

The Campaign to Protect Rural England response to the
Draft Greater Manchester Spatial Framework of the
Greater Manchester Combined Authority



All Enquiries:
Jackie Copley, Planning Manager
CPRE Lancashire, Greater Manchester and Merseyside
Springfield House, Office No. 2, 41-45 Chapel Brow,
Leyland, Lancashire, PR25 3NH
Tel: 07718070750
jackie.copley@cprelancashire.org.uk

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The Campaign to Protect Rural England

This is a joint response to the consultation on the Draft Greater Manchester Spatial Framework (GMSF) by the North West Regional Group, and Lancashire and Cheshire Branches of the Campaign to Protect Rural England, and Friends of the Peak District (CPRE affiliated) by Jackie Copley, MRTPI, MA who is a Chartered Town and Country Planner with over 20 years in the public, private and community sectors. Hereafter the joint group is referred to as CPRE¹.

CPRE understands this draft GMSF consultation mirrors the requirements of Regulation 18 ('preparation of a local plan') of the Town and Country Planning (Local Planning) (England) Regulations 2012.

Executive Summary

- i. The intention of the Greater Manchester Combined Authority (GMCA) to enhance economic performance and improve the environment as set out in the draft Greater Manchester Spatial Framework (GMSF) through a plan-led approach is generally supported by CPRE and we wholly agree a spatial plan is required to steer where needed new jobs and houses should be located in the future
- ii. But, in short there is a real evidence gap to address in terms of what is the source of all the new people to fill the jobs and homes.
- iii. The jobs and housing projections rely on untenable economic growth assumptions, which are greatly in excess of baseline forecasts. Such a huge scale of over-supply poses significant risks in terms of the ability of the GMSF to be implemented, and provision based on such inflated numbers cannot demonstrate exceptional circumstances for the proposed scale of Green Belt deletions.
- iv. How Oxford Economics arrived at its jobs figures, 4,000,000m² of additional industrial and warehousing employment floorspace, a growth of 40% is quite unclear. The same is true of the projection for 2,450,000m² of new office floorspace. The uplifts appear arbitrary and transparency is needed to understand why it concludes that such a high level is needed over the plan period. Such high figures fail to observe downward past trends in employment premises take-up and technological advances and significant high growth in home working.
- v. An independent expert demographer undertook a Demographic Appraisal of the housing evidence base to inform CPRE's response. Generally the background data used are sound, but there are a number of flaws in the calculations, leading to at least 30,000 more houses being planned than are necessary .
- vi. The starting point for the GMSF OAHN (policy off) should be the ONS/DCLG 2014 based projections as it is the only scenario that can claim to be fully objective. This gives an OAHN (policy off) of 9,423 per annum or 188,462 over the 20-year plan period.
- vii. The Housing Target should be 9,894 dwellings per annum, 197,885 over the 20-year plan period. This includes a 5% buffer and is within the range of past delivery.
- viii. The downward adjustment of the housing target to take account of restricted land is absent. The National Planning Policy Framework Paragraph 14 states Local Plans

¹ CPRE campaigns for a beautiful and living countryside. We work to protect, promote and enhance our towns and countryside to make them better places to live, work and enjoy and to ensure the countryside is protected for future generations.

should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless:

- any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or
- specific policies in this Framework indicate development should be restricted.

Restricted land includes, those policies relating to sites protected under the Birds and Habitats Directives (see paragraph 119) and/or designated as Sites of Special Scientific Interest; land designated as Green Belt, Local Green Space, designated heritage assets; and locations at risk of flooding, among others.

- ix. The GMSF fails to adequately show that the 'duty to co-operate' with adjoining planning authorities has been carried out in the way that the National Planning Policy Framework demands, causing excessive loss of Green Belt in some locations and the sprawling of the Greater Manchester conurbation into adjoining areas, for example Cheshire East, and St Helens.
- x. The GMSF focuses too little quantity of development on brownfield land at only 70% whereas previously 80-90% brownfield targets were being successfully achieved by authorities across Greater Manchester. Any brownfield sites identified of community or ecological value should be identified as such and designated as Local Green Space with public access, so they really do provide a community benefit as opposed to dis-benefit, which is generally the case. CPRE is concerned that the new Brownfield Pilot Registers do not include all brownfield land that could reasonably come forward in the lifetime of the GMSF.
- xi. In combination the above points to evidence that there are not exceptional circumstances for releasing 4,900 hectares of Green Belt land. Such a loss will not enable reduced carbon emissions or improve air quality. We need some analysis of whether an absolute reduction in carbon emissions is possible.
- xii. If a realistic development quantum is being planned, appropriate densities are applied, and all land sources are exhausted only then can it be justified to release designated Green Belt land.
- xiii. Any land released from Green Belt should involve master-planning and there should have been a full Green Belt review which was fully consulted upon prior to the publication of the draft GMSF.
- xiv. The GMSF document is a good step in the right direction, but the next version must be based on more realistic development needs, with targets set for Policies GM 10 to GM 16 relating to green infrastructure to assess future performance. If not, there is a real risk that the GMSF will promote short term unsustainable development. In combination these deficiencies will imperil GMCA's own stated aims and objectives.

We present our case more fully below.

Section 1 Introduction

1. CPRE agrees that the imbalance between the South of England and the North should be addressed and is supportive of the principle of the Northern Powerhouse to transform the fortunes of those in the North. Although it is wary that the Northern Powerhouse initiative appears to be solely economically motivated, when it should be more well-balanced and based on sustainability principles to improve social factors and the natural environment.
2. CPRE heartily endorses the GMCA/AGMA aspiration for Greater Manchester to become as well known for the quality of its environment as for its economic success (paragraph 1.3). CPRE wholly agrees that the future success of Greater Manchester is linked to the quality of its natural environment, as is the health of the people who live in it. It is on this basis alone on which the conurbation can prosper economically - Greater Manchester will not prosper on a poor environment.
3. Green Belt plays makes a significant contribution to the natural environment and its planning designation (National Planning Policy Framework, Paragraph 80) specifies its purpose is to stop distinct places from merging, stop urban sprawl, stop countryside encroachment, to protect the setting of heritage assets and to positively promote urban regeneration; Green Belt also acts as a 'green lung' for the people living in the often densely populated areas of greater Manchester and has ecological importance. These attributes must not be allowed to be undervalued. The loss of 8.2% of Green Belt is significant and will cause environmental harm. CPRE wants to see a reduction in the amount of Green Belt land lost for development, and makes the case that the extent of development predicted in the GMSF is unrealistically high as it is founded on over-high growth assumptions.
4. CPRE advocates strongly that the draft GMSF toolkit should do far more to tackle area disadvantage associated with industrial decline by focusing more determinedly on previously developed sites, commonly referred to as brownfield land. Recent research at Durham University² (2014) evidenced a link between poor health and the incidence of brownfield land. Brownfield urban land is well recognised as a major contributor to the depression of markets. Vacant brownfield sites often exist in a neglected condition, and blight the communities in which they exist. We accept some may have been naturalised and have a positive contribution, but this is not the case for most.
5. The draft GMSF suggests a target of only 70% when in recent times the local authorities across Greater Manchester were expected by the Regional Spatial Strategy to achieve between 80% and 90%. Most of the authorities' planning departments had successfully achieved this high level of brownfield regeneration and the supply of former factory sites and other previously-developed areas has not dried up and continues to come forward, often as 'windfalls'.

² Healthy land? An examination of the area-level association between brownfield land and morbidity and mortality in England by Clare Bambra et al. Wolfson Research Institute for Health and Wellbeing, Durham University. Environment and Planning A, 2014, volume 46, pages 433 - 454.

6. GMCA must do much more to regenerate brownfield land in advance of more countryside land loss. Greenfield development should not be viewed as the easier development option, this is flawed thinking. Research published by the Campaign to Protect Rural England (CPRE) shows that brownfield sites are being developed more than half a year faster than greenfield sites.³ The research undermines claims that brownfield is either too slow or inconvenient to develop in comparison to greenfield. What is more, greenfield development can actually cost the public purse more than brownfield development, due to the scale of additional infrastructure required. It follows on from CPRE research⁴, late 2014, which found nationally that there are enough suitable brownfield sites for at least one million new homes. And, according to a Civitas report based on government figures released in November 2016, it is feasible to meet the government's target of building one million homes by 2020.⁵
7. Devolution represents a real opportunity for Greater Manchester to provide enough new jobs and homes and it must rely on more sustainable travel patterns, more self-contained communities and more, better-designed homes (with integral offices) to accommodate the growth in home working. In doing so, the Combined Authority will improve the health of the natural and built environment and the health of the people of Greater Manchester.

Section 2 Vision & Strategy

8. Greater Manchester is a thriving and vibrant region, so the vision and strategy must ensure in the future it continues to be, and harnesses the value of its existing network of multifunctional green space, whether it be urban, urban fringe or rural. The green infrastructure must be properly planned as it is capable of delivering a wide range of environmental and quality of life benefits for local communities. People need access to quiet local natural green spaces for enjoyment on a daily basis and it is much more sustainable if more food is generated locally. CPRE highlights the value of green infrastructure for good health and well-being, which cannot be over-stated. The draft GMSF must aspire to have the same, or higher, standard, of green infrastructure comparable to other global leading cities. The value of Green Belt to green infrastructure has not been fully articulated by the draft GMSF, nor has the extent of its contribution to food production.
9. The draft GMSF is largely urban focused and CPRE agrees development should be concentrated in existing urban boundaries. However, it is important that the economic value of the rural parts of the conurbation is recognised. If the number of people who live in Greater Manchester is increased, then the surrounding countryside will need to provide more water, and raw materials to sustain the local economy. It makes sense for

³ <http://www.cpre.org.uk/media-centre/latest-news-releases/item/4257-brownfield-sites-developed-six-months-faster-than-greenfield-sites>

⁴ <http://www.cpre.org.uk/media-centre/news-release-archive/item/3784-england-has-space-for-at-least-1-million-homes-on-brownfield-land>

⁵ <http://www.civitas.org.uk/2016/11/15/one-million-homes-by-2020-it-could-be-done-but-it-would-be-a-long-way-short-of-what-is-needed/>

local markets to benefit from local economic growth and for the multiplier effect to be fully felt locally.

10. Sustainable transport investment must be increased so that it is comparable to that invested in London and other global leading cities. Such investment is essential for growth to be based on an extensive, integrated public transport (trams and buses) and an active travel network stretching across Greater Manchester, providing for more reliable and frequent public services to enable people to get to work and play more easily. This would help development at higher densities in central areas and make the GMSF less land hungry. Growth must not be based on ever increasing private motor vehicle travel, as this would defeat the need to reduce the carbon footprint of the conurbation.
11. Should HS2 be developed, CPRE believes that in order to support a modal shift from air travel to rail, the stations must connect populations of cities and not require passengers to travel to stations in remote countryside, particularly not in the Green Belt. Engineering works must reduce the impact of the infrastructure on the environment and tranquillity. The proposed high speeds make HS2 quite unsustainable in terms of noise, energy requirements and the government's national climate change commitments. The case for HS2 has never been adequately made, with its spiralling costs being justified in different ways as the project has evolved. CPRE regrets that more emphasis has not been given by Government to sustainable transport, active travel, soft measures/smart choices and reducing the need to travel.
12. CPRE believes the draft GMSF is most important for planning sustainable development in the future. However development must be planned for the right reasons, in the right places and with the right amount of supporting infrastructure. The draft GMSF should curb piecemeal development that is not properly justified and not part of a holistic and environmentally sound plan. CPRE acknowledges the strategic locations and refers to them individually below.

Section 3 Strategic Locations

City Centre and Policy SL1

13. CPRE supports Policy SL1, although - without sight of the "highway and parking strategy" cannot say that it endorses it.
14. CPRE believes that the draft GMSF should concentrate development in the City Centre and in run-down areas immediately adjoining it, but must importantly acknowledge in Policy SL1 that the City Centre should have increased green space. This element, as well as health and school facilities, is deficient in the City Centre and is much needed to support an urban renaissance. It could in the future be in the form of formal parkland in addition to improved canal and river corridors to support the increasing residential role of the City Centre and allow for building at higher density whilst avoiding any sense of congestion. The GMSF must provide for building upwards in the City Centre to achieve the job and housing numbers that are really needed and which in addition would provide the support necessary for high-quality infrastructure.

15. There is considerable increased hard surfacing proposed in the City Centre and green space would balance new development. People need quiet space in busy places; in addition trees and other vegetation act as dust filters, habitats for birds and other wildlife, and in readily attainable numbers significantly lower urban temperatures. Green space make commutes, lunchtimes, evenings and weekends more enjoyable and can contribute positively to health, well-being and productivity. Furthermore, future visitor events such as 10km runs, cultural festivals and international events would benefit from such parkland, which is enjoyed in cities like in Barcelona, Berlin, Bordeaux, Melbourne, Munich, New York, and Toronto.
16. Without additional green space within the City Centre it is likely that there will be an imbalance in its functioning because arguably people could not plan to live in the City Centre beyond their early twenties, as the City Centre offer would be too narrow in its lifestyle offer. As 10% of all jobs within the sub-region are to be based in the City Centre, CPRE recommends more green space allowance is essential for a more healthy and happy future for a community spanning all stages of life.

Main Town Centres and Policy SL2

17. CPRE supports almost the entirety of Policy SL2 and acknowledges that the main town centres of Greater Manchester are Altrincham, Ashton-under-Lyne, Bolton, Bury, Oldham, Rochdale, Stockport and Wigan. CPRE believes that, after Manchester city centre, these are the places that should be the focus for the provision of new jobs and housing development to take advantage of the public transport connections and accessibility of brownfield sites that exist there. These places must have their local character and distinctiveness reflected in new build design and use of materials as they are developed.
18. Where we digress slightly from the policy is in objective no 4 which we would like to see re-worded as ‘Optimise or **where necessary** rationalise the scale and range of the retail offer ...’, this being a more realistic approach to what is happening in most town centres due to the effects of internet shopping. The reasoned justification for our stance is that it would be more logical in many cases to reduce the size of town centres and turn over failing peripheral retail areas of them to housing - which would then itself help to support the remaining retail units. Such an approach also helps to remove pressure from the urban fringe.
19. To summarise, the GMSF must not cram towns, but must plan new development at higher density with the provision of good quality green spaces to provide breathable and healthier neighbourhoods with outdoor areas for leisure and recreation activity in close proximity to where people live and work. This is hinted at in policy SL2.2, but CPRE recommends the explicit reference to green space and natural characteristics such as trees, vegetation, tranquillity and wildlife. The justification for this is to make sure that, when new development is planned, the natural environment is also enhanced along with the built environment. We want the quality of place to improve to support an increased quality of life for the inhabitants and workers of Greater Manchester. The

GMSF must build upwards in the Main Town Centres to achieve the employment and housing numbers that are really needed.

The Quays and Policy SL3

20. CPRE supports Policy SL3 and looks forward to having sight of and commenting upon the “District local plans, masterplans and strategic frameworks [that] will provide a more detailed strategy for Salford Quays and Trafford Wharfside”.
21. The Quays is an urban renaissance success story for Greater Manchester transforming a centrally located vacant and derelict brownfield site into a cultural hub with Media City attracting major television companies to relocate from London. The much improved canal-side walkways provide important habitats, sustainable travel and leisure function. Much of the Quays success as a visitor destination and attraction to inward investors can be attributed to investment in a dedicated Metrolink provision. We are most supportive of the proposals contained in Policy SL3, particularly that in SL3.2, but again urge explicit reference to increasing the greenery and managing the water quality. CPRE would like to see this model replicated elsewhere to optimise the value that brownfield sites have for a full range of needed land uses.

Airport Gateway and Policy SL4

22. CPRE does not support Policy SL4. It concurred with the view taken by the panel which sat in judgement on the now revoked North West Regional Spatial Strategy - that there should not be a special hub/attractor at the airport. It should serve its prime purposes only.
23. CPRE is concerned that a major focus of development contained in the Draft GMSF is at Manchester Airport and it has potential to suck economic activity and investment away from existing urban areas of Greater Manchester to more rural parts of the conurbation. This is not sustainable development and would lead to an imbalance in the future planning of the Greater Manchester area. The RSS panel strongly advised against making the airport a destination in its own right.
24. CPRE was also deeply disappointed that, when the airport masterplan was consulted upon, no notice was taken when we asked in our response for there to be proper investigations into the long-discussed concept of creating a western rail link into the airport from the existing heavy rail line between Ashley and Mobberley (ie. connecting into the Chester-Manchester service). This offered such enormous potential to remove a large number of road trips to and from the airport (and therefore help reduce air pollution) and many railway specialists believed it was eminently feasible.
25. CPRE is opposed to any unnecessary loss of open land around Manchester Airport because it is needed to absorb harmful emissions and therefore we cannot support the unspecified call in point ‘D’ in the policy on page 25 that there should be “improvements to local and strategic highway infrastructure”.

26. The GMSF must plan for needed airport expansion (both short and long haul) grounded in robust analysis of likely passenger numbers and freight tonnage. The development planned is for double the number of current aircraft movements. CPRE believes this projected level of growth is overly ambitious and not grounded in a realistic estimate of the increase in air travel demand.
27. Proper consideration must be given to consequences of Brexit, the fall in the value of sterling and other realities, such as the much reduced number of applications to Greater Manchester universities from European students. Against this background predictable negative factors and of uncertainty others, it is very probable that Manchester Airport may not increase its air traffic for several years. (N.B. CPRE has a neutral policy on the European Union, either way CPRE wants the countryside and urban green spaces to be enhanced and protected as new development is planned and recommends the draft GMSF reinforces EU environmental protections, by explicitly stating EU environmental designations will be applicable to new development in the future throughout the policy and land allocations.)
28. A full environmental impact assessment should examine whether there is an upper limit of air-traffic movement and the consequence of 45 million passenger numbers to traffic increases, increased noise levels, poorer air quality and other key environmental concerns. We must fully understand the impact on our environment and understand what measures can be taken to mitigate for potential environmental losses. We must ensure any new development at the airport is not only justified but represents net gains for the environment if necessary through appropriate mitigation; where mitigation is not possible, the development should not be permitted.
29. For example, land at Sun Bank Farm used for dairy and beef cattle was lost against local wishes, and the land released from Green Belt designation, to make way for a super-sized logistic shed warehouse, but the new occupiers are not tied to airport related uses. The Trafford Borough border area with Manchester Airport now has a much depleted amount of countryside land as a consequence. As part of the planning application a strip of green land was included for environmental mitigation and compensation purposes but we understand this has now been tarmacked as part of the motorway slip road widening so there is a negative environmental impact from this development. The Enterprise Zone has simplified planning status, but the GMSF must secure net environmental gains for Greater Manchester, particularly when greenfield land is developed in the conurbation.
30. Operational conditions should be imposed to ensure that development on greenfield land at the airport is tied to airport uses. Otherwise the big shed developments could arguably be situated on existing brownfield land and may serve to undermine ambitions for other employment uses elsewhere in the conurbation.
31. CPRE believes the Timperley Wedge should be retained as a high quality rural setting and that the office and housing development at Davenport Green should not go ahead. Currently the area is not well served by local public services and Davenport Green is a very valuable green lung in an increasingly over-developed area which has ever-

decreasing air quality. The issue of air quality in the city and town centres, along the main road arteries and particularly around the airport must be addressed.

32. Cotterill Clough Sites of Special Scientific Interest and other local Sites of Biological Importance must be afforded proper environmental protection.

Western Gateway and Policy SL5

33. CPRE is unable to support vague and far-reaching policies which make references to aspirations such as “a larger growth corridor stretching to Liverpool”. Spatial planning needs to be more precise than this.
34. CPRE accepts some new jobs and housing development should occur at the Western Gateway, but we do query if the proposed large scale is appropriate. What is the relative addition to the existing of employment? Does the new estimate of development in the Western Gateway amount to double or triple the floorspace of the existing buildings?
35. The economic activity of the local areas of Carrington, Partington and Sale West is undoubtedly set to increase as a result of Policy SL5, but what about the social and environmental harm caused as a consequence of 750,000 m2 of employment floorspace and associated dwellings? Development on this scale would put at risk the many well valued outdoor activities located, not least horse riding and Manchester United’s training ground.
36. Equally the residential communities of Irlam and Cadishead are set to lose much valued rural land.
37. Development at Port Salford to enable more freight to be waterborne on the Manchester Ship Canal and to Port of Liverpool and also via rail-served industrial and warehousing development rather than the motorway network is supported by CPRE.
38. CPRE also advocates phasing to manage and monitor the supply and development of large-scale development.
39. CPRE supports significant investment in transport, but feels the largest proportion should be directed at more sustainable travel modes rather than be road based. Research shows that building more roads does not relieve congestion; it merely attracts further development until the associated increase in the number of results in the same level of congestion. We want a modal shift so that new development is based on more sustainable transport; we have to invest in alternatives to the car and the HGV. The improvement of the M60 Motorway to a “Smart Motorway” has been on-going for a considerable period already at very great cost not only for the work itself but also for the economic loss due to the consequential delays. The M62 section between junctions 18 (with the M60) and 29 (with the M1) through Greater Manchester and West Yorkshire has been identified as one of the most congested roads in Britain (*M62 junctions 18-29 route-based strategy report*, Highways England, March 2013). But, we would ask, is the answer to simply provide ever more highway capacity, which will simply attract more

trips by road and fill up after a few years? So, we cannot support points 'A' and 'B' of policy SL5 on page 28.

40. CPRE supports the proposed heavy rail measures in this policy, and also a further Metrolink to Trafford Park is welcomed, to support more sustainable journeys by people who work and use the area.
41. Air quality is the key issue for the Western Gateway as CPRE is aware that air pollution is significant, possibly illegal, in the locality due to the high volume of motorway traffic, waste water treatment facility at Davyhulme and the industrial activity at Trafford Park.

Northern Gateway and Policy SL6

42. The corridor identified in this policy points towards the Peak District National Park and part of it borders the Park, yet it is not even mentioned. This is another vast spatial concept which the policy itself admits would require "very significant investment in transport infrastructure" and which could have any number of unidentified social and environmental consequences. We can support the public transport and active transport provision listed in the policy (which ought to be delivered first anyway), but not the extra road capacity. As an entity, we are unable to support this policy.
43. CPRE would like to understand better what is meant by nationally significant in Policy SL6. Also large scale logistics employment space seem to be included in all GMSF allocated strategic sites and are focused on motorway connections and reliant on further motorway to overcome existing congestion, such as at the Northern Gateway at Simister Island at the intersection of M60, M66 and M62.
44. There seems to be a proliferation of huge speculative distribution sheds (as exemplified by the picture below: extract from page 32 of the draft GMSF) along the length of the M62, particularly between Manchester and Liverpool and this scale of development is a prominent feature of the landscape for considerable distances. This is a very inappropriate form of development in rural places. Modern distribution operations are reliant on automated robotic and computerised systems, so serious consideration should be given to the environmental cost versus the economic benefit in terms of number of skilled jobs and GVA for the conurbation from such land hungry uses. This type of operation should arguably be based on rail, and waterway and not motorway transport. GMCA has to consider is it worth sacrificing this quantity of greenfield land for the level of jobs associated with it. Who is set to gain, is it local people from local employment? How much GVA can the Greater Manchester conurbation achieve from B8 type warehousing uses? Is the distribution all retail based and, if so, is it susceptible to economic volatility? Is this the best way to achieve a secure and diverse economy? Overall Greater Manchester needs to export goods and services, it cannot survive as a net importer or distribution centre.
45. CPRE is supportive of the rebalancing of the economy within Greater Manchester understanding that Rochdale and Oldham have some of the worst performing areas in terms of socio-economic indicators. However, CPRE would like new employment to be

in emerging industries that bolster the structure of the local economy and support local people into higher paid jobs via access to training and skills.

Eastern Gateway and Policy SL7

46. As with the previous policy, this one proposes large development in close proximity to the Peak District National Park. Much of this one is also on what remains of a peat bog (Ashton Moss) - an important natural reserve for the capture of carbon. There is also an issue about the type of development proposed and therefore, again, we find ourselves unable to simply endorse this policy.
47. CPRE is supportive of the rebalancing of the economy within Greater Manchester, understanding that Ashton-Under-Lyne trails behind other parts of the conurbation in terms of socio-economic indicators.
48. Policy SL7 proposes yet more warehousing at Ashton Moss, new land to the north and west of Ashton Moss, a new Garden Village at Godley Green and expansion of the Bredbury Park Industrial Estate in Stockport. The Draft GMSF sets out that, in the short term, land at Ashton Moss has been identified as the outstanding opportunity site for a potential Manchester EXPO 2025. According to the draft GMSF the site offers a strategic opportunity for direct access to the M60, Metrolink at Ashton Moss and a proposed new railway station which would provide heavy rail access to Manchester.
49. CPRE is aware that the travel times via road between Manchester and Sheffield have become 50% longer in the last 27 years. In 1989, it took 1 hour to travel the 40 mile distance and in 2016 it takes 1 hour and 30 minutes. In part, this is due to increased housing developments in Glossop, additional traffic light controlled junctions and increased congestion at the eastern end of the M67 at most times of day, and at the western end of the M67 at the junction with the M60, particularly at peak times.
50. CPRE is therefore supportive of the concept of a new Droylsden railway station on the Manchester to Ashton-under-Lyne railway line with consideration given to a passing loop to enable through trains to avoid the station, but siting is everything.
51. CPRE is also supportive of other improvements, including cycle parking facilities and enhanced pedestrian access to Hattersley and Hyde Godley rail stations, and a link road connecting residential development on Little Moss to Lord Sheldon Way (A6140) via a new road bridge across the railway line.
52. CPRE is generally opposed to the provision of new road capacity (other than local safety improvements) as this leads to more trips and prompts infill development. The associated increase in traffic and eventual congestion merely leads to further calls for yet more highway capacity and cannot be justified as part of a holistic and environmentally sound plan. The demand for car based trips must be reduced by investment in a smart-ticketed, integrated public transport system that includes heavy and light rail, bus services and far better provision for active travel. Therefore CPRE would wish for all possible alternatives to be considered in advance of the construction of new roads such as the Mottram-Tintwistle Bypass, to which it remains opposed, and

improvements to suggested motorway junctions 23, 24 and 25 of the M60 (and surrounding road networks) and improvement works for the A57/A628 near Mottram. Any alleviation of congestion would be short term as additional capacity is filled by additional motor based trips. CPRE also opposes the concept of a Trans-Pennine road tunnel, which would create major traffic problems at either end and which would have to have six metre wide extraction funnels rising up in the Peak District National Park.

53. CPRE strongly supports new cycling and walking infrastructure linking to existing residential areas providing access to new employment opportunities, education and public transport, and the wider cycling network. Perhaps the GMSF could prioritise investment in sustainable transport modes in advance of other types of transport infrastructure so that the conurbation can satisfy its demand for travel more effectively to accommodate the high growth identified.

Corridors

54. The draft GMSF must guard against urban sprawl via ribbon development along key arterial routes, and should not overly focus development based on increasing road travel on already congested highways and motorways. The GMSF must do more to reduce the demand for car and HGV travel around the conurbations roads due to the harm caused to the environment and health. . It is not going to do this with overly excessive provision for logistics operations.
55. CPRE notes that much of the development proposed will only be progressed subject to investment in adequate transport infrastructure, particularly public transport, for some new residential neighbourhoods. We look at each corridor in turn below:

East Lancashire Corridor (Wigan and Salford) - Policy SL8

56. Policy SL8 can only be partially supported because of the apparent lack of joined-up planning or cooperation with St. Helens Council, which also has massive development aspirations along the East Lancashire Road in its Local Plan and because of Green Belt impacts.
57. The East Lancashire Road is identified as a key growth corridor linking Manchester with Merseyside via Tyldesley. Other sites are located South of Pennington and Astley and Boothtown. The Leigh Guided Busway serves the area and must be integrated into other public transport services. An extension to Metrolink may help in this regard via developer contributions. The rail services to Newton-le-Willows in Merseyside are understood to be slow and infrequent and these would require upgrading; the outmoded existing diesel rolling stock urgently needs replacing.
58. CPRE welcomes the new RHS Garden Bridgewater in Worsley as a nationally significant outdoor tourism facility and hopes every effort will be made to ensure cycleways and Public Rights of Way connect the local area and wider Greater Manchester to the new facility. It is understood however that access will be ticketed, so alternative freely accessible local green space will also need to be provided in proximity to the site for the benefit of all.

59. CPRE is pleased to learn that the draft GMSF wants this Green Belt gap to be retained, but queries whether in reality this land could ever have been developed due to the existence of lowland wetlands, mosslands to the south, remnant pockets of lowland raised bog, flashes, open water, fen, swamp, woodland and grassland. Of course we agree this green area should be protected for its residential amenity, leisure and recreation offer and most importantly to protect habitat and wildlife that already benefits from environmental designations to protect it from development. We believe the GMSF could do more to identify *non-developable* green areas, i.e. designate more Green Belt land. Further, in a wider perspective, CPRE recommends more Green Belt land is designated to ensure the overall quantity of Green Belt across the conurbation is not diminished.

M61 Corridor - Policy SL9

60. Here again CPRE can only partially support some of this policy and it objects strongly to the proposal to build a new road across the Green Belt.
61. The Lancashire Gateway is via the M61 to Preston and wider Lancashire. New strategic opportunities are developed at Hulton Park and Chequerbent, west of Westhoughton. Short term developments include the completion of Logistics North and Wingates Industrial Estates.
62. The reasoned justification for these corridor proposals is that the new development in the strategic development area will make the best use of the existing transport network and enable improvements to it. However, the plan for this corridor is focused heavily on road based travel, with a new road link proposed to connect junction 5 of the M61, bypassing Westhoughton through Wigan to the M6 and M58 motorways helping to better integrate the M61 corridor with the rest of the western side of Greater Manchester. CPRE believes GMCA should think twice before building new roads as ultimately more roads equates to the generation of more road traffic congestion as explained above.
63. CPRE endorses the reference to new pedestrian and cycle links to connect new development to the town centre and rail stations at Westhoughton and Daisy Hill.
64. CPRE can see merit in the mixed-use nature of the scheme, but how sustainable the mixed use community in this location would be is questionable.

M6 Motorway Corridor (in Wigan) - Policy SL10

65. CPRE cannot support a policy which condones a major motorway as a “growth corridor” and indicates it wants to see significant development in Green Belt between two of the motorway junctions which would close up the Green Belt between Wigan and Newton-le-Willows and Warrington. Proposals are again on the cards for a massive, sprawling logistics area on Green Belt at Parkside where the borders of Wigan, St. Helens and Warrington meet. Why is this not discussed in the GMSF and why is such an enormous logistics proposal not considered in tandem with the many that the GMSF is proposing?

Here again, we would raise the issue of the duty to co-operate with adjoining authorities.

66. This corridor represents the western most area of Greater Manchester and includes junctions 25 and 26 of the M6 motorway.
67. Concerning Figure 2.1 (Key diagram) below, CPRE queries why the proposed development focus areas do not better align with new enhanced rail links? It would be helpful to understand if Metrolink has any proposed extensions connecting to the proposed growth areas. CPRE suggests additional information concerning Metrolink extensions and possible orbital link to support a reduction in cross town traffic as the conurbation grows. Green Belt ought to be shown on this plan in terms of Green Belt as it now exists and the proposed loss.
68. At least in the Policy there is a need identified for effective screening and landscaping to safeguard the amenity of nearby residents. This is perhaps a policy requirement that should be mirrored across all corridors and all proposed logistic shed developments.
69. Where employment land is identified, CPRE suggests GMCA provides some blue-sky thinking for innovative design solutions to the form of the buildings in fringe/rural environments. Rather than big boxes surrounded by extensive vehicle hard landscaped areas edged by high boundary fences and security lighting, perhaps a softer more integrated design could be developed promoting raised embankments planted with trees and shrubs, and the use of low carbon technologies such as photovoltaic as a requirement wherever practicable. Such large scale developments should be integrated with the local environment and offer additional local community benefits, above and beyond job creation. The new development at M5 Motorway Gloucester Services could provide a workable example to greening large developments and actually allow people to still access the green space.

Section 4 Thematic Policies

Delivering a successful Greater Manchester

Policy GM1

70. CPRE supports the thrust of this policy but feels it is let down by the subsequent one. In this policy it says that “some development of greenfield sites outside [of urban areas] will be required”, implying that this would be kept to an absolute minimum and be the exception rather than the rule. However, as the previous policies under ‘Corridors’ and the subsequent one on ‘Industrial and Warehousing’ make abundantly clear, this is far from the case.
71. CPRE is very pleased that GMCA states it wants to deliver a successful Greater Manchester in every sense: economically, socially and environmentally. Therefore we welcome the focus of Policy GM1 on development in sustainable locations, reusing brownfield land, and delivery of improved infrastructure (which we take to include

green infrastructure), facilities, services, and environmental quality for existing neighbourhoods.

72. GMCA must do all it can to regenerate all brownfield land in advance of more countryside land loss with the inclusion of an effective sequential test within the allocations policy to ensure brownfield land is routinely brought back into use and recycled rather than remaining in an under-used, or worse, in a vacant and neglected condition.
73. It is crucial the GMCA effectively supports the Manchester, Salford, Wigan and other Brownfield Pilots. There is concern that the scale of brownfield land identified in the new pilot register is so much lower than the last National Land Use Database (NLUD) figures. If this reduction is due to land being brought forward due to regeneration, then this is to be applauded. However, if land has 'disappeared' from the database as it is deemed too constrained or 'unsuitable' for inclusion this would be of concern. Therefore GMCA needs a mechanism for validating all brownfield is recorded. It would result in a waste of space in the urban areas, a missed opportunity for regeneration, and an unnecessary burden placed on building in the countryside.
74. We would like more information on the Mayoral Development Corporation. To ensure the maximum exploitation of brownfield land, we are supportive of the use of Compulsory Purchase Orders to enable to ensure the effective delivery of suitable sites. When vacant brownfield land exists, we do not believe public money should be spent on developing greenfield land in the countryside, as manifestly there are too many adverse impacts from doing so.
75. We agree that building at higher density in urban areas is important to ensure the right level of urban concentration of development and to make feasible the right level of needed transport investment, specifically in public transport services.
76. The scale of development to be planned must be realistic. CPRE commissioned an independent expert demographer to critically appraise the housing base. He has demonstrated that a number of flawed assumptions result in an inflated number of houses to be planned and this along with the jobs number need to be reduced. Further details are set out under our response to Section 8 below.
77. The allocation of greenfield land, including Green Belt land, must be tightly controlled, as an over-supply will cause piecemeal development and will jeopardise the viability of urban brownfield, and the prospect of its reuse. Where greenfield land development is justified, its allocation must be based on objective criteria relating to employment and housing need and the possibility of mitigating environmental harm. Transport and other infrastructure must be provided by developers and form part of the overall development cost.
78. CPRE believes strongly that, greenfield development should be subject to a levy to ensure a developer contribution to subsidise the costs associated with removing barriers that constrain the development of brownfield sites. We absolutely agree that new

development on greenfield sites, where evidenced as needed, must not conflict with the aspirations for regeneration elsewhere in the conurbation.

79. CPRE acknowledges that there may be brownfield sites identified of community or ecological value. In such cases these should be identified formally as such and be designated as Local Green Space with public access, so they genuinely provide a community benefit as opposed to dis-benefit, which is generally the case.
80. We are pleased to see that the draft GMSF is clear that infrastructure required will be wholly funded by the developer. CPRE has flagged to the Department for Communities and Local Government that the National Planning Policy Framework is flawed in the way it allows developers to claim viability issues (such as infrastructure and affordable housing) to back-track on contributions agreed as part of acquiring planning consent. The GMSF should make sure this problem is tackled by the wording of its written policies.

Section 5 Industrial and warehousing

Policy GM2

81. Four million square metres of new industrial and warehousing floorspace is planned in addition to existing provision. CPRE cannot support the bulk of this policy (a) because the 40% increase in the development rates compared to the average for the period since 2004 is simply too ambitious, resulting in an over-provision for warehousing/ logistics, and (b) because of the focus on Green Belt development on motorways close to the borders of Greater Manchester.
82. It is difficult to understand the source of where all of the employees for these jobs are to come from? The economic analysis would suggest outside of the area given the growth in housing numbers. The economic analysis is far from transparent and therefore its robustness cannot be validated.
83. The GMSF appears to lack a duty to cooperate with its neighbouring authorities. The GMSF cannot be considered 'sound' by a planning inspector unless GMCA can demonstrate that it has worked well with all its neighbours and taken their plans into consideration. CPRE is concerned that there is a serious and significant cumulative impact of a number of employment sites along the M6 Corridor being progressed by the GMSF (28.7.2 M6C2 Junction 26) and in Wigan, and by neighbouring authorities including St Helens (Florida Farm, M6 Junction 23), Chorley, Bolton and also by speculative developers. These substantial employment sites are adjacent but just outside of Greater Manchester, also in Green Belt land focused on motorway corridors. The cumulative impact must be understood for both economic activity and countryside loss.
84. Policy GM2 states opportunities to serve these sites by rail and water should be taken wherever practicable, to reduce the amount of freight moved by road. However, most sites are focused on motorways. The GMSF must carefully consider the mix of employment sectors it promotes in the future to ensure the right balance in B2 Manufacturing and B8 Distribution and a healthy economy in the future. People need

skilled sectors that will last for the medium to long term and requisite education and training infrastructure put in place. Advanced manufacturing and material science needs to be harnessed with links to the Higher Education institutes.

85. CPRE supports a phased approach, and advocates a plan, monitor and manage approach to effectively use strategic sites in the long term post 2035.
86. Each local planning authority would need to ensure their local plans dovetail as appropriate. It would be especially important to protect the strategic employment role of major industrial and warehousing locations and restrict speculative and sporadic development of greenfield land.
87. CPRE recommends that sites in Green Belt should not be developed and maintains that if the jobs growth projections were more realistic, there would be no need to develop Green Belt sites.

Section 6 Offices

Policy GM3

88. A further 2,450,000m² of office space is also planned on top of what already exist. CPRE cannot support this policy because we believe over-provision is being made for office accommodation, based on out-dated economic formulae which do not take into account the phenomenal rise in home working.
89. The Office for National Statistics released figures in 2014 which showed that 14% of employed people in the North West were working from home all or part of the week - and the trend was steeply upwards. It is not known what the actual figures are some two years later but, based on the trajectory, it is thought they will be no less than 15% and probably more. With the internet now being available to virtually everyone, there is no longer a need to assemble most desk-based workers or sales staff in offices.
90. In fact, many office blocks are now being converted to apartments. We fully accept that there will still be a requirement for office working but do not accept that the scale projected is realistic.
91. The City Centre should be the focus of office uses, followed by The Quays and Main Town Centres, to take advantage of their sustainable locations and good public transport links.

Section 7 Retail, leisure and tourism

GM4

92. CPRE is generally supportive of Policy GM4.
93. CPRE recommends that GMCA should consider the contraction in retail floorspace requirements as a consequence of online retailing and look at suitable alternative uses such as housing. Where retail units are retained or new ones built, there should be an

active policy of LOTS - Living Over The Shop. It also recommended that GMCA looks at all the opportunities for the creation of open green space both within and outside of the built up areas of the conurbations in support of leisure activities and tourism, so helping to ensure that it is a hugely attractive and enjoyable place in which to live, work and to visit.

Section 8 Housing

Policy GM 5

94. CPRE is alarmed by the scale of the housing provision proposed by the GMSF, some 227,200 dwellings, equating to 11,360 dwellings per annum over the plan period up to 2035. This figure when compared to other plans represents an untenable spike in population growth and household formation (see comparison table below).

Comparing Housing Requirement Figures

95. In comparison, the North West Regional Spatial Strategy planned for 173,200 dwellings between 2003 and 2021, equal to 9,623 per year. The Government scrapped these regional tier plans to stop high housing targets being imposed top-down on local planning authorities. The NWRSS identified a range of infrastructure capacity issues with this level of growth and the Environment Agency expressed concern during the course of the RSS examination in public that there might be insufficient water capacity to service the number of properties proposed.
96. When considering the housing requirements in the local plan of each of the ten local planning authorities, we see 179,629 houses are planned, equating to 10,004 dwellings per annum.
97. To illustrate the extent to which the GMSF housing estimates exceed most of the local authorities own estimates, we have tabulated data for each of the ten local authorities of the GMCA; specified in the table is the ratio of GMSF estimate to the LA estimate.
98. Thus, Rochdale's Core Strategy identifies 7,360 dwellings over the plan period and will be adopted formally in January 2017 following its examination in August by examiner Clive Sproule, yet the GMSF identifies double that number with 15,500 dwellings, a factor of 2.11 greater. Bearing in mind that the RSS data were skewed on the high side and that the Core Strategy data for half the LAs are even higher, the further inflation in many of the GMSF data are a matter of very great concern to CPRE, because the consequences of incorporating such unrealistic housing targets into policy would be very damaging since it would lead to the unnecessary loss of greenfield Green Belt and countryside land.

Table to show comparison of NWRSS, local plan, and GMSF targets by authority

	NWRSS	Local Plan Core Strategy Housing Requirement			GMSF to 2035		
	Total Provision 2003- 2021	Total	Average	5YHLS	Total(Relative)	Annual	5YHLS
Bolton	10,400	12,492	694	3470	16,800(1.34)	840	4,200
Bury	9,000	12,500	400	3,195	12,500(1.00)	625	3,125
Manchester	63,000	60,000	3,333	20,655	55,300(0.92)	2,765	13,825
Oldham	5,200	6,900	460	2,300	13,700(1.99)	685	3,425
Rochdale	7,200	7,360	460	2,300	15,500(2.11)	775	3,875
Salford	28,800	33,217	1,748	8,741	34,900(1.05)	1,745	8,725
Stockport	8,100	7,200	480	2,400	19,300(2.68)	965	4,825
Tameside	13,500	12,750	750	3,750	13,600(1.07)	680	3,400
Trafford	10,400	12,210	678	3,390	23,100(1.89)	1,155	5,775
Wigan	17,600	15,000	1,000	5,000	22,500(1.50)	1,125	5,625
GM Total	173,200	179,629	10,004	55,201	227,200(1.26)	11,360	56,800

99. Manchester's and Wigan's local plans were adopted post the introduction of the National Planning Policy Framework, 2012 (NPPF). Manchester has a reduction in the number of houses to be completed annually from 3,333 to 2,765 per annum. However, CPRE is aware Manchester has already brought forward considerable housing completions in recent years explaining this reduction, whereas Wigan has a growing backlog.
100. The National Planning Policy Framework, March 2012, as interpreted by the judicial reviews [2013] EWCA Civ 1610 and [2014] EWHC 1283 (Admin), introduced a two stage process in estimating the housing requirement in local plan making:
- I. Stage one requires the objectively assessed housing need (OAHN) to be estimated by the local authority without regard to supply constraints, commitments to other local authorities and aspirations to economic growth. The starting point should be the most recent housing need projections published by the Department for Communities and Local Government (DCLG) which are based on the population projections published by the Office for National Statistics (ONS). The local authority must then refine these projections by taking account of those demographic factors which are peculiar to its local circumstances. Normally local authorities use the nationally recognised projection software called POPGROUP with which to take account of these demographic factors in calculating the OAHN for each year over the local plan period.
 - II. Stage two is translating this OAHN into the housing requirement, or housing target, which takes account of the protections afforded by the NPPF to restricted land (which includes Green Belt, see paragraph 14 and its Note 9 for the kinds of sites that fall into this category), commitments to other local

authorities and aspirational economic growth. Because of the policy dependence of the housing target, this stage of the calculation of housing need is referred to as OAHN(policy on) and, in contrast, the calculation of housing need for stage one is referred to as OAHN(policy off). Of these three factors, taking account of Green Belt land will reduce the housing target whereas the other two factors will increase it. The housing target is the metric to be used in testing compliance with the 5 year housing land supply (5YHLS) rule (NPPF paragraphs 47, 49 and 14).

101. The Core Strategies of Bolton, Oldham, Stockport and Trafford were adopted pre-NPPF, so there is a doubt that the policies are consistent with those of the NPPF. The Boroughs of Bury, Salford and Tameside are relying on saved policies of their Unitary Development Plans adopted pre-2006, so many of the data on which their policies are based are out of date.
102. Inconsistencies⁶ in the way examination inspectors have interpreted the NPPF policies mean not all post-NPPF local plans have been prepared in line with the second stage process meaning some have housing targets that are actually the full OAHN without reflecting the important downward adjustments to take account of restricted land.
103. Also the use of two separate approaches 'Sedgefield' and 'Liverpool' for tackling historic under-provision also means some local authorities are front loading housing delivery (Sedgefield method) and therefore planning for a very high number of houses. In combination with the operation of the 5YHLS rule, which allows developers to exclude land with extant planning permission for housing on viability or availability grounds, this means local authorities are now significantly over-planning for housing.
104. So, the combined local plan figure of 179,629 dwellings must be viewed as a high end housing requirement figure for Greater Manchester. If restricted land (including Green Belt and other categories such as Sites of Special Scientific Interest) were properly considered and the consequential downward adjustments made, the housing requirement would be significantly lower.

Demographic Appraisal of Housing Evidence Base

105. CPRE believed a second opinion on the GMSF housing figures was necessary to test the robustness of the housing evidence base. Piers Elias an independent demographer was therefore commissioned to undertake a thorough objective appraisal of the demographic dependent data of the GMSF. Piers Elias's full report and appendix is found at the end of this document and is referred to hereafter as the Demographic Appraisal.
106. The Demographic Appraisal identified a number of critical problems with the housing projections of the GMSF due to flawed assumptions used leading to an erroneous higher than necessary housing requirement target.

⁶ Signal Failure Report Nathaniel Lichfield & Partners, March 2015

107. The starting point for the GMSF OAHN (policy off) should be the ONS/DCLG 2014 based projections as it is the only scenario that can claim to be fully objective. This gives an OAHN (policy off) of 9,423 per annum or 188,462 over the 20-year plan period.
108. In the interests of clarity, CPRE will comment first on good practice, and will then focus on unsound practice that must be remedied to ensure the GMSF as it emerges can be found to be sound.
109. It is good practice that the draft GMSF has been updated to include the latest set of population and household projections (both 2014 based) and that the trends feeding the latest sets of sub-national projections provide a sound basis as the starting point for Objectively Assessed Housing Need (OAHN (policy off)). ONS Population Projections from 2014 are in line with most recent (2015) Mid-Year Estimates and the assumptions around vacancy rates are sound and reflect current thinking. There are no issues surrounding the use of the fertility and mortality rates from the SNPPs and Greater Manchester area is still attractive in terms of housing, work and study, with the latest figures showing continued strong net immigration to the UK, and Greater Manchester.
110. Looking at more problematic issues, CPRE note there is evidence that the 2014 based sub-national household projections (SNHPs) are over-projecting the numbers of households; figures for 2015 show DCLG household projections are 1% higher than equivalent DCLG estimates.
111. Most problematic is that the Local Plan Expert Group (LPEG) recommendations around migration are flawed and they are not objective and must not to be included in the calculation of the housing target.
112. The LPEG recommendations on migration and household representative rates (HRRs), result in an annual dwelling requirement of 11,500, but should NOT be considered as the housing target. The LPEG recommendation of using the larger of two sets of migration data leads to multiple counting of migrants across the ten local areas and/or across the country. It is falsely inflating the housing requirement.
113. The Housing Target should be 9,894 dwellings per annum, 197,885 over the 20-year plan period. This includes a 5% buffer and is within the range of past delivery.
114. Furthermore the housing evidence base needs more variant projections from ONS (Wales and Scotland already do this) that will provide consistent and objective results for a variety of scenarios testing, in particular longer migration trends.
115. The Demographic Appraisal shows the fundamental flaw in the methodology on which the GMSF projections depend on assuming all areas grow (above-trend) simultaneously (an assumption which regrettably government policy encourages), which is mathematically impossible unless the growth is fed by higher international migration, something which is extremely improbable, given the government's BREXIT policy. CPRE believes GMCA must revisit the housing target estimates to understand the source of all

the people for jobs and housing implicit in them. In other words, CPRE asks “Where exactly are all the people coming from?”

116. Further to the previous paragraph, analysis of administrative data for international migrants for 2015 suggests growth in numbers coming into Greater Manchester, but statistics on those leaving each year are not available.
117. The Demographic Appraisal identifies that the construction sector has slipped into recession and this could undermine the ability of the industry to supply significantly more housing due to economic issues. Phasing the delivery of housing completions makes sense and should be reviewed regularly to refine the plan as it moves forward. CPRE endorses the recommendation for the GMSF to be subject to review every two years.
118. The Demographic Appraisal importantly addresses the fact that the LPEG recommendations are based on erroneous methodology. CPRE made similar representations to the LPEG in which we demonstrated its recommendations would serve to worsen problems of local plan making and house building, because they attributed wrong causes to our national housing crisis. In addition, there were a large number of highly critical representations (50+) made to the House of Commons Select Committee for the DCLG in response to its call for evidence (July, 2016). A serious omission of the LPEG recommendations is they lack demographic input from either local government or the ONS.
119. The LPEG recommendation to use the higher of five or ten year migration estimates leads to double counting of migrants. The Demographic Appraisal recommends that, to avoid this, ONS should produce both sets where the migration is controlled and consistent across all Local Authorities. Only then would it be acceptable for LPEG to decide which set to use, and to use the same set across the whole country. CPRE supports the call for the LPEG recommendations to be reconsidered as a matter of urgency.
120. Furthermore, the LPEG recommendation to increase HRRs 2008 levels is arbitrary and subjective. The trends in the 2014 based SNHPs use data going back to 1971 and the latest Labour Force Survey data to 2014 and these should be used, not least because they are objective and more up to date. Accordingly, this LPEG recommendation also needs urgent reconsideration.
121. Crucial to achieving a sound housing target is that a distinction should be made between scenario-testing to examine the ranges of the Housing Target and the adopted housing target, which should be based on authoritative projections that are consistent across the country i.e. use ONS/DCLG projections as the starting point for demographic analysis.
122. CPRE believes GMCA must revisit another LPEG recommendation that fails in practice, namely the uplift for affordability. In this case, the GMSF SHMA discounts the recommendation as it leads to implausibly high results.

123. CPRE and the Demographic Appraisal found that there is no information on how Oxford Economics establish their population projections. Further information should be sought to clarify their methodology.
124. The Demographic Appraisal raised a point of clarification on the definition of unemployed. The SHMA (Section 4.128) refers to the unemployed along with the economically inactive - they should be included as part of the economically active.
125. The Demographic Appraisal concludes that unless Oxford Economics jobs growth numbers are tested in POPGROUP (or other authoritative projection software) to assess plausibility and consistency across population and dwelling changes, they cannot be accepted as tenable. Four scenarios are suggested to test the robustness of the figures.

GMSF risks setting-up Greater Manchester authorities to fail

126. GMCA must not burden local planning authorities with housing targets that are based on unrealistically high aspirational growth. Such high housing targets set local authorities up to fail, because their performance is measured against annual housing completions compared to the housing target, yet they have no direct means to ensure the target is reached, since they can only grant planning consent on land, but not physically build houses themselves.
127. The result the 5YHLS rule not being satisfied is that local authorities are required to allocate more viable and immediately available land for housing, and this almost certainly will mean unsustainable development from off-local plan greenfield land never intended for development by speculative developers.
128. During a hearing on 28 October 2016 of the House of Commons Select Committee⁷ for the CLG enquiry into the ability of the homebuilding industry to build the large number of houses needed, senior representatives of three volume developers were asked if land-banking was part of their business model so as to limit completions in order to maintain higher local property prices as a function of supply and demand. All three representatives denied land-banking and holding back completions, instead they explained how the number of housing completions lagged behind planning consents for a variety of reasons. Among the reasons they gave are the nature of market cycles, availability of mortgage finance, the risks involved to the house building sector arising from a lack of capacity in terms of the supply chain, recruitment, skill shortages and it was explained there is at least a three to four-year catch-up process to achieve more completions. They stated time is required to prepare large sites before an efficient rate of house building could be achieved, and cash flow considerations meant phasing was inevitable. Also, relevant to CPRE's comments earlier in this document, the developers made it clear they were very dependent on foreign, particularly European, workers.

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<http://data.parliament.uk/writtenevidence/committeeevidence.svc/evidencedocument/communities-and-local-government-committee/building-industry/oral/42635.pdf>

129. However, CPRE has undertaken its own research⁸ and has evidence that the 5YHLS rule does in fact encourage developers to land-bank sites on grounds of viability, in order to trigger further greenfield consents (it also enhances the book-value of their companies). We demonstrated this to be an obvious conflict of interest, as it does not lead to the delivery of the much needed homes on sites allocated in the local plan, but rather a bottleneck in the progressing of sites with planning permission for housing and the loss of land in countryside to the benefit of developers. We have raised the problem directly with the DCLG and called for improvement when the NPPF is revised to remedy the problem.
130. The GMCA, in order to ensure that the GMSF enables sustainable development, should require developers to progress existing planning permissions in a timely fashion. The past performance of developers in completing houses in a timely fashion and honouring agreed contributions for affordable housing, provision of vital community infrastructure and other planning obligations should be a material consideration when assessing future planning applications.
131. Performance against brownfield development should be monitored and greenfield allocations should be phased to later in the plan period so that development of existing brownfield sites is given priority.
132. The House of Lords Select Committee on National Policy for the Built Environment Report⁹ Building better places (19 February 2016) states house building in England has been on a long-term downward trend since the late 1960s; post-war delivery peaked in 1968 when 352,540 dwellings were completed. The figure for the 12 months up to the end of March 2015 is 124,490, which represents a slight recovery from the post-war low experienced in 2010/11 (107,870).
133. Figure One (see extract below) provides an illustration of the long-term trend in housing completions in England. It shows that the private sector has only ever achieved between 100,000 and 150,000 dwellings per annum and that, for a significant uplift in numbers, local authorities along with housing associations have to directly build houses.

⁸ <http://www.cprelancashire.org.uk/campaigns/housing-and-planning/housing/the-issues/item/2144-five-year-housing-land-supply>

⁹ <http://www.publications.parliament.uk/pa/ld201617/ldselect/ldconaf/20/20.pdf>

Figure 1: House building, permanent dwellings completed by tenure, England, 1946–2014



Source: DCLG, *House Building: September Quarter 2015, England (November 2015)*

134. CPRE believes that, for GMCA to achieve the level of additional housing proposed, it would have to negotiate powers from government to actually establish joint ventures between the councils, registered providers, the Homes and Communities Agency and other relevant stakeholders. Time is a key issue, as in order for the public sector to enter the industry it would require investment in training and apprenticeships and a host of other commitments such as land purchases and agreements. Therefore realism in terms of what can be delivered each year for the first five, ten, and fifteen years must be applied to the GMSF.

Duty to Cooperate

135. When comparing local authority housing volume in the GMSF, Manchester is highest ranking with 55,300, of which 85% will be in the form of apartments and 15% houses; Salford is second with 34,900 with 70% apartments; Tameside and Oldham are ranked third and second lowest with 13,700 and 13,600 respectively; Bury is ranked 10th with 12,500, 85% of which is in the form of housing. CPRE is supportive of urban concentration and houses being brought forward in existing urban places making best use of infrastructure and vacant previously used sites.
136. Duty to cooperate is an important aspect of plan making and CPRE believes that the neighbouring authorities surrounding Greater Manchester have not been adequately consulted to find out the scale of their plans and the impacts they would have on adjoining Green Belt. We are aware that the Cheshire East local plan has only recently gone through examination, that it is seeking very high growth and substantial Green Belt release and that the Inspector's report is awaited. There is a considerable number of

houses being proposed on Green Belt land and some sense of the cumulative loss of Green Belt must be undertaken. The Green Belt is being eroded from all angles.

137. CPRE is most supportive of master-planning to ensure new housing is delivered based on sustainable principles and high quality urban design to make the most of the built and natural environment.
138. In the future, two-thirds of the Greater Manchester population is expected to be over the age of 65 years old. Dwelling types must therefore be designed with this end user group in mind.
139. We agree that opportunities need to be taken to use land as efficiently as possible in the most accessible locations.
140. When land is considered for housing development, flood risk must be properly assessed. Also to be considered is the impact of development on the level of the water table locally and the impact for the wider environment, particularly for important rare habitats such as Chat Moss.

Housing Summary

141. The high levels of population and housing growth assumed have little or no prospect of occurring during the plan period. The homebuilding industry has little or no prospect of achieving the level of housing completions suggested as needed. In its present form, this section of the GMSF is predicated on an erroneous methodology, and it must be remedied by a reassessment of both the jobs and housing evidence base.

Section 9 Accessibility

Policy GM6

142. Whilst pleased to note that the GMSF states growth will require careful programming of transport investment, CPRE is not convinced that this carries through the spatial planning as a large proportion of growth is focused on the motorway network and is devoid of train or rapid transit links and much is made of “international connectivity” and the “continued development of Manchester Airport” (Policy GM6) when air travel is the least sustainable method of transport of all.
143. Poor air quality is a real threat to the health of the inhabitants of Greater Manchester. Public Health England estimates that 5.1% of all adult deaths each year in Manchester are caused by particulate air pollution (PM 2.5). And the greatest individual contributor to air pollution is transport. This translates to over 1,000 premature deaths each year across Greater Manchester.
144. The proposed highway improvements will simply add to capacity and therefore encourage higher usage and thus promote further congestion on the road network. For this reason CPRE is opposed to the proposal to build a road tunnel between Manchester

and Sheffield, and because it would require associated large ventilation infrastructure which would scar the rural landscape.

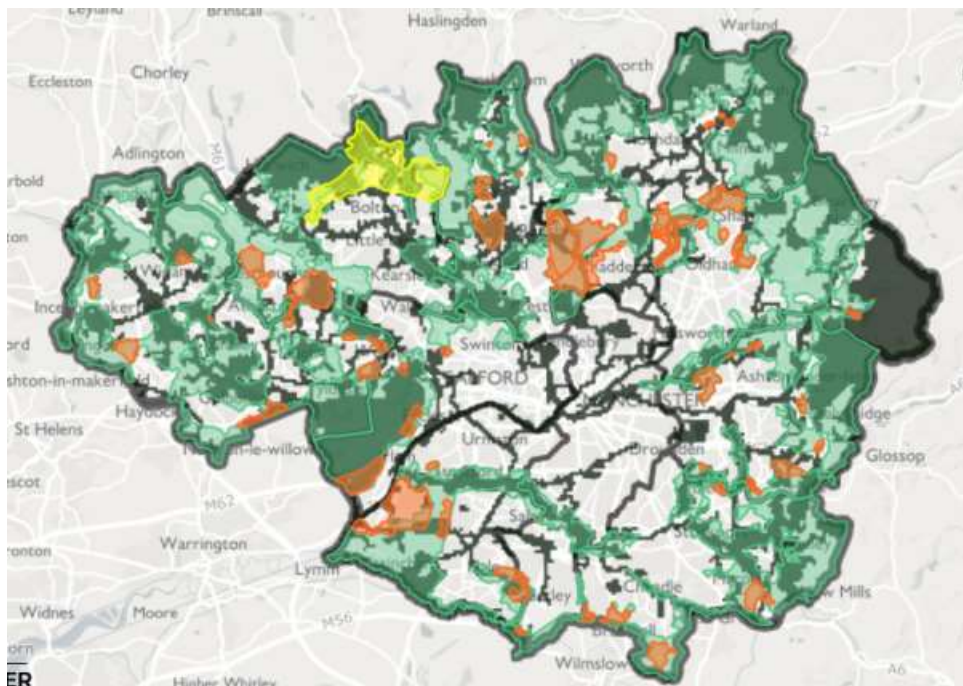
145. There is already serious congestion around the M60 and M62, exacerbated by the upgrade to a 'smart' motorway, due to the increase in road building fuelling significantly more road based travel. More has to be done to achieve a modal shift to rail, tram and bus. Much more has to be done to extend the cycle network to provide safe cycling routes and to provide walkable neighbourhoods. New retail formats are big sheds with large car park formats and this is not supporting more localised retail patterns.
146. Since the draft GMSF was published there has been an important announcement about the proposed HS2 link from Crewe relating to Green Belt land near M56 junction 6 in Trafford in proximity to Manchester Airport, and the spur to Manchester Piccadilly station. Much of the link between Crewe and the site near M56 j6 will be raised higher than previously indicated and the tunnel from there into central Manchester will be longer, rising up in Gorton instead of Ardwick before running into Manchester Piccadilly. CPRE supports economic development being spread northward but is concerned that economic activity is likely to be sucked towards London. An alternative option is to improve existing northern rail connectivity. The Greater Manchester conurbation is too often served by old diesel trains and rolling stock and warrants investment.
147. We understand that further extensions to the Metrolink system are in the offing. We would also like to see tram trains brought forward. Both measures have the potential to take a large number of traffic trips off the roads. Building more motorway lanes and length will not positively impact on traffic or the environmental pollution associated.
148. CPRE is highly supportive of any action to coordinate public transport networks across Greater Manchester. People need reliable, frequent, safe and clean public transport to access jobs and other services. People will not choose to reduce car trips if using public transport is too inconvenient. More routes, increased capacity and more interchanges are all required. Buses need more priority to beat road congestion, real-time information at bus stops and smart ticketing are all moves in the right direction. Safe and convenient cycle routes must be encouraged.
149. Higher densities can help justify increased investment in public transport infrastructure to ensure growth is based on sustainable transport patterns, rather than being too private car reliant.
150. On page 61, we suggest the insertion of especially public services in the first paragraph under the reasoned justification heading: "that well-functioning transport networks, *especially public services*, will be the bedrock of Greater Manchester's future success...."
151. Improved cycle and walking infrastructure should be a priority for investment by GMCA.

Section 10 Green Infrastructure

Policy GM7

152. CPRE is fully supportive of Policy GM7 to extend an integrated network of high quality green space throughout Greater Manchester. CPRE recommends that GMSF sets ambitious targets, in balance with those for jobs and housing, against this policy to be able to show progress as new development is brought forward.
153. CPRE queries what is meant by areas of 'relative' tranquillity.
154. CPRE reminds GMCA that since most agricultural land uses still offer a good degree of public access through the network of public footpaths they should not be restricted. Furthermore we ask that agricultural land should have a place in the introductory paragraph to Policy GM7 and throughout the document local food production should be promoted, due to its important role in feeding the growing conurbation, and not demoted below other land uses.
155. It is difficult to understand how Policy GM7 can be achieved by the proposals to reduce the quantity of natural space, particularly the significant loss of Green Belt protected land. When comparing the mapping for Green Infrastructure and that of Green Belt there is considerable overlap, (see extract from GMSF mapping below) so we urge GMCA to protect Green Belt and enhance green space as much as is feasible.

Extract: GMSF mapping showing Green Belt (light green) and Green Infrastructure layers (darker green). Red shows proposed allocations and yellow is the call for sites area in Bolton.



156. New research published by the Campaign to Protect Rural England (CPRE) shows the huge potential of the Green Belt in terms of amenity and nature conservation¹⁰. CPRE is calling on the Government to prioritise investment in Green Belts in the forthcoming 25-year plan for the environment and make sure Green Belt protection is enforced. Produced by environmental consultants ADAS, [Nature Conservation and Recreational Opportunities in the Green Belt](#) shows how Green Belt is particularly valuable in giving people access to the countryside and opportunities for recreation [1][2]. It also shows how the woodland and wetland in Green Belt can be enhanced to help us mitigate climate change. Given Green Belt's protected status, CPRE argues that we have the perfect case for investment in improving these vital public amenities [3]. ADAS's research sets out several case studies that provide models for how that can best be done in funding terms and by demonstrating where previously derelict industrial sites have been converted to thriving nature reserves and woodland.
157. We disagree with the assertion that less green infrastructure will mean more benefit to Greater Manchester in the future.
158. CPRE strongly believes that all areas should achieve a net gain in Green Infrastructure through the GMSF. Improvements to pre-existing green infrastructure should in particular benefit the local community impacted by new development as it is of no value them to have the improvements at the other side of the conurbation.
159. Policy GM7.7 must refer specifically to the cooling effect of trees in the urban environment. CPRE supports the proposal for more green roofs, walls and planting of street trees. Perhaps a minimum standard could be established.

Section 11 Nature Conservation

Policy GM8

160. CPRE agrees with Policy GM8 that a high value ecological network across Greater Manchester should be secured by the Framework. The GMSF needs ambitious targets for nature conservation to be assessed against as new development is brought forward.
161. As shown in [CPRE new research](#) (see above) the Green Belt has huge potential in terms of amenity and nature conservation. We oppose the significant loss of Green Belt which will of course negatively impact on GM8, and we discuss this matter in further detail under Section 16.
162. When considering wildlife corridors certain standards should be established:
- The corridor should be no less than 500m wide where ever possible (regional) or 300m wide (sub-regional). Another approach would be to include criteria such as, 75% of all

¹⁰ <http://www.cpre.org.uk/resources/housing-and-planning/green-belts/item/4452-nature-conservation-and-recreational-opportunities-in-the-green-belt>

corridors should be of a width no less than 500m, with a further 25% no less than 300m.

- Planning applications should not harm the wildlife corridor or restrict movement, or increase harmful edge effects. (If developments are completely necessary then perhaps include a line about restrictions in building height on properties closest to the corridor)
 - Light pollution near the corridors can have very negative effects on the migration of animals. Ensure lighting is not directed into the corridor.
163. Fragmentation of habitat is an issue that is being worsened by the new central reservation design on smart motorways. The solid structure greatly restricts movement of animals across motorways which span across great lengths of wildlife habitats. Manchester has 'upgraded' to a smart motorway on the M60. CPRE queries whether there a pre-existing plan in place to combat this fragmentation of habitat?
164. A potential solution could be to incorporate wildlife bridges which would allow connections between habitats whilst significantly reducing collisions between animals and humans.
165. CPRE would like to encourage the West Pennine Moors become a Nature Improvement Area (NIA) in the future.

Section 12 Trees and Woodland

Policy GM9

166. Policy GM9 for more trees across Greater Manchester is a great ambition, but CPRE finds it difficult to see how proposed Green Belt land loss will help in this regard. The [*Nature Conservation and Recreational Opportunities in the Green Belt*](#) shows how the woodland in Green Belt can be enhanced to help us mitigate climate change.
167. GMSF needs to adopt ambitious targets for the planting of more trees and woodland against this policy to be able to show progress as new development is brought forward. Furthermore strategic planting of trees is required to achieve flood risk management as trees reduce surface run off and to filter air pollution along corridors that are worse affected by poor air quality.

Section 13 The Uplands

Policy GM10

168. Policy GM10 is strongly supported by CPRE as the distinctive upland landscapes are terribly important for the inspiration and relaxation they provide for all the inhabitants of Greater Manchester.
169. Extending areas of blanket bog through the protection of existing areas and restoration of degraded areas, will enhance the full range of moorland habitats. Proper Upland targets are required to be able to show progress as new development is brought forward. It is important that upland landscapes are maintained for the attribute of

remoteness, distinctive physical landscape features, tranquillity among other important rural characteristics.

170. A policy of restricting Green Belt loss in Upland areas should be promoted as well as a restriction on wind turbines in landscape sensitive areas should be considered as part of GM10 to prohibit industrial scale built intrusions into the countryside.
171. We completely agree with Policy GM10 in its aim of strengthening the upland landscape character in accordance with Natural England's Natural Character Profiles. There are huge benefits from habitat restoration, limiting carbon emissions and reducing flood risk of the wider catchment downstream.

Section 14 The Lowlands Wetlands

Policy GM11

172. CPRE agrees with Policy GM11 supporting an integrated network of wetland habitats as we understand the value for rural character and important function of sequestering and storing carbon, and the archaeological potential.
173. A policy of restricting Green Belt loss in lowland wetland areas should be promoted. The [*Nature Conservation and Recreational Opportunities in the Green Belt*](#) report shows how wetland in Green Belt can be enhanced to help us mitigate climate change.
174. The Salford and Wigan flashes are of immense value to tranquillity, ecology and biodiversity and flood mitigation. CPRE believes the suggested enhancements for free movement of wildlife are important. We are pleased that 40,000 hectares of Greater Manchester has been designated as the Greater Manchester Nature Improvement Area.
175. In particular Chat Moss is internationally significant and it is one of Western Europe's rarest and most threatened habitats with a unique range of wildlife and the minor area of undamaged peat deposits must be protected by hydrological buffer zones and careful management and restoration of the water table. GMCA must do more to protect it.
176. CPRE believes local community engagement and involvement is most important for lowland wetlands. We know a large number of residents are well informed and active volunteers, but not all local people understand the importance of the site for wildlife and wellbeing. This could help combat instances of anti-social behaviour that occur on site such as illegal off road motor vehicles and unlicensed shooting. These two practises among others do damage to newly planted trees and disrupt ground nesting birds and other ecologically important species. Engagement with local schools is encouraged.
177. CPRE recommends that the GMSF should identify ambitious targets against this policy to be able to show progress as new development is brought forward.

Section 15 River Valleys and Canals

Policy GM12

178. CPRE is supportive of Policy GM12 to retain the open character of river valleys, and re-naturalisation of sections where appropriate, and integration of green infrastructure. Clough woodland merits special protection.
179. The re-introduction of meanders to a canalised river provides a huge number of benefits to wildlife which include:
 - Slowing down the erosion of riverbanks and reducing the amount of silt entering the watercourse. This in turn will reduce the amount of maintenance necessary in the future.
 - Re-profiling increases the volume of bankside vegetation, this produces leaf litter and insects for instream organisms as well as a stable habitat on the bank for many types of flora and fauna.
 - Meanders provide natural variation in the depth of the river, allowing for riffles and pools to develop which in turn provide spawning areas for many species of fish including Brown Trout.
 - An increase in the richness of diversity can lead to well-known and adored species like Otter returning to areas after long periods of absence (Seen in areas of Manchester already e.g. River Irwell).
180. CPRE concurs that the heritage, biodiversity, and residential amenity value of such spaces should not be underestimated. CPRE agrees enabling people safe access to river valleys and canals is a good idea as traffic-free access is a welcome relief to urban dwellers.
181. Any freight modal shift away from road based HGVs is welcomed by CPRE, particularly the protection of the line of the former Manchester, Bolton and Bury Canal.
182. New development should maximise the benefit of river frontages with high quality public realm, access to the waterway, and opportunity to connect with river valley and canal spaces.
183. As with other elements of the natural environment targets need to be identified to help understand how the GMSF will improve and protect the river valleys and canals of Greater Manchester.

Section 16 Green Belt

Policy GM13

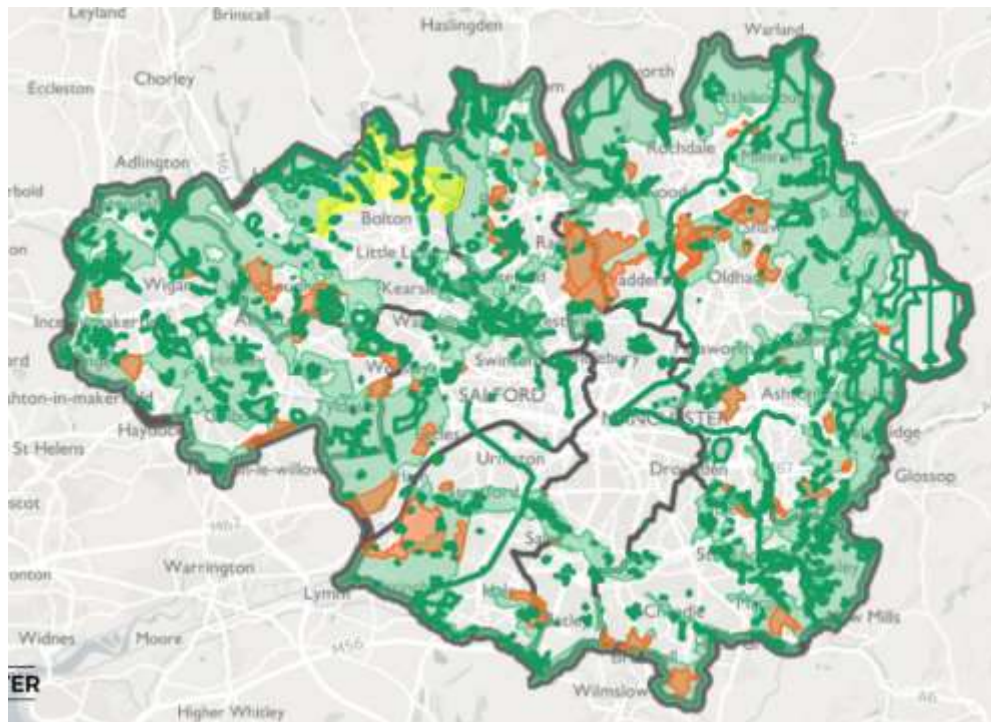
184. CPRE is strongly opposed to the proposed loss of large swathes of Greater Manchester Green Belt as it is unjustified (refer to NPPF par. 80). The loss, equal to 8.2% of total Green Belt land and amounts to some 4,900 hectares, will undoubtedly lead to urban sprawl, cause distinct places to coalesce, will prevent needless countryside encroachment, will harm the setting of many heritage assets, and most crucially will harm the regeneration prospects of many vacant and underused previously developed sites in most deprived areas across the sub-region.
185. This significant loss of Green Belt is against stated policy in the National Planning Policy Framework¹¹ and Ministerial Letters¹² to protect it. The GMCA must acknowledge that because it is the first authority outside of London to progress a spatial framework, it sets a precedent. Such excessive loss of Green Belt is of national importance and it must be brought to the attention of the Secretary of State for the DCLG and his Planning Minister as it odds with Government assurances given in ministerial statements.
186. We are aware that a great many local MPs are in opposition to such significant Green Belt loss and believe the process pursued by GMCA undermines local plan making, which is more democratic. The Green Belt Assessment is not enough to enable Green Belt releases and this must be done through proper local plan making processes.
187. As stated under the employment and housing sections CPRE has shown the extent of development proposed is unnecessarily high. A more realistic lower level of employment and housing development should be planned to respond to Greater Manchester's realistically assessed needs.
188. The target for brownfield land development is woefully inadequate. Previously local authorities across Greater Manchester achieved between 80%-90% brownfield development. A target of 70% is too low and more ambition to use wasted land resources should underpin the GMSF. Of course developers and landowners will always argue that more greenfield development is needed as it is in their interests to do so, but the GMSF should do more to protect vital natural resources and farmland for the benefit of future generations. Land is a finite resource and once countryside is built on, it is gone for ever. CPRE argues because of unambitious approach focus on brownfield resources it can be asserted that not enough has been done to identify reasonable alternatives. As previously stated we are concerned not all brownfield sites are identified on the Brownfield Pilot registers, meaning potential sites are not included.
189. There are two other key issues: the cumulative impacts of Green Belt loss either side of the Greater Manchester boundaries, and the duty to co-operate demanded by the NPPF in paragraphs 54, 178 and 182 has not happened.

¹¹ NPPF Paragraph 80

¹² See Brandon Lewis MP and Gavin Barwell MP letters in Appendix two and three of this response.

190. The cumulative impacts relate to all surrounding geographies. For example, Cheshire East Local Plan, which recently completed its examination in public, is proposing the safeguarding of 22 hectares of Green Belt land for development at Woodford Aerodrome (site ref. CS65) where some 950 houses and other development is already under construction on the Stockport side of the border. Contrary to this the GMSF is also proposing the opening up of a further 238 hectares of Green Belt land at Woodford (ref. 0A20) to accommodate a further 2,400 homes. In addition, alongside the Handforth East North Cheshire Growth Village proposed in the Cheshire East Local Plan - where 1,650 new houses and 12 hectares of employment land are envisaged on Green Belt land (site ref. CS30), contrary the GMSF is proposing the opening up of further Green Belt at Cheadle Hulme to accommodate 3,700 dwellings (ref. 0A22 land off A34) and 2,000 dwellings at Heald Green (ref. 0A23).
191. The apparent lack of cooperation between neighbouring geographies will result in the removal of Green Belt between settlements in Stockport and settlements in Cheshire East and the sprawling of the conurbation of Greater Manchester into Cheshire. This would be contrary to the NPPF and contrary to the emerging GMSF policy GM13 and it suggests a lack of co-operation and co-ordination between adjoining planning authorities. Duty to co-operate with neighbouring authorities must be fully shown in the GMSF.
192. The value of existing Greater Manchester Green Belt appears not to be fully understood by the GMSF. In addition to the primary intended five purposes of Green Belt, Green Belt is where we relax, it's where we watch wildlife, it's where we take part in our hobbies, it's where we grow our food, it's where we eat and drink, it's where we feel inspired, it's where we make memories, and, importantly, it is where farmers graze their livestock and grow crops.
193. The image below shows the linkage between Green Belt restricted land and Sites of Biological Importance.

Extract: GMSF mapping showing Green Belt (light green) and Sites of Biological Importance layers (darker green). Red shows proposed allocations and yellow is the call for sites area in Bolton.



Green Belt Assessment, July 2016

194. CPRE has reviewed the Greater Manchester Green Belt Assessment, July 2016 produced by LUC. CPRE had not previously been engaged in this assessment and believes it would have been more transparent and beneficial for stakeholders across Greater Manchester to have been consulted on the robustness of the methodology of the Green Belt Assessment, and to understand that the parcels of land and boundaries appropriate, and to check that the field surveys had been accurately carried out.
195. With such extensive assessments it is possible when multiple team members are involved in site assessment for inconsistency in judgements, and human error, and database inaccuracy to alter the grading of sites in relation to the five Green Belt purposes. This is true for site analysis despite effort to cross-check and review to ensure consistency, clarity and transparency in all judgements. Second opinions and local knowledge can add greatly to the robustness and soundness of such information collation and interpretation.
196. To this end if justified it would be most important that each local authority undertakes an independent Green Belt Review, with adequate opportunity for local interests to make representations.
197. Crucially as shown earlier in the response CPRE believes the scale of development identified in the GMSF is much too high based on overly high jobs growth forecast and

flawed assumptions for the objectively assessed need and the way it has been translated into the housing requirement for each local area, without due regard to restricted land.

198. Exceptional circumstances have not been demonstrated or adequately justified. Brandon Lewis Minister of State for Housing Planner stated in his letter dated 7 June 2016 (see Appendix Two) that Government has put in the strongest protections for the Green Belt, and makes clear that Green Belt boundaries should only be adjusted in exceptional circumstances. Gavin Barwell Minister of State for Planning and Housing in his letter dated 24 November 2016(see Appendix Three) reiterated the need for exceptional circumstances and the important role of duty to cooperate.
199. CPRE agrees where exceptional circumstances have been identified that there would be a benefit in coordinating Green Belt release at a sub-regional scale to ensure most sustainable supply of land across the conurbation to deliver needed growth over a 20 year timeframe, but realism in the figures based on tenable assumptions and robust analysis is a basic requirement.
200. CPRE agrees it is necessary to take account of the following factors (not exhaustive):
 - the projected long term requirements for jobs and housing land, fully accounting for all brownfield land (short, medium and long term prospects) across the conurbation (meeting the requirements of the fifth purpose defined for Green Belts in NPPF) to properly justify exceptional circumstances; and
 - promotion of sustainable patterns of development (i.e. not entirely road based as with some proposed growth gateways and corridors), accounting for local, regional and national issues such as economic growth, health and wellbeing, accessibility and biodiversity, cultural heritage and climate change resilience, as well as an assessment against Green Belt purposes.
201. CPRE believes GMCA is still a long way from evidencing 'exceptional circumstances' needed to justify releases of land from the Green Belt. CPRE highlights that the relatively poor performance of a parcel of Green Belt land against the five purposes is not, of itself, an exceptional circumstance that would justify release of such land from the Green Belt. There must be a demonstrable requirement to accommodate development which could not be met elsewhere.
202. CPRE notes the possible outcomes of the assessment process could include the following:
 - reconfirmation of existing areas of Green Belt;
 - recommendations for inclusion of previously undesignated land as Green Belt;
 - recommendations for the inclusion of existing safeguarded land into the Green Belt;
 - recommendations for the release of existing areas of Green Belt for shorter term development; and
 - recommendations for the release of existing areas of Green Belt and their inclusion as 'safeguarded land' to allow for longer term development. This is land taken out of the Green Belt in this plan period for potential development in the

next plan period and protected from development proposals arising in the meantime by policies with similar force to Green Belt.

203. Furthermore to identifying potential Green Belt releases properly it is also necessary to consider:
- the total supply of brownfield land across the conurbation and in each of the ten different areas to ensure balanced policy and use of Green Belt to stimulate the re-use of previously developed land for needed development types;
 - will Green Belt parcel release harm neighbouring areas and their ability to meet the Green Belt objectives defined in NPPF. An evaluation of spatial options for any Green Belt releases to inform judgements is necessary;
 - will potential harm to adjoining areas of Green Belt result? Master planning can help in this regard, ensuring any urban extensions are properly planned with adequate green infrastructure.
204. CPRE notes the recommendations by LUC for planning for positive use of land in the Green Belt and note that this has not been adequately picked up in the GMSF. After all, the NPPF does encourage local planning authorities to secure positive use of land in Green Belts, once defined.
205. The assessment is deficient in that it lacks a detailed assessment of existing positive uses of land in the Green Belt. This is most important for this sub-regional planning layer to ensure best and most versatile land, Country Parks and other green spaces, and a large number of sports pitches and golf courses, moorland, woodland and the floodplains of a number of rivers are understood.
206. Approximately only three per cent of all farmland nationally has such high grading of soil as Best and Most Versatile Grade 1. CPRE argues no farmland of BMV1 should be developed. Under Section 11 of the National Planning Policy Framework, 2012 Paragraph 112 states that local planning authorities should take into account the economic and other benefits of the best and most versatile agricultural land. Where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality.
207. CPRE agrees there remains considerable scope to enhance the positive use of the Green Belt- particularly in terms of providing for informal recreation close to the conurbation.
208. CPRE supports LUCs recommendation that GMCA should develop a strategy to secure greater positive use of the Green Belt with the aim of enhancing the environmental and social benefits derived from this important area of open land, helping underpin the region's ambitious plans for economic growth and regeneration. This is in line with the recent research published by CPRE, see below.

Nature Conservation and Recreational Opportunities in the Green Belt

209. The *Nature Conservation and Recreational Opportunities in the Green Belt*¹³ report sets out nature conservation and recreational opportunities in the Green Belt. CPRE calls on the Greater Manchester Combined Authority to prioritise investment in Green Belts in the GMSF as new research¹⁴ published this month shows the huge potential of the Green Belt in terms of amenity and nature conservation.
210. Produced by environmental consultants ADAS, *Nature Conservation and Recreational Opportunities in the Green Belt* shows how Green Belt is particularly valuable in giving people access to the countryside and opportunities for recreation. It also shows how the woodland and wetland in Green Belt can be enhanced to help us mitigate climate change.
211. Given Green Belt's protected status, CPRE argues that we have the perfect case for investment in improving these vital public amenities. The new research shows that England's Green Belt provides urban dwellers with invaluable access to the countryside: 17% of public rights of way (including both public footpaths and bridleways) are within Green Belts compared with 13% in similar, non-Green Belt areas. Nearly half of country parks, a third of local nature reserves and one fifth of England's deciduous woodland can be found in the Green Belt.
212. ADAS' research also found that Green Belts include a significant proportion of 'priority habitats', endangered areas of wildlife and biodiversity that need conservation. The Natural Capital Committee recently argued that that more wetland and woodland on the edge of urban areas would do much to help the recovery of nature and fight climate change.
213. CPRE calls on the GMCA to:
- Prioritise investment in Green Belt in Greater Manchester as the health and well-being benefits of this are high.
 - Reiterate a commitment to protecting the Green Belt as a permanent area of undeveloped land when responding to the forthcoming Housing White Paper.
214. CPRE is also calling on GMCA to:
- Use regional park funding model in the GMSF.
 - Introduce long-term management plans in order to deliver enhancements to natural capital and recreational opportunities.
 - Market the Green Belt as a visitor destination in its own right.
 - Create new Green Belts in areas where the evidence suggests they will have most benefit (i.e. in addition to existing Green Belt, and not as a 'swap').
215. Green Belt openness and permanence enhances the natural environment and underpin GMSF Policies GM7, GM8, GM9, GM10, GM11, and GM12.

¹³ <http://www.cpre.org.uk/resources/housing-and-planning/green-belts/item/4452-nature-conservation-and-recreational-opportunities-in-the-green-belt>

Green Belt Summary

- 216. Exceptional circumstances required for Green Belt release have not been fully justified. Reasonable alternatives have not been adequately considered, as so much brownfield land exists and the prospect of constrained land being unlocked through brownfield pilots during the life of the GMSF properly assessed.
- 217. Saving existing, and creating new, Green Belt from development in the first instance is a clear priority.
- 218. CPRE is pleased to read that GMCA in Policy GM13 will retain Green Belt and will be afforded strong protection in accordance with the National Planning Policy Framework.
- 219. But CPRE calls on GMCA to more set ambitious targets for Green Belt protection and enhancement. There remains considerable scope to enhance the positive use of the Green Belt- particularly in terms of providing for informal recreation close to the conurbation. This should be a priority for Greater Manchester as the health and well-being benefits of doing this are extremely high.

Section 17 Recreation

Policy GM13

- 220. CPRE applauds the GMSF Policy GM14 intention to provide a wide variety of recreation opportunities, including outdoors, to support a high quality of life and promoting good health and the attractiveness of the sub-region to visit.
- 221. CPRE agrees that delivering an accessible and integrated network of high quality green infrastructure across Greater Manchester is most important. The quality of the natural environment is a key decision making factor when businesses and people choose whether to locate there. It is important for the natural environments in, and around, Greater Manchester to be as high quality, safe and attractive as possible. All new housing developments should have adequate high quality provision of outdoor recreation space for the benefit of residential amenity.
- 222. The CPRE published report [*Nature Conservation and Recreational Opportunities in the Green Belt*](#) shows how Green Belt is particularly valuable in giving people access to the countryside and opportunities for recreation. Key conclusions and recommendations should inform the GMSF with plans for improved local benefit with appropriate Green Belt uses.

Section 18 Carbon Emissions

Policy GM15

- 223. CPRE supports Policy GM15 on carbon emissions, but questions how it is possible to reduce Greater Manchester CO² emissions by 60% when so much new growth is planned in greenfield locations and so much expansion of aviation activities is being promoted. Air travel and air freight are the most unsustainable transport modes.

224. It might be useful to consider carbon emissions in terms of per capita, rather than absolute. Clearly an absolute reduction in CO² is what is really needed, but if the population increases, then a steady state CO² per capita will still produce an increase in emissions; and a reduction per capita could produce steady state absolute. The crucial issue for the GMSF is that, even when done on such a large scale as this, new development is a small proportion of what already exists; so if spatial planning is to produce an absolute reduction in emissions then the CO² strategy of the new development needs to be quite significantly carbon negative, and therefore transformative for the whole of Greater Manchester. Anything less than that will not produce a reduction in CO² or improved air quality.
225. We agree that sustainable modes should underpin development, but the majority of employment and housing development in the GMSF is focused at six key gateways, which are predominantly road and motorway based. The GMSF must put more emphasis on the need for public transport networks.
226. We completely agree that new development must accord with the energy hierarchy to manage a reduction in per capita energy consumption. Existing development should be retrofitted. More tree cover and an increase in habitats that sequester and store carbon are important and the GMSF policy must make an effective contribution in this regard.

Section 19 Resilience

Policy GM16

227. CPRE is supportive of Policy GM16 concerning Greater Manchester being highly resilient. It is right GMSF has policies to protect against acute shocks such as flooding and chronic stresses, such as aging infrastructure.
228. However, CPRE believes the scale of greenfield development proposed in the draft GMSF is the wrong direction of travel for this policy aim. As flooding stands out as a key threat, it is important not to concrete over natural environments that soak up and hold rainwater from flooding areas lower down the catchment area.
229. Of course, we wish Greater Manchester well with the United Nations 100 Resilient Cities Network initiative.

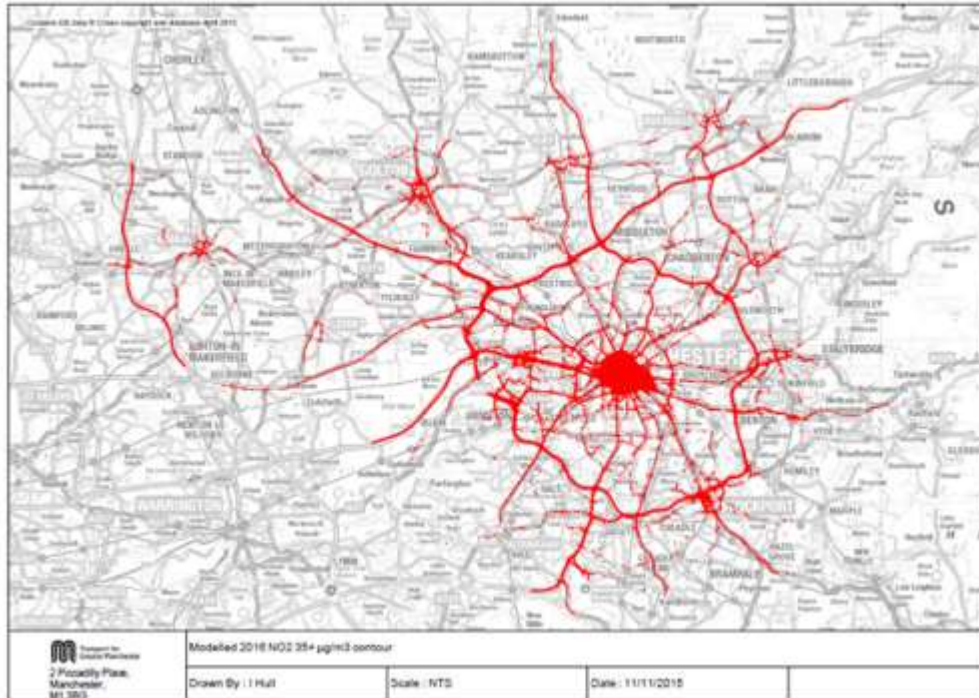
Section 20 Air Quality

Policy GM17

230. CPRE is supportive of Policy GM17 as it is essential the air quality of Greater Manchester is significantly improved. Pollution from road and air traffic is the most significant cause of poor air quality in Greater Manchester. The two pollutants of most concern are nitrogen dioxide (NO₂) and particulates less than 10 microns. (PM₁₀). However, we are puzzled as to how Greater Manchester believes it will control its air quality in view of the scale of aviation expansion and the number of road enhancements that are proposed in the GMSF.

231. The UK has one of the highest levels of premature deaths from nitrogen dioxide in the EU, according to the European Environment Agency's report, Air Quality in Europe, launched on November 23rd, 2016.
232. Below is the most recently published version of Greater Manchester's Air Quality Management Areas (AQMAs). It is a shameful image and, in view of it, it is difficult to comprehend how GM can be seriously considering adding to its highway capacity.

Greater Manchester's Air Quality Management Areas (AQMAs), November 2015



233. Areas must not be planned to exceed air pollution limits and this may have implications for those gateways identified that already have significant air contamination issues. Will concreting over the 'green lung' of Green Belts help GMCA achieve cleaner air? CPRE believes not.
234. To highlight the point, a recent high court challenge by ClientEarth against the Secretary of State for the Environment, Food and Rural Affairs demonstrated that air quality in some areas is so bad that it is unlawful. It is a cause of many deaths and it blights the health of millions. Mr Justice Garnham gave the Government until 24 April 2017 to produce a draft plan and 31 July to deliver a final plan. He also granted ClientEarth permission to go back to court if there were any further problems with the draft plan, which seeks to reduce levels of nitrogen dioxide (NO₂) as quickly as possible.
235. CPRE believes Greater Manchester must benefit from a clean air plan in anticipation of the national network of clean air zones which must be part of the Government's response to this issue. Housing developments must be based on 'walkable' neighbourhoods. Employment zones must enable a modal shift of transport to rail and water. Will this be achieved by those employment zones identified by the GMSF?

236. Air quality issues must be fully tackled by GMCA to protect Greater Manchester people from toxic and unlawful air pollution in the future and we would point Greater Manchester to commitments made recently by Athens, Madrid,, Mexico City and Paris - all of which have promised to go 'diesel free' by 2025.

Section 21 Flood Risk and Water Quality

Policy GM18

237. CPRE is supportive of Policy GM18 and we already campaign for upland management techniques to slow the run-off of rainwater by measures such as peat bog restoration, contour ploughing and good land use planning.
238. Sustainable urban drainage schemes are a key requirement of new developments. Naturalising rivers is welcomed where appropriate. The issue of the Environment Agency reducing its responsibility of pumping water must be considered.
239. The important drainage role of the Manchester Ship Canal must also be recognised. The quality of the water discharged must not negatively impact on the quality of bathing waters on the coast of Merseyside, Cheshire and Lancashire.
240. Development of Green Belt land will increase run-off to local water courses and CPRE believes this is an important consideration and further justification as to why many of the Green Belt sites proposed for release should be retained to diminish the risk of future flooding.

Section 22 Design

Policy GM19

241. The design of new development should take account of local distinctiveness, character and history, therefore CPRE is supportive of Policy GM19.
242. The NPPF is strong on the importance of good design (NPPF Section 7 para.56-68). The GMSF should focus on good design to create more positive environments that are good to be in and experience. Viability and quality are not mutually exclusive. High quality design is likely to result in a more desirable and therefore more long lasting and sustainable development than poorly designed developments. CPRE recommends codified design standards.
243. Good design also provides a way of reconciling high density development with the need to fit with the character of existing areas. Well designed, high density development can be attractive as well as contributing to sustainable development by making efficient use of land.
244. CPRE would recommend that the maximum densities are achieved so Greater Manchester grows upwards to limit outward spread as much as possible.

- 245. Neighbourhood plans provide scope for recognising and promoting the importance of local townscapes and villages. The Government keeps reiterating its commitment to them as a means of localism being achieved in planning decisions.
- 246. Responding to development proposals provides an opportunity to reinforce this. CPRE is therefore surprised not to see a single mention of Neighbourhood Plans in the entire draft GMSF.
- 247. Greater Manchester should achieve a higher quality of life for inhabitants and workers through the improvement of its built and natural landscapes and the policies of GMSF must ensure the delivery of good quality of design for both Local and Neighbourhood Plans.

Section 23 Heritage

Policy GM20

- 248. The historic environment is a key cultural reference and an irreplaceable resource, CPRE is therefore supportive of Policy GM20. We believe that the heritage of rural places is equally important as that of urban places.
- 249. New development should seek harmony with the old and a positive approach by GMSF to the historic environment is important. The NPPP in Section 7 on design issues is important as the heritage of an area is often the foundation of local distinctiveness and sense of place. The NPPF provides guidance that new development should reflect character, history and local identity.
- 250. This is reinforced by outlining how design should take into account the scale, density, massing, height, landscape, layout and materials of the local area in order to enhance local distinctiveness. In setting this out it is not intended that new design is stifled, but rather that new development should respect and complement what already exists. Master-planning can help protect and enhance local heritage.

Section 24 Education, Skills & Knowledge

Policy GM21

- 251. CPRE is supportive of Policy GM21 to capitalise on the high concentration of higher education institutions and other training and skills development assets.
- 252. CPRE supports fair employment conditions, and calls for employers and organisations working across the full range of economic sectors to support upskilling with a corresponding rise in wages and standards of living in all areas, particularly rural areas that have been adversely impacted by globalisation and new farming practices requiring fewer people employed in the agricultural sector.
- 253. Farm diversification can have a positive impact on the important food and drink sector and GMSF policy should support rural jobs.

Section 25 Health

Policy GM22

- 254. CPRE is supportive of Policy GM22 to improve the health of Greater Manchester people and to reduce health disparities across the area.
- 255. Sustainable development is the crux of improved health. Pollution from vehicles must be reduced by limiting the need to travel. By developing urban brownfield sites and creating walkable neighbourhoods, health will improve as air and water contamination is reduced.
- 256. Keeping Green Belt 'green lungs' undeveloped is most important to the GMCA achieving this aim for the sub-region.

Section 26 Social Inclusion

Policy GM23

- 257. CPRE is supportive of Policy GM23, which aims for the development of Greater Manchester to be managed so as to maximise the ability of all people to share in the benefits of its economic growth and prosperity.
- 258. Everyone in Greater Manchester has the opportunity to spend time in the countryside. It is free to access and provides families recreation and leisure benefits, therefore countryside loss must be minimised.
- 259. Depressed urban environments must have their fortunes reversed by being the target of investment in new jobs and homes.

Section 27 Infrastructure

Policy GM24

- 260. CPRE is supportive of Policy GM24 to ensure a co-ordinated and integrated approach to infrastructure planning and delivery will be taken. Successful delivery of the GMSF relies on adequate provision of transport, utilities, social and telecommunications infrastructure.
- 261. The past track record of developers honouring previously agreed planning obligations could be considered when future planning applications are decided.

Section 28 Allocations

Policy GM25

- 262. CPRE supports the need for master-planning to steer urban extensions, and the provision of adequate infrastructure especially affordable housing in more rural areas should be a minimum requirement to develop land. Developer contributions agreed as part of planning consented should not be renegotiated out of by developers at a later stage.
- 263. CPRE is particularly pleased to read GMCA will expect developments to be delivered in a timely fashion, and if not will use new Mayoral CPO powers to ensure needed new development does happen.
- 264. CPRE welcomes the commitment that development in proximity to Green Belt protected land must minimise harm with the use of landscaping and the creation of strong defensible boundaries. Similarly we are pleased that development close to heritage assets must respect features and qualities that protect local character.
- 265. CPRE is also pleased to note the determination that development must mitigate flood risk, provide surface drainage and sustainable drainage methods.
- 266. CPRE supports the adherence to policies of the Greater Manchester Joint Minerals Plan.
- 267. In addition to the A to F requirements, CPRE would also recommend the use of minimum Green Infrastructure criteria to ensure all residents and workers in new development have access to public footpaths/greenways linked to natural green space.
- 268. Below we comment upon a number of sites that from our own understanding will cause significant adverse planning harm and that have also been highlighted as problematic by concerned local residents. We contend that if the GMCA would concur with our demographic expert's housing calculations and our arguments regarding employment land allocations, then many of the least sustainable Green Belt sites proposed for development could be dropped from the GMSF altogether and the size of many others could be reduced.
- 269. CPRE would like the opportunity to speak on issues for each site in the GMSF as appropriate at examination.

28.1.1 AG1 Airport City South

- 270. CPRE has no option but to recognise that a substantial area of Green Belt around Manchester Airport was classified as an Enterprise Zone by the former Chancellor. Being realistic, therefore, we also recognise that this designation is not likely to be revoked any time in the near future.

271. For the record, however, CPRE would like to highlight that it is not in the spirit of good planning and it is not democratic for large areas of Green Belt to be arbitrarily designated as Enterprise Zones (EZs) without a proper Green Belt review and without deferment to wider stakeholders who have been properly consulted.

Photograph taken of greenfields that will be built at this proposed allocation



272. Justification for our opposition: If we had been given the opportunity to comment on the proposition of establishing an EZ at the airport prior to any decision being made, we would have not only raised issues relating to sustainability, Green Belt, loss of farmland and air quality, but we would also have pointed to (a) the recommendation by the panel which sat in judgement on the Regional Spatial Strategy that there should not be a commercial hub at the air[ort because it would draw business away from Manchester and surrounding towns and (b) a 2011 CPRE report that looked at the concept of locating an Enterprise Zone at Manchester Airport and which tabled evidence to show Enterprise Zones tend to draw businesses from other locations in the same wider area and they do not have a lasting legacy¹⁵.

28.1.3 AG3 Timperley Wedge, Davenport Green (Trafford)

273. Timperley Wedge stretches west from Davenport Green adjacent to the M56, near the Airport towards Altrincham.

¹⁵

http://search.aol.co.uk/aol/search?rp=&s_chn=hp&q=CPRE+enterprise+zones&q=CPRE+enterprise+zones&it=aoluk-homePage50&page=2&oreq=96629edad1fe474ab69d713f5f880fd0&v_t=aoluk-homePage50

274. Earlier in this response we comment about the Airport and its limit in role and expansion. This was a view taken by the panel which sat in judgement on the now revoked North West Regional Spatial Strategy - that there should not be a special hub/attractor at the airport. It should serve its prime purposes only.

Image taken from Roaring Gate Lane of fields that make up this allocation



275. CPRE believes this site should not be considered for development as it is an important Green Belt site stopping the merging of distinct places and provides an immensely important local green space.
276. There are biodiversity issues here and flood risk issues to be considered.
277. CPRE notes the suggested high level of green infrastructure along Timperley Brook maintaining the separation of settlements and recognising the high biodiversity and recreation value of this corridor, but in reality we think it will not outweigh the significant harm of developing this important green space.
278. For these reasons this is not a suitable site to be released from Green Belt.

28.2.2 WG2 Western Cadishead and Irlam

279. CPRE is opposed to the development of Green Belt land south of the M62. The key issues are wildlife protection at Cadishead Moss Nature Reserve, high grade farmland, and air quality issues.