



**The Campaign to Protect Rural England (CPRE),
Friends of the Peak District &
The North West Transport Roundtable (NW TAR)
Joint Response to the
Greater Manchester Spatial Framework
STRATEGIC OPTIONS CONSULTATION**

January 2016

INTRODUCTION

The Campaign to Protect Rural England (CPRE), Friends of the Peak District and The North West Transport Roundtable (NW TAR) are delighted to respond to the Greater Manchester Spatial Framework (GMSF) Strategic Options Consultation. We wholeheartedly agree there is a great value in having spatial planning documents of a higher level than Local Plans.

CPRE lobbied in favour of an England-wide spatial strategy and all were strong supporters of the regional planning process in which we were embedded. During the period of regional working, we were very active members of the Social, Environmental and Economic Partners (SEEPs) that were an integral part of all the Regional Assemblies/Leaders' Forums throughout the UK and we served on many sub-groups. We felt the environmental viewpoint was given proper consideration throughout the evolution of the regional plans, and we hope the same is to be true of the GMSF.

The *Natural Capital Group*, Greater Manchester's Local Nature Partnership, has been updated on how the GMSF evidence base and consultation stages have progressed to date. The Natural Environment White Paper 2011, set out the Government's vision for the natural environment, and set up LNPs, recognising that it underpins our economic prosperity, health and wellbeing, with a clear framework for protecting and enhancing the things that nature gives us for free, which are too often taken for granted. In order to best support the sparsely resourced LNP we seek to be engaged as fully as possible in the GMSF as each stage is progressed.

It is essential that the final statutory document is one which rests equally on the three pillars of sustainability – social, economic and environmental issues – and would welcome discussions with Greater Manchester Combined Authority on how to achieve this.

This is a joint submission by:

- **The Campaign to Protect Rural England (CPRE) North West Regional Group,**
- **CPRE Lancashire Branch,**
- **CPRE Cheshire Branch,**
- **Friends of the Peak District, and**
- **North West Transport Roundtable**

The Campaign to Protect Rural England (CPRE) works to protect, promote and enhance our towns, villages and countryside (as well as our cities – London is our largest Branch) to make them better places to live, work and enjoy for now and future generations. As members of the Smart Growth Coalition we want to see as much new infrastructure as possible focused on previously developed land and built to appropriate densities, high quality public transport and public realm improvements - with smart choices delivered as a priority so as to achieve modal shift - and, in addition, better spatial planning that will reduce the need to travel.

Friends of the Peak District (FPD) looks after the Peak District National Park, the Derbyshire High Peak and six parishes in North East Derbyshire (Barlow, Dronfield, Eckington, Holmesfield, Killamarsh and Unstone). The Peak District is the third most visited national park in the world. FLD is a member of The Campaign for National Parks and it also represents CPRE in the Peak District. Where CPRE is referred to in this response it includes FPD.

The North West Transport Roundtable (NW TAR) is an organisation that promotes sustainable transport and sustainable land use and healthy lives. It operates under the auspices of the **Campaign for Better Transport (CfBT)**, formerly Transport 2000 (T2000).

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CONSULTATION RESPONSES

Question 1: Have we identified the scope of the GMSF appropriately?

Answer:

As the consultation document points out, in governmental/devolution terms, a lot has happened since the initiation of the Greater Manchester Spatial Framework (GMSF). Indeed, more agreements have been signed between the government and the Greater Manchester Combined Authority (GMCA) since the consultation was launched. For instance, GMCA has now taken on a raft of health responsibilities. This being the case, GMCA must demonstrate their health credentials by interweaving health throughout the Plan as it evolves – notably in relation to air quality, road safety, active travel and the condition of the public realm. And a health impact assessment must not be left until the final stages.

We welcome the acknowledgement that *“Poor health is a major problem across large parts of Greater Manchester”* (para. 5.31, page 55) and applaud the commitment to close the health inequalities gap and focus on wellbeing (para. 5.32) but find the reference to poor air quality (para. 3.35) inadequate and the promise to tackle it less than credible in view of statements elsewhere about increasing air travel and building more roads. We believe there is a need for a greater recognition that road transport and aviation play a major role in carbon and other harmful emissions (at least a quarter of the total). According to Client Earth, 29,000 deaths a year in the UK are attributable in one way or another to polluted air, many to particulates and/or nitrogen dioxide (NO_x) emissions from both diesel and petrol engines. This being the case, GMCA should make a commitment to only build more highway capacity when all other options have been exhaustively appraised and/or because of safety issues. Modal shift to non-car modes (and a consequent reduction in harmful emissions) will only be achieved by continuing to provide high quality public transport that more people will use more of the time.

