse. More Green Infrastructure should be forthcoming and as much woodland, trees and hedgerow retained to sustain biodiversity across the 9 local authority areas.
- 6.10. Ultimately, people want the environment to be central to planning considerations not viewed as merely a constraint to developers that can be overcome with insincere off-site mitigation. This dysfunction of the '*Places for Everyone*' document has led to a disconnect between the overarching policies and the land identified for development.
- 6.11. These above-mentioned points apply to all the allocations. More specific site details are set out under each site reference concerning particular harms to the countryside, farmland loss and ecological issues to address.

CROSS-BOUNDARY STRATEGIC ALLOCATIONS

Policy JP Allocation 1.1 Heywood / Pilsworth (Northern Gateway)

CPRE objects to this site allocation.

The harm to Green Belt is extensive with the 640.42 hectare site due to the scale of built incursion proposed at the location with Bury and Rochdale effectively being merged, in both a spatial and visual sense due to urban sprawl and countryside encroachment.

The site is contrary to other policies in the Joint Development Plan, particularly concerning sustainable development, net carbon development and air quality. Other nuisances, including noise, vibration, dust and light pollution will occur reducing residential amenity to communities losing their greenspaces.

There is an absence of a robust preliminary ecological assessment and local people have told us of a variety of important species of flora and fauna, including Brown Hare, Barn Owls, Yellow Wagtail and other farmland birds. Biodiversity Net Gain is in infancy and has yet to be evidenced to work in practice, and since the introduction of the Government's 25-Year Environment Plan there continues to be widespread degradation of natural capital assets. We recommend a precautionary approach.

We note the criteria 3. reference to Bus Rapid Transit Corridor and rail-tram connections connecting east and west, but remain concerned that this is a road-focused development. The reality is that much more motor based traffic will be induced by this proposed allocation, causing significant negative impacts for people living locally.

Policy JP Allocation 1.2 (Simister & Bowlee)

CPRE objects to this site allocation.

The harm to Green Belt purposes has been reduced with the retention of the sliver of Green Belt abutting the M62 motorway, however the harm is substantial at the location with Bury and Rochdale effectively being merged, in both a spatial and visual sense 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 harm from loss of farmland, farm related businesses and loss of residential amenity.

We understand that local people are concerned about Bradley Hall Farm Sites of Biological Importance and the green corridors that connect wildlife beyond it. There are flora and fauna of note including farmland birds.

There are flooding concerns, such as to Whittle Brook that would be exacerbated by development in this location in the future.

Policy JP Allocation 2 Stakehill

CPRE objects to this site allocation.

Although CPRE welcomes the reduced employment requirement of 150,000 sqm at the site, this is at the expense of an increase in dwellings to 1,680. CPRE also supports policy criteria 6. Having regard to views from Tandle Hill Country Park, but in reality, the scale of the development identified with release of a 202.45 hectare site would be cause a major incursion with extensive harm to landscape character and adverse visual impacts due to the urbanising effect.

The local community is strongly opposed to the allocation with a number of well organised walks up Tandle Hill to emphasise the strength of local objection.

CPRE supports the inclusion of bullet point 7 concerning the retention of the strategic area of Green Belt between the A627(M) spur and Thornham Lane to maintain separation between the urban areas of Rochdale and Middleton.

Ecological concerns include the loss of ponds and associated Great Crested Newts. There are links to the existing biodiversity assets and the wider environment, most notably the Rochdale Canal SAC/SSSI.

Policy JP Allocation 3.1 Medipark

CPRE objects to this site allocation.

This is an important greenspace separating Manchester and Trafford and we consider the harm to Green Belt to be significant and insurmountable.

We are concerned at the absence of adequate ecological survey. Enhancement to Fairywell Brook would need to consider connecting corridors. Natural England's Magic Map identifies that

the area could be important for Lapwing. The combined effects of the development in Timperley would need to be fully considered.

Policy JP Allocation 3.2 Timperley Wedge

CPRE objects to this site allocation.

This is a very large site, which would have a significant adverse impact on Green Belt purpose. The proposal relies on extensive new road building, road widening, junction improvements and motorway roundabout improvements at Terminal 2 roundabout.

Previously we commented on the opportunity cost of focusing expansion at Manchester Airport and the impacts on the rest of the conurbation. CPRE believes the airport should not compete with the city centre and town centre locations as it will harm the regeneration ambitions. It will also put pressure for sprawl on Cheshire East and divert investment away from northern areas of Greater Manchester.

The cumulative impacts of recent airport expansion and other large developments on site and in the planning pipeline should be fully investigated. We consider the cumulative Green Belt harms to be harmful to the national designation and harmful to a significant degree to other issues including increase in carbon and other greenhouse gases and pollution harming the health and well-being of the local community and wildlife.

The site performs high value ecological functions and there are concerns relating to harm to ancient woodland, harm to the Green Infrastructure Network and harm to two Sites of Biological Importance (SBI): Ponds at Davenport Green SBI; and Davenport Green Woods SBI. A number of species are protected under the Wildlife and Countryside Act (1981).

CPRE supports a modal shift to rail and therefore investment in strategic rail. However, we have retained an objection to HS2 Phase 2b due to the station location in a rural area protected by Green Belt. We consider connecting core concentrations of population is a more sensible approach, rather than to the airport, which is already served well by tram and rail. We are concerned if HS2 goes to the airport, it would stop short of Manchester City Centre. The cost of the scheme has spiralled and route changes incur great harm to ancient woodland and other environmental assets and when balancing the positives a negative balance is considered. We therefore do not support the land being safeguarded for HS2.

BOLTON

JPA 4: Bewshill Farm

CPRE objects to this site allocation.

The proposal is for road based logistics of which a number of speculative developments have been approved in recent months. The need for such an allocation should be revisited.

The cumulative impacts on Green Belt purpose should be fully considered.

There are ecological concerns at Bewshill Farm due to the existence of farmland birds and the importance for the Greater Manchester Green Infrastructure.

JPA5 Chequerbent North

CPRE objects to this site allocation.

This site involves the loss of grade 3 farmland, and is currently protected by Green Belt.

As previously stated the value of the site to support food and farming is important and the protection and enhancement for future generations food security is a valid consideration.

There is a long planning history at the site and a number of development applications have been refused, for genuine planning reasons.

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

JPA06 West of Wingates

CPRE objects to this site allocation.

A shedscape is being developed in this part of Bolton and the cumulative impacts on Green Belt purpose and landscape character and ecology must be fully considered. There was a recent call-in application allowed for a large logistics development at Wingates.

There are ecological considerations at Four Gates SBI that must be protected and enhanced in the future and the proposed 44,000sqm of employment space will fail to do this.

BURY

Policy JPA 7: (Elton Reservoir):

CPRE objects to this site allocation.

Whilst we note an improvement in the mix of housing to accommodate older residents, generally too many houses are focused on this site, which currently affords a high quality of environment for the local communities who enjoy it. Local residents strongly object to the harm to residential amenity and loss of a valued greenspace, which has an important 'green lung' function.

In terms of ecology there are a number of priority species identified by local people including Skylark, Grey Partridge and Brown Hare, many of which are dependent on the current habitat. Given the scale of ecological degradation and need to support such wildlife, we think they should be saved as a greenspace for biodiversity value.

JPA 9: Walshaw

CPRE objects to this site allocation.

The farmland is located in protected Green Belt and CPRE considers it should remain permanently open. The local benefits afforded, include residential amenity, health and well-being and wildlife habitat.

MANCHESTER

LPA 10: Global Logistics

CPRE objects to this site allocation.

CPRE objects to the focus of employment growth at the Airport based on the detrimental impact on competing for economic activity that is more sustainably located in the existing city centres and town centres.

There would be Green Belt harm. Consideration of cumulative harm is necessary.

The ecological value has not been identified. The allocation would have probable negative impact on Cotterill Clough SSSI, and other nearby Sites of Biological Importance and ancient woodland, which would be difficult to properly mitigate. The land nearby has also been lost to development with harm and loss of ecological assets.

OLDHAM

JPA12: Beal Valley

CPRE objects to this site allocation.

The land is designated as Other Protected Open Land (OPOL) in the Oldham Development Plan Document - Joint Core Strategy and Development Management Policies. The local community benefits from the local greenspace and a desire for the Beal Valley to be maintained as it exists, protected, conserved and enhanced by policy.

Previously, Lancashire Wildlife Trust was concerned about the harm to the Local Wildlife Site (SBI) G14: Shawside and extant Green Infrastructure. CPRE echoed these concerns due to the impacts on the ground-nesting breeding wading bird populations within the SBI. Such species are dependent 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, and it is noted that there is the addition of bullet points in the policy text to strengthen biodiversity requirements.

JPA 14: Broadbent Moss

CPRE objects to this site allocation.

We note the site is designated as Other Protected Open Land (OPOL) and Green Belt in the Oldham Development Plan Document - Joint Core Strategy and Development Management

Policies, however, we understand the land has local benefits in staying unbuilt and serves important Green Belt purposes.

There are ecological issues that are as yet to be fully addressed, including replacement of Green Infrastructure to ensure important ecological features are retained, such as woodland, or where loss is required, mitigated properly.

JPA 15: Chew Brook Vale (Robert Fletchers)

CPRE objects to this site allocation.

Although we note that this development has been significantly reduced in scale and is focused more on the brownfield part of the site, there are still issues of concern relating to the substantial intensification of activity on the site, which could threaten the countryside characteristics of the Dovestone gateway and cause probable harm to the Peak District National Park setting, which due to the rural landscape value, benefits from the highest planning policy protection. CPRE recognises the potential benefits from an educational centre linking Dovestones Reservoir with the RSPB and United Utilities, but we would urge the allocation to be strictly within the curtilage of the previously developed footprint and not incur greenfield development.

JPA 16: Cowlshaw

CPRE objects to this site allocation.

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.

There needs to be more adequate assessment of flora and fauna to understand amphibians, bats and other wildlife, such as known important farmland birds.

JPA 17: Land South of Coal Pit Lane (Ashton Road)

CPRE objects to this site allocation.

The site serves Green Belt purposes and would lead to urban sprawl and future countryside encroachment.

There are ecological considerations that have as yet to be properly considered.

There is important Green Infrastructure including woodland and hedgerows that would be lost if the site was developed.

ROCHDALE

JPA 19: Bamford/Norden

CPRE objects to this site allocation.

There would be unacceptable harm to Green Belt designation.

There are ecological considerations including farmland birds such as Curlew and Skylark, that require large open and undisturbed grassland.

JPA 21: Crimble Mill

CPRE objects to this site allocation.

CPRE would welcome investment to protect the heritage value associated with the Grade II* Listed Crimble Mill, however the proposal incurs unacceptable harm to Green Belt purposes.

There are a number of important Green Belt harm issues to consider.

There are concerns about the harmful impacts from the proposed development to Plumpton Wood Site of Biological Importance (SBI) and Meadowcroft Woods SBI lie partially within the site boundary, and there are issues relating to the ecological corridor of the River Roch.

JPA 22: Land North of Smithy Bridge

CPRE objects to this site allocation.

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 observes harm to Green Belt purpose.

It is understood that the area has benefited from public investment via Countryside Stewardship targeting area for Lapwing, Redshank and Snipe and as an area for upland breeding birds as well as grassland assemblages of farmland birds. The development may harm gains to biodiversity.

JPA 23: Newhey Quarry

CPRE objects to this site allocation.

This is a former quarry that retains a permission for mineral extraction. It is in the Green Belt and retains openness. It is important for green infrastructure and for maintenance, restoration and creation of functional ecological networks.

JPA 24: Roch Valley

CPRE objects to this site allocation.

The site is designated as Protected Open Land.

CPRE is concerned about the landscape and visual impacts arising if the land were developed.

There are important ecological issues that need further assessment.

Policy JPA 27: Trows Farm

CPRE objects to this site allocation.

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

SALFORD

JPA26: Land at Hazelhurst Farm

CPRE objects to this site allocation.

The site performs important Green Belt functions.

There is ecological value relating to 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.

JPA27: East of Boothstown

CPRE objects to this site allocation.

The site performs important Green Belt functions. The development would amount to urban sprawl and lead to countryside encroachment.

The sites provides important local greenspace with woodland. There is also important ecology including Water Vole and bird species reliant on the 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.

JPA28: North of Irlam Station

CPRE objects to this site allocation.

There would be Green Belt harm.

This allocation also conflicts with the England Peat Action Plan, NPPF Para 161 Places for People Policy JP-S 2 Carbon and Energy, para 6 and Policy JP-G 4 Lowland Wetlands and Mosslands, para 2, as it would reduce the amount of peat available for restoration in Greater Manchester.

JPA29: Port Salford Extension

CPRE objects to this site allocation.

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.

There would be extensive harm to the Green Belt at this location, leading to urban sprawl and countryside encroachment.

The site provides an important 'green lung' function at this location and the 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.

As previously articulated, we remain concerned environment is at its capacity already with adverse impact on the health and well-being of its residents. Further development 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.

In terms of ecology the allocation contradicts PFE Policies JP-S 2, JP-G 4 and NPPF Para 161c as it will directly result in a reduction of the amount of peat-based habitat available for restoration in the PFE area.

TAMESIDE

Policy JP Allocation 30 Ashton Moss West

CPRE objects to this site allocation.

CPRE is opposed to Green Belt loss as the site is an important local greenspace providing local people with a needed 'green lung' in proximity to the Air Quality Management Areas to the south and west due to the M60 motorway and A6140, with clear benefits to local health and well-being. 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 and as such it is a national asset that should be conserved for the benefit of future generations and it should not be built.

There is concern over the impact of such a large scale development on the local landscape character.

Active travel routes and public transport routes are needed to improve access to Daisy Nook Countryside Park.

Policy JP Allocation 31 Godley Green Garden Village

CPRE objects to this site allocation.

We think land in the Green Belt should be protected and enhanced for everyone's benefit in the future.

Making effective use of brownfield land is at the heart of CPRE's campaign so green fields are not needlessly bulldozed for development. Where there is not enough suitable brownfield land, we accept sustainable urban extensions may be necessary, and we welcome a master-planned approach.

The climate crisis is the most pressing issue for the environment, so new development should reduce the demand for road-based travel, which increases greenhouse gases and reduces air, water and noise quality due to particulate matter and engine and road traffic. We advocate 20 minute walkable neighbourhoods, with cycleways and more public transport. Improved connectivity to Werneth Low Country Park would benefit the aim of being carbon zero by 2038.

The '*Places for Everyone*' JDP should better protect and enhance the designated Sites of Biological Importance of Werneth Brook and Brookfold Wood.

Policy JP Allocation 32 South of Hyde

CPRE objects to this site allocation.

We think land in the Green Belt should be protected and enhanced for everyone's benefit in the future.

Making effective use of brownfield land is at the heart of CPRE's campaign so green fields are not needlessly bulldozed for development. Where there is not enough suitable brownfield land, we accept sustainable urban extensions may be necessary, and we welcome a master-planned approach.

The climate crisis is the most pressing issue for the environment, so new development should reduce the demand for road-based travel, which increases greenhouse gases and reduces air, water and noise quality due to particulate matter and engine and road traffic. We advocate 20 minute walkable neighbourhoods, with cycleways and more public transport.

Also, we wish there to be active travel routes to connect to the Peak Forrest Canal, Trans Pennine Trail and Werneth Low Country Park.

There are ecological issues and the 'Places for Everyone' JDP should protect and enhance the designated Pole Bank Site of Biological Importance

TRAFFORD

Policy JP Allocation 33 New Carrington

CPRE strongly objects to this site allocation.

This allocation is unsound for a variety of material planning considerations.

There is significant harm to Green Belt policy purpose with release of the 1,153 hectares of land (the largest site in the JDP), including urban sprawl, countryside encroachment, distinct areas would also be merged and regeneration ambitions of brownfield land elsewhere in the sub-region would be thwarted.

The site is important for the sequestration of carbon. CPRE is opposed to the proposal to develop four major roads across a peat moss. Development of peat should not be approved due to the adverse carbon emissions impact and given GMCA and Trafford Councils have declared a climate emergency.

Locally there is concern over health and education facilities being at capacity and not enough provision for such a large-scale development. We are concerned about the impacts of loss of a 'green lung', which has been incredibly important for health and wellbeing during the pandemic. There are already health problems relating to exceedances of air pollution and other nuisances due to noise and light pollution from the Motorway and strategic highway network.

CPRE is supportive of the reuse of previously developed land, but the NPPF is explicit that whilst brownfield, ought to be prioritised for development, this only applies where it does not conflict with other policies. CPRE had supported the principle of redevelopment of the footprint of the former refinery as a brownfield site. However, we note that much of the land relating to the former refinery is recorded by Natural England as Priority Habitat as Open Mosaic Habitat and Habitat of Principal Importance for Conservation in England (HPI) under the NERC Act 2006. According to the Greater Manchester SBI Selection Guidelines, this area of the New Carrington allocation qualifies for consideration for SBI designation under the Ur1 Urban Habitats category: "Any site that supports the UK Biodiversity Priority Habitat Open Mosaic Habitat on Previous Developed Land." Therefore, all areas of the site that incorporate OMH must be excluded from the allocation to comply with PfE policies and the NPPF (policies highlighted above).

The ecology of the area is important with red listed bird species and wildlife that is recognised as endangered that are recorded as breeding and feeding in the New Carrington area. Consequently, CPRE considers that a Biodiversity Net Gain of 10% cannot be delivered due to the important environment assets and related habitat that will be harmed, including Brookheys Covert Site of Special Scientific Interest (SSSI), local Sites of Biological Importance (SBIs) and local nature conservation sites and features including woodland and hedgerows both within and adjacent to the allocation. The site is within the Local Nature Recovery Network for Greater

Manchester. The New Carrington Site is in conflict with the majority of key policies and strategies in *'Places for Everyone'*, and the Government's 25 year Environment and the NPPF. Please refer to the comments of the Wildlife Trust, which we endorse.

There is substantial and sustained local opposition. The local community want the environment to be protected and enhanced in the future and the allocation threatens to result in a negative planning balance with considerable harms associated with the development of this land.

WIGAN

JPA 34: M6 Junction 25

CPRE objects to this site allocation.

There would be Green Belt harm.

This allocation is in the Great Manchester Wetlands Nature Improvement Area (NIA), which is identified in JP-G 2 as a Green Infrastructure Opportunity Area and should not be developed.

This allocation also conflicts with the England Peat Action Plan, NPPF Para 161 Places for People Policy JP-S 2 Carbon and Energy, para 6 and Policy JP-G 4 Lowland Wetlands and Mosslands, para 2, as it would reduce the amount of peat available for restoration in Greater Manchester.

Unfortunately, however, it is understood that the site was already approved for a large scale speculative road based logistics development by a Secretary of State via a Call-in decision.

JPA 35: North of Mosley Common

CPRE objects to this site allocation.

There would be Green Belt harm.

This allocation is in the Great Manchester Wetlands Nature Improvement Area (NIA), which is identified in JP-G 2 as a Green Infrastructure Opportunity Area and should not be developed.

This allocation also conflicts with the England Peat Action Plan, NPPF Para 161 Places for People Policy JP-S 2 Carbon and Energy, para 6 and Policy JP-G 4 Lowland Wetlands and Mosslands, para 2, as it would reduce the amount of peat available for restoration in Greater Manchester.

Development of the deep soils containing peat would be counter the expressed Policy JP-S 2 preventing GM being able to be carbon neutral by 2038.

We are concerned that development at this location will cause harm to the ecology in the area around Honksford Brook and that there are ponds on the sites likely to contain Great Crested Newts.

JPA 36: Pocket Nook

CPRE objects to this site allocation.

This allocation also conflicts with the England Peat Action Plan, NPPF Para 161 Places for People Policy JP-S 2 Carbon and Energy, para 6 and Policy JP-G 4 Lowland Wetlands and Mosslands, para 2, as it would reduce the amount of peat available for restoration in Greater Manchester.

The road infrastructure in Lowton is already struggling and such volume of HGV movements from a development of this scale would cause considerable congestion. It would increase air and noise pollution. This causes health and well-being issues.

As mentioned, CPRE does not support the safeguarded of land for construction of High Speed 2 Rail.

There is a known flood risk at Carr Brook. 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 in addition to Green Belt harm, we consider that this is not a suitable site to be allocated.

JPA 37: West of Gibfield

CPRE objects to this site allocation.

This allocation policy omits to refer to the Great Manchester Wetlands Nature Improvement Area (NIA), which is identified in JP-G 2 as a Green Infrastructure Opportunity Area and the policy states:

There are concerns that the allocation includes a large proportion of Grade A SBI, and we question the soundness of the proposed mitigation on site. It is probable that additional offsite mitigation/compensation would be required to achieve a biodiversity net gain of 10%. If not, the site will not comply with other '*Places for Everyone*' policies, including JP-G 2 and JP-G 9 and NPPF (2021) Paragraphs 174a, 174d, 175, 179a, 179b and 180a.

This allocation also conflicts with the England Peat Action Plan, NPPF Para 161 Places for People Policy JP-S 2 Carbon and Energy, para 6 and Policy JP-G 4 Lowland Wetlands and Mosslands, para 2, as it would reduce the amount of peat available for restoration in Greater Manchester.

The allocations is contrary to '*Places for Everyone*' Policy JP-S 2 Carbon and Energy, para 6; Policy JP-G 4 Lowland Wetlands and Mosslands, para 2 and NPPF Para 161c because it will directly reduce the amount of peat-based habitat available for restoration in the future.

Although CPRE believes the site should not be allocated, without prejudice it notes and welcomes policy text relating to providing a substantive accessible green infrastructure corridor and country park on land remaining in the Green Belt within the allocation, and ensure ongoing arrangement for its maintenance, agreed with the Council.

7. Delivering the Plan

- 7.1. CPRE agrees that it is important to have a robust approach to performance monitoring and the ability to ensure a regular policy review to keep the *'Places for Everyone'* on track in terms of delivery of development and economic, social and environmental gains.

8. Appendix A Replaced District Local Plan Policies

- 8.1. CPRE recommends replaced policies improve the land use across the nine local authority areas to improve economic, social and environmental factors.

9. Appendix B Additions to Green Belt

Bolton GB A02 Horwich Golf Club/Knowles Farm – already allowed for development at appeal

- 9.1. As mentioned above, land identified in Policy Green Belt Addition 2 Horwich Golf Club / Knowles Farm was recently allowed for development of 276 and 150 dwellings. Developer Peel Holdings simply would not take 'No' for an answer and, despite refusal by Bolton Council and by a separate inspector at an earlier appeal, it kept reapplying for consent.
- 9.2. The land subject to the application is the last part of the upland area to remain undeveloped, linking the built-up area of Horwich with the uplands. Because of the attractive rural landscape character Bolton Council intended to have the land designated as new Green Belt in *'Places for Everyone'*.
- 9.3. CPRE considers the application for development should not have been supported as building houses would spoil this remnant of upland area. It hinged on Bolton having an unachievable housing requirement of 776 dwellings per annum, which the house builders have not met in the past 3 years despite considerable land in the housing land supply.
- 9.4. CPRE believes assessing the right housing need figure is essential. We note that if the *'Places for Everyone'* spatial plan had already been adopted, it might have stopped the speculative application from being consented and more effectively protected our upland areas.