People aspire to higher quality of lives and this includes not only good health, education, jobs but also a high quality natural environment. People have a strong connection to nature, for the health and well-being benefits and importance to habitats and wildlife. The opportunity to encourage people to remain in, or move into the conurbation, via access to quality local urban and rural green space ought to be fully recognised. Therefore we recommend protecting and enhancing natural assets, including countryside, is referred to as a stated ambition in paragraph 2.7. Growing the economy and improving the environment is not mutually exclusive.

We have noted the reference to *“low carbon opportunities”* - along with a welcome commitment *“to consider environmental capacity”* (para. 1.27) but looking out for *“low carbon opportunities”* is not the same thing as actively reducing carbon outputs.

Earlier last year, the Supreme Court ruled that the UK government must take action to cut air pollution. This resulted from legal action by Client Earth after the UK breached the limits set for nitrogen dioxide (NO₂) and other pollutants. (That said, Client Earth is taking the government back to the Supreme Court this year because of what it says is the inadequacy of DEFRA’s plans to tackle the pollution problem). At the end of last year some 195 nations (including the UK) agreed in Paris to drastically reduce greenhouse gas emissions and aim for zero net emissions by the end of the century. Such a pledge requires a steep abatement process.

Similarly, we have concerns about exactly how it is proposed the “*need to consider our environmental capacity*” should be addressed. This is seen in the context of an assumption that there will be huge economic growth. The actual paragraph says: “*in order to accommodate the significant levels of development we believe are necessary, we need to consider our environmental capacity and low carbon opportunities*”. (Our underlining). The promise ought to be to assess environmental capacity and then make sound judgements about realistic and sustainable growth levels. All growth must be underpinned by adequate supporting infrastructure to ensure there are not problems of increased floods or traffic congestion.

That said, we would point out that a major “*low carbon opportunity*” is the chance that this planning framework offers to set compulsorily high environmental standards for developments. According to the government’s own statistics, 40% of the UK’s energy consumption and carbon emissions come from the way buildings are lit, heated and used. Inappropriately designed houses in particular are a major source of unnecessary emissions. From this year (2016) all new houses on developments of 10 or more have to be ‘zero carbon’ but the government no longer requires that they meet the code for sustainable homes. However, local authorities can make that demand if they so choose. GMSF should in our view require that all new houses meet a prescribed level. (We suggest level four of the former system).

We are pleased that a full Green Belt assessment is being conducted at the strategic level and that it will address all five Green Belt purposes. This is the most sustainable way to conduct a review. We assume any recommendations will be the subject of a separate consultation. Where robust evidence are judged to constitute ‘special circumstances’ we prefer a managed and planned approach to ensure sustainable urban extensions in most sustainable locations based on good public transport accessibility and adequate investment in supporting infrastructure.

Prioritising brownfield land is not a difficult decision, it is ‘the right decision’ but it does require political consensus and partnership approaches to funding and action. We note the assertion that GM is “*doing much to bring forward brownfield land*” (para. 1.25) but wish to see a thorough and systematic approach to previously developed land that replicates best practice from across Europe and we commend to GMCA CPRE’s ‘*From Wasted Space to Living Spaces*’ report (November 2014) and their ‘*Better Brownfield*’ publication (March 2015) which evolved from it. A sequential approach to land allocation is crucial and so is the use of brownfield targets in the GMSF.

Question 2: What do you think the balance should be between local & strategic issues in the GMSF?

Answer:

In terms of a balanced approach, the GMSF should take as its template the North West Plan, ie. the North West Regional Spatial Strategy, which set the over-arching housing numbers and employment land requirements for each local authority area, but not their location.

Like the RSS, it should determine major spatial matters such as Green Belt, the approach to energy, waste and minerals, the location of the larger strategic employment sites and decisions on major transport infrastructure and, in so doing, it must demonstrate best practice.

Flood risk and river catchment is increasing in priority as scientists envisage more frequent episodes of higher than average rainfall associated with warmer wetter summers and winters. The floods last Christmas 2014 in the Somerset Levels and recent repeated flooding of Cumbria and even more recently over Christmas 2015 and New Year in parts of Lancashire and Greater Manchester are timely

reminders of the consequence of not adequately managing flood defence and other infrastructure. It is also important to ensure there is investment in upstream catchment areas to manage and effectively slow flows of water to avoid future flooding.

The economic agenda should not dominate. It should be just one factor, with environmental and social factors being rated equally in all decision-making and there needs to be an emphasis on a steep climate change abatement programme.

The 'London model' is cited as a successful model of economic growth. What is not fully acknowledged is that London's success is in part due to it being planned as a compact city and the successful application of its design guides and Green Belt policy. This has contributed to higher density (housing, employment, and quality green spaces) development that has supported public transport infrastructure investment. It is the connectivity due to walkable neighbourhoods, The Tube, overland train network and high frequency bus routes that enables London high functioning. If GM wants the same connectivity it must plan for higher density in urban places or the viability of good public transport connections simply won't stack up. Compact urban places are more sustainable too as car journeys and harm to greenfield land is minimised.

Most importantly, the GMSF must have a 'plan, monitor, manage' approach to enable fine tuning to ensure the stated vision is achieved.

Question 3: Do you agree with the Greater Manchester Vision and Ambition?

Answer:

The aim of the 'Vision', to become one of the leading regions in the world, is laudable but it is crucial not to just envisage that in terms of economic growth and being 'connected'. Nor is it adequate to recognise that GM has a rich historic environment (in para. 3.28) but to say nothing of conserving it.

What would be the point achieving huge financial success if significant heritage assets had been lost, if the air quality was so poor as to be causing ill health, if there was a dearth of green lungs/open spaces within the built areas, if development had sprawled into the surrounding Green Belt to such an extent that the prime purposes of Green Belt had been lost, if the adjoining Peak District National Park had been compromised to an unacceptable extent, if the number of surrounding agricultural businesses had been so decimated that very little local food was supplied any longer and if the amount of easily accessible countryside had been severely reduced?

We suggest that the 'Vision' is amended to the following (with our input in bold):

*By 2035, Greater Manchester will be one of the world's **most revered and successful** regions, driving sustainable growth across a thriving North of England **in a way which values its environmental and historic assets**. It will be ever more productive, innovative and creative, known for the excellent quality of life enjoyed by **its** residents who are able to contribute to and benefit from the prosperity that growth brings, **whilst having sufficient open spaces, countryside and fresh air to reap all benefits to the full.***

Similarly, the 'Ambition' lacks any counter-balancing statements, eg. about the careful use of finite resources such as aggregates, minerals and water, using raw materials from sustainable sources, ensuring that no drive for growth will have deleterious impacts on environment capital or health and about being a beacon of environmentally-friendly best practice. More should be said about reduction in demand for energy and waste in the future.

Why is the ambition only to have made a transition to a low carbon economy and not to have reduced carbon emissions in line with local, national and international commitments?

There ought to be a firm statement that Greater Manchester will have made a recognisable contribution to climate change goals by 2035. Para. 3.34 claims: *"Climate change will be a key theme running throughout the GMSF"*. Why, therefore, is it not mentioned in either the 'Vision' or the 'Ambition'?

This is particularly anachronistic because Greater Manchester is a role model for the United Nation's International Strategy for Disaster Reductions (UNISDR's) resilient cities campaign and GMCA, which is committed to a 48% reduction in CO2 emissions between 1990 and 2020, has now signed up to the Compact of Mayors – the world's coalition of city leaders (150 at the last count) – focused on climate change. There clearly needs to be – as the Environment Agency itself has admitted – a complete re-think of the UK's flood defences and also better waterproofing of homes and improved warning systems for extraordinary weather events.

And why is there no ambition to achieve even (say) 75% of development on brownfield land – a realistic target which would be less than was actually being met during the days of the North West Regional Spatial Strategy? We sincerely hope there will be these refinements at the next stage of the GMSF or new development will be unsustainable.

Question 4: Have we identified the key economic issues the GMSF should address?

Answer:

The plan must balance all of the identified priorities. We are pleased to see that rural areas are referred to in paragraph 3.10, as previously mentioned people aspire to live, work and visit high quality countryside so it is important rural places are protected and enhanced by GMSF in the future. The economic growth could only be realistically achieved if development is planned at higher than existing densities to enable more effective use of land, and investment in infrastructure such as public transport.

CPRE believes that transport is a derived demand and not an end in itself. We also believe that spatial planning should be directed towards reducing the need to travel, not encouraging more of it. Consequently, we fundamentally disagree with many of the statements in this section but, that said, we do support making better use of the Manchester Ship Canal and doing everything possible to achieve modal shift away from road travel, notably improving public transport. We would also like to see a statement recognising that soft measures/smart choices can have a positive cumulative effect and that Greater Manchester will be exploring as many avenues as possible to introduce these and reap the benefits.

High Speed 2 rail link is referred to in the GMSF, but we are opposed to the proposed station in countryside protected by Green Belt near Manchester Airport. We believe if there is a robust case for HS2 (and this is still subject to debate), that it should connect cities not rural places, resulting in additional car trips to access the HS2 station. Elsewhere evidence suggests that high speed rail links benefit the capital city more than provincial cities and there is concern over the future viability of the existing train services to London.

Question 5: Have we identified the key place-based issues the GMSF should address?

Answer:

We are pleased to note the reference to ‘Smart Infrastructure’ but would like to see this extended to ‘Smart Growth’. The concept of ‘Smart Growth’ encourages the efficient and sustainable use of land. It promotes development in compact urban areas, which is laid out to encourage walking and cycling and gives everyone easy access to good quality public transport.

‘Smart Growth’ is a holistic approach to development, bringing together the philosophies of urbanism, public transport-oriented development and protection of the countryside, heritage and biodiversity. It is beneficial because it regenerates existing urban areas, making the best use of suitable previously-developed land and existing infrastructure and settlement patterns; it avoids the expensive new infrastructure necessitated by sprawl and it promotes resilient communities by encouraging nature conservation, local food webs and good public services.

Under ‘Environmental Quality’, we are pleased to note some measure of recognition that the natural environment helps to ‘sell’ a city as a place to live but there is nothing about protecting the countryside for its own sake. We recommend full reference in the main GMSF Strategic Options document to the Natural England’s National Character Areas, as currently these important landscape-scale documents are only referred to in Background Paper 4. We believe the Natural England National Character Area information is a massive resource that should fully inform all decision making in the main GMSF.

We also query what is meant by the commitment to “*create a harmonious interaction between landscapes and townscapes*” (our highlighting) – as opposed to a straightforward promise to conserve and enhance important landscapes. This implies an intention to change landscapes significantly. Is this the case?

Question 6: Have we identified the key issues for residents that the GMSF should address?

Answer:

Only some of the key issues to be addressed have been identified. Whilst there is a brief reference in the Greater Manchester Background Paper No. 2 to ‘residence-based employment’ (paras. 4.35-4.38), there is no real attempt to recalculate what it means to have over 12% of employed people in the North West now working from home for all or part of the week – a trend that is rising steeply (Office for National Statistics). This being the case, it is illogical to keep planning for more commuting movements and using out-of-date formulae to calculate the amount of employment land that will be required. Instead, we should be ensuring that more homes are designed with offices, or other live/work space, in them and more communities are self-sufficient. We should also be ensuring the whole population has access to fast broadband services.

The same is true of manufacturing. In Sheffield for example, steel production is high, but recently due to new technologies it utilises less land and labour. The use of technology to reduce the scale of land and labour requirements for employment development ought to be fully considered.

Increasingly people want a healthy work-life balance and want access to leisure and recreation activities in their local environment, including walking and cycling in rural areas.

People want to buy food produced locally to support local food and farming networks. Accessibility to quality natural environments should be prioritised by the GMSF to support the economic development ambitions.

We also want to see the issue of land-banking by developers being tackled as the house building sector is dominated by a small number of large, vertically integrated, private sector firms. The business strategies of these firms are focused around continuing profitability and satisfying the demands for their shareholders, rather than building housing to meet the demands of communities.

This focus on profitability has impacted upon the location, supply levels and build-out rates of new housing. To reduce risk and attempt to generate higher levels of returns, many firms target greenfield land for development, while suitable previously developed, or brownfield, land remains unused. The development of housing is phased and drip fed onto the market to ensure the maximum sales price for each unit, meaning that large schemes take many years to complete. Firms also hold large amounts of land in strategic banks, mainly on unregistered options agreements. This strategy 'locks up' land, preventing competition from firms who may build-out a site more quickly. Developers also trade land in a non-transparent way, often delaying the completion of housing on a site. For more information please see the full report: <http://www.cpre.org.uk/resources/housing-and-planning/housing/item/3976-getting-houses-built>

It is likely that these bigger house builders will be fully represented in each stage of the GMSF and will lobby for the highest number of homes to be brought forward, for their own profit, irrespective of the social and environmental harm. We believe it is important that the Combined Authority ensures Registered Providers and smaller and medium sized developers to ensure quality developments are delivered with adequate infrastructure and genuine commitments for long term maintenance.

Question 7: Do you agree with our overall Strategic Approach and Objectives?

Answer:

No because, as already stated on several occasions, the emphasis is almost entirely economic – with environmental and social (including health) issues merely dealt with in a peremptory manner. There is no real sense of a genuinely balanced approach to the economy, the environment and social issues.

GMCA cannot grow a 'thriving conurbation' on an unhealthy population with a lower than average life expectancy. The health of the environment, underpins a healthy place and population, and therefore the environment must be prioritised for enhancement and protection in order to support short, medium and long term economic development.

Question 8: Are there other key strategic issues we should consider?

Answer:

A key requirement of the National Planning Policy Framework, 2012 (NPPF) is the need for local authorities, when making spatial plans, to work closely with adjoining authorities. They must be able to demonstrate cross-boundary collaboration. It is not apparent that GMCA has been doing this to any significant extent, especially as it concludes in its background papers nos. 1 and 2 that Greater Manchester has very high levels of self-containment. There are analyses of various facts and figures

relating to adjoining authorities and sub-regions but have there been in-depth discussions with them? It is particularly important that there should be as some have very high growth aspirations.

There is quite a bit of cross boundary evidence for High Peak BC in background papers 1-3, but not for housing; there is little cross boundary evidence about the value of the Peak District except in relation to the NCAs. There is no evidence presented in the GMSF of cross boundary working to develop the Options with High Peak Borough Council or with the Peak District National Park Authority (both Tameside and Oldham have boundaries with the National Park). The impacts of options 1-3 on High Peak and the Peak District and their mitigations; also how the Peak District will be valued by the combined Greater Manchester Authority.

We therefore recommend more cross boundary evidence gathering and cooperation between neighbouring authorities to ensure good future planning policy for Greater Manchester's important rural hinterland.

We would also like to see evidence that the GMSF is not attempting to bolster failing town centres for the sake of it. It would be better for there to be a policy of turning over peripheral retail areas which are unlikely to be resuscitated to housing. The more housing there is in town centres, the more likely the remaining retail outlets will succeed.

The supply of water to the conurbation and treatment of waste water is a significant consideration for the conurbation. The NW Regional Spatial Strategy identified less growth than the GMSF options, and then the supply of water was identified as insufficient. Despite the North West receiving lots of rain the storage capacity is limited, so this issue needs to be addressed.

Future flood risk and climate resilience must be properly planned and managed. Retention of green space, tree and hedgerow planting are important in their own right, but also to relieve air pollution and help guard against flooding.

Energy and waste infrastructure to accommodate identified growth must be considered by the GMSF. We recommend demand reduction in the first instance. Then supply of energy from renewable energy projects in suitable environments should be increased. We advocate the waste hierarchy, which first looks to reuse, recycle and only landfills as a last resort.

Question 9: Which option would you prefer and why?

Answer:

Of the options offered, we favour Option 1. We do however question the base figures and do not agree with the employment land calculations for the reason given in response to question 6.

CPRE has major issues with the way the housing and employment land figures have been interpreted and cannot support the higher levels of growth proposed in Options 2 and 3. According to the NPPF and the online Planning Practice Guidance for calculating objectively assessed need (OAN) for employment and housing when identifying land provision targets authorities must rely on robust and proportionate evidence, and therefore only future scenarios that could be reasonably expected to occur can be planned for. This is not the case for Options 2 and 3. There has to be a much greater degree of realism about what is achievable.

CPRE new research found that housing assessments produced by local authorities (SHMAs) are frequently inaccurate, artificially bloated and unreliable. The housing figures produced by SHMAs are

not being balanced with sensible planning for infrastructure, consideration of environmental constraints, and realistic assessments of what housebuilders will be able to deliver. For further evidence visit the full document: <http://www.cpre.org.uk/resources/housing-and-planning/housing/item/4158-set-up-to-fail-why-housing-targets-based-on-flawed-numbers-threaten-our-countryside>.

Options 2 and 3 are completely unsustainable. The infrastructure would not cope with such high levels of growth and the environmental capacity is simply not there. The raw materials (bricks) and labour do not exist for such levels of growth and the development industry has never yet met such housebuilding figures.

We do not agree with the statement that Option 1 would risk Greater Manchester falling behind the rest of the UK. It is currently growing at roughly the same rate as Yorkshire & Humber Region and the East Midlands but its outlook is more promising. Option 1 is simply the only realistic aspiration. It is much less environmentally destructive than Options 2 and 3.

We believe there is a lot of double-counting by adjoining authorities in respect of housing needs and employment land. Cheshire East, for instance, which is currently going through a difficult examination in public into the Local Plan, is going for a very high growth strategy based on its claim that the economy will grow by 0.7% every year without fail for 20 years.

We have employed an independent expert demographer to consider the Objectively Assessed Need calculation of authorities elsewhere in the North West who found that the proposed housing figures were actually 'double' what they needed to be. This was for a wide range of factors including OAN 'policy off' (consideration of figures without environmental protections being applied in accordance with the NPPF and Planning Practice Guidance), slowdown in migration from overseas and neighbouring authorities, household formation rates and inaccurate assumptions about unattributed population change. It is quite possible the same is true of the GM figures.

We contend that there is no necessity to start to encroach on Green Belt. Greater Manchester has more brownfield land than any other part of the UK and, on its own admission, it has 12,000 homes that have been empty for several months. The government's ambition is for 90% of brownfield land suitable for housing to have planning permission by 2020. The government this month has also released £6million to boost housing development on brownfield land. This prompts the question, how much of Greater Manchester's brownfield land could be made available for building houses on within the next four years and how much could be made available for the remaining period of the Plan?

Option 1 will ensure a similar level of dwellings per annum than was achieved in the period 2004-2014.

Question 10: Are there any other growth options that you think we should consider?

Answer:

CPRE would favour a figure between Option 1 and the North West Regional Spatial Strategy figure for the years up to 2021. As the population and migration figures are subject to change, there should be regular reviews, in line with Government requirements.

The North West Regional Spatial Strategy figures were arrived at after exhaustive analysis. Whilst we appreciate they are not based on the latest known population figures, the fact of the matter is that these build rates are not being met. So what is the likelihood that anything higher would be?

For reference, here are the housing figures from the last North West Regional Spatial Strategy:

Taken from Fig. 7.1 of North West Plan – Distribution of Regional Housing Provision 2003-2021

Sub-Regional Area	Local Authority	Total Housing Provision 2003-2021 (Net of clearance replacement)	Annual Average Rates of Housing Provision	Indicative target proportion of housing to use brownfield land and buildings
Manchester & Salford	Manchester	63,000	3,500	At least 90%
	Salford	28,800	1,600	At least 90%
Pennine Manchester	Oldham	5,200	289	At least 80%
	Rochdale	7,200	400	At least 80%
	Tameside	13,500	750	At least 80%
Southern Manchester	Stockport	8,100	450	At least 80%
	Trafford	10,400	578	At least 80%
Northern Manchester	Bolton	10,400	578	At least 80%
	Bury	9,000	500	At least 80%
	Wigan	17,600	978	At least 80%
Total RSS figure for Greater Manchester	AGMA area	173,200	9,623	Average: 82%
TOTAL RSS FIGURE FOR NORTH WEST = (for reference)	All LAs in NW	416,000	23,111	At least 70%

N.B. The total annual build rate for the whole of Greater Manchester in the RSS was 9,623, a rate which is not currently being met, and the total annual build rate for the entire region was 23,111. It should be noted that Option 1 represents 7,300 pa, Option 2 represents 10,350 pa and Option 3 in this GMSF consultation represents 16,000 net additional dwellings pa, well over 50% more than RSS.

Question 11: Are there any other advantages or disadvantages of each option that should be highlighted?

Answer:

To be judged sound, a local plan has to comply with the five-year housing land supply (5YHLS) rule (NPPF, paragraph 47 & qualifying Note 11, and paragraph 49). The Housing Requirement, which is based on the Objectively Assessed Need (OAN) under the condition 'policy on' which includes a policy restriction stage. If the GMSF is not based on the two-step procedure, it cannot be found legally compliant or sound.

We agree that GM is relatively self-contained, and that the uncertainty of demographic forecasting increases when looking at smaller geographies, and therefore it is more sensible to look at the GM conurbation as a whole.

We would want existing planning and environmental protections to be maintained. Higher density development, and reuse of windfall sites and other previously used land should accommodate identified growth.

Furthermore, during the examination in public into the last North West Regional Spatial Strategy, the Environment Agency expressed grave concerns to the panel of planning inspectors sitting in judgement about being able to supply sufficient water to and get waste away from the numbers of houses that were being proposed. Those numbers were much lower than are currently being proposed in the more ambitious Option 2 and Option 3. It is unreasonable for the GMCA to plan for an unrealistic scale and timeframe of development. The need is over-estimated, deliverability is flawed due to the lack of capacity and timeframe for growth. It appears to us that all sense of realism is being lost. Options 2 & 3 are particularly unsustainable.

Question 12: Are there any other important constraints and opportunities that we should take into account when identifying and assessing new sites for housing and employment floorspace?

Answer:

Since Manchester and Greater Manchester's origins stem from before the Bronze Age and Roman fortifications by the River Medlock it surely must be acknowledged that it has developed over 2,000 years. It is in our opinion completely fantasy to imagine the conurbation could double the number of dwellings in just 45 years as proposed by Option 3. Options 2 and Option 1 are not much less over ambitious.

As referenced in response to question 6, the formulae for employment land is seriously out-dated. We suspect that the scenario is too ambitious and based on stronger market conditions than is probable over the plan period. Whilst writing our response George Osborne, the Chancellor, has warned of economic risks that the UK economy faces over the next 12 months, due to tensions in the Middle East, slowing growth in China, low prices for commodities such as oil and copper are all weighing on global confidence.

Also too little account is given to the ONS figures that, in the North West, over 12% of people in employment now work from home for all or part of each week and the figures are rising all the time.

CPRE is supportive of the improvement in GMs socio-economic performance, but it must also enable improvement in GM environmental performance. The strategic plan has to be balanced.

Question 13: Do you think that any of the identified constraints and opportunities more important than others?**Answer:**

The most important opportunity is to protect and enhance the countryside and ensure for quality green space in built urban environments.

The most important constraint of all is poor air quality. Our health relies on clean air, free of harmful toxins, to breathe for good health and longer life expectancy.

Given the recent flooding in Central Manchester, Rochdale and Bury, the existence of flood plains is undoubtedly also a high priority constraint, to properly manage flood risk as the consequence is significantly damaging from an economic, social and environmental point of view.

Question 14: Having regard to the identified or new constraints and opportunities, are there any particular sites or locations that you think would be suitable for providing new housing or employment floorspace?**Answer:**

We want to see all brownfield land in GM developed for housing, employment and quality green spaces. A starting point for the call for sites is the National Land Use Database and identified 'windfall' sites in each local authority area. It is more sustainable to reuse such wasted land resources than bulldozing green fields with harmful environmental impacts. See latest NLUD data for Greater Manchester authorities shown in the table below.

	Land Type					Suitability for housing			
	A - PDL now vacant	B - Vacant buildings	C - Derelict land and buildings	D - PDL in use & allocated or with permission	Total	Yes	No	Don't Know	Total
Bolton	19.34	12.28	48.35	98.22	178.18	72.05	60.92	45.21	178.18
Bury	112.65	23.97	97.49	61.03	295.13	81.95	209.70	3.48	295.13
Manchester	153.39	72.46	76.50	167.81	470.16	371.42	97.00	1.75	470.16
Oldham	59.39	6.78	12.76	183.22	262.15	121.80	124.10	16.25	262.15
Rochdale	50.23	35.88	2.97	87.09	176.17	145.97	7.42	22.78	176.17
Salford	238.80	14.50	146.45	80.82	480.57	251.21	198.26	31.10	480.57
Tameside	30.77	28.50	105.07	36.90	201.24	74.19	82.78	44.26	201.24
Wigan	235.73	5.40	377.48	39.10	657.71	190.68	467.03		657.71
Stockport	32.25	11.15	53.43	21.07	117.90	34.59	83.32		117.90
Trafford	68.29	0.50	13.20	48.51	130.50	33.30	42.77	54.43	130.50
GM Total	1000.84	211.42	933.69	823.76	2969.72	1377.16	1373.30	219.26	2969.72

Please refer to our answer to question 8. We believe that, as retail patterns have changed so dramatically due to the Internet, there is no point in trying to artificially keep alive retail centres which

are bigger than they need to be. There should be a review of all retail centres to establish where there are peripheral areas which could be changed over to housing. Similarly, where there are failing out-of-town centres, they should be assessed for conversion to housing.

Question 15: If new housing needs to be provided outside the existing urban area do you have a preference for new settlements, a small number of major urban extensions or a large number of smaller urban extensions?

Answer

The question is too simplistic. Where new development should go should be partly governed by a comprehensive and up-to-date Strategic Housing Market Assessment and Strategic Housing Land Availability Assessment and needs to be guided by a policy of sequential land use. The latter needs to ensure that important landscapes are last to be targeted, along with land which has special environmental and planning designations.

Where the scale of development cannot be accommodated in the existing settlement boundaries CPRE advocates planned urban extensions in locations with existing infrastructure capacity, and locations with least adverse impact on Best and Most Versatile grade agricultural land and landscapes or habitat protected by planning and environmental protections such as Areas of Outstanding Natural Beauty, Green Belt, such as Sites of Special Scientific Interest (SSSI).

CPRE supports new housing and employment development proposals coming forward for the right reasons, in the right places, with adequate supporting infrastructure. We believe new development should be built to a high design standard to enhance the receiving environment and protect existing local character.

Question 16: Do you have any comments about the background papers supporting the growth options?

Answer:

CPRE acknowledges the concerted effort of AGMA and GMCA officers in preparing the evidence base.

Background Paper 1

S34 and para. 5 on page 33 discuss differences between the 2011 census and the ONS data on net inflows and outflows. GM appears to be disagreeing with the ONS population projections, particularly in relation to Manchester and Salford.

There also appears to be a degree of confusion over travel-to-work areas (TTWAs). Whilst the maps on pages 119 and 120 show significantly expanded TTWAs, paras. 7.2 and 7.11 explain that there have been changes in the definitions of TTWAs and therefore it is difficult/ potentially unreliable to use them as a unit of analysis.

It is revealed that 88% of commuters who live in Greater Manchester also work in the sub-region (S18). Consequently a key conclusion of this paper, which is re-stated at the beginning of the

background paper 2, is that Greater Manchester has very high levels of self containment. However, in over 200 pages of data and analysis of in-migration, out-migration, in-commuting, out-commuting, etc. nothing is said in this background paper about home working.

Background Paper 2

Background paper 2 does cursorily tackle 'residence based employment' but it does so in a confusing manner in paras. 4.35 to 4.38 which look at widely varying tables. This is not adequate for such an important and growing phenomenon. However, it is worth noting here that both the Greater Manchester Forecasting Model (GMFM) and Experian predict a continuing decline in manufacturing employment in every district (para. 4.66).

Despite the predictions of a declining manufacturing base, an apparent acceptance of home working as an issue and the continuing improvements in information technology, however, the GMSF seeks to significantly increase office floorspace (S.16). This would seem to be an out-dated reaction to dramatically changing lifestyles.

Para. 3.11 looks forward to presumed benefits occurring around the Manchester HS2 railway station. Based on the evidence of other high speed rail terminals and the areas immediately around them, this assumption probably has some veracity. However, the statement is also made that "benefits should be felt across the sub-region". Evidence for this is not presented and is questionable. Wherever very high speed rail systems have been built around the world, they have always benefitted the capitals – and invariably to the detriment of the regions. GMCA cannot make assumptions on this very important matter.

Similarly, the claims made in para. 3.13 in respect of the Manchester Ship Canal lack foundation. There are no proposals to deepen or widen the Manchester Ship Canal in order for it to handle bigger vessels and therefore cargo coming into the new deep sea facility at Liverpool on the mega size ships will have to be off-loaded there. It is not going to happen that the freight would be transferred to smaller vessels that could negotiate the canal. It would be preferable that much of it was transferred to rail but, sadly, the rail facility is not made use of as it should be.

CPRE has always supported making more use of the Manchester Ship Canal for freight but is realistic about what it is possible to achieve.

Background Paper 3

We agree that GM is relatively self-contained, and that the uncertainty of demographic forecasting increases when looking at smaller geographies, and therefore it is more sensible to look at the GM conurbation as a whole.

We acknowledge that a series of population scenarios have been modelled using Popgroup (CPRE has commissioned expert advice concerning Popgroup software and the magnitude of error range increasing over longer timeframes).

We also note the range of growth outputs over the period 2012-2035 from 241,306 to 563,979, which equates to a proportionate increase of between 8.93% and 20.87%. We would recommend the use of the ONS 2012- based sub-national projections with a total increase in 327,974 or 12%.

When translated into household growth it varies from 180,391 to 345,715 households, a proportionate increase between 15.85% and 30.37%. This then translates into number of dwellings by applying dwelling ratios for each district. Housing growth figures are between 8,526 and 16,719

dwelling per annum (dpa). Historically the average net increase in dwellings was 7,395 dpa. The preferred scenario 8A identifies a net change of 225,639 between 2012-2035, or 9,810 per annum, equating to an increase of 19.20%. In our view this is too high.

The Government's requirement is that, to be judged sound, a local plan has to comply with the five-year housing land supply (5YHLS) rule (NPPF, paragraph 47 & qualifying Note 11, and paragraph 49). Whether or not Green Belt land should be released, and if so how much, is based on the scale of the Housing Requirement, which is in turn based on the Objectively Assessed Need (OAN) for housing being estimated under the condition 'policy on'. There have been Judicial Review rulings which make it clear that the estimation of OAN is a two-stage process, (please refer to the Hunston Ruling); and various Ministerial Statements which have confirmed this two-stage process. If the GMSF is not based on the two-step procedure, it cannot be found legally compliant or sound. We agree that GM is relatively self-contained, and that the uncertainty of demographic forecasting increases when looking at smaller geographies, and therefore it is more sensible to look at the GM conurbation as a whole. We would recommend the use of the ONS 2012- based sub-national projections with a total increase in 327,974 or 12%. But we would want existing planning and environmental protections to be maintained. Higher density development, and reuse of windfall sites and other previously used land should accommodate this level of growth.

CPRE Lancashire employed an independent expert demographer to consider the Objectively Assessed Need calculation of Sefton Local Plan. He concluded that the proposed housing figure was actually 'double' what it should be. This was due to a wide range of factors including OAN 'policy off' (consideration of figures without environmental protections being applied in accordance with the NPPF and Planning Practice Guidance), slowdown in migration (from overseas, neighbouring authorities and internal), lower actual household formation rates and inaccurate assumptions about unattributed population change. It is feasible that the same is true of the GM figures.

Background Paper 4

It is stated that, because minerals and waste are dealt with through the Joint Waste Development Plan Document and the Joint Minerals Development Plan, there is no proposal to explore them as part of the GMSF process (para. 2.3). CPRE disagrees due to the amount of crossover involved. Building infrastructure involves the extraction and transportation of minerals and aggregates and proposals for huge numbers of houses plus significant other developments involve dealing with a very significant amount of waste. Development aspirations have increased hugely since the evidence was collected for the joint waste and minerals plans. These issues all ought to be dealt with in the same spatial plan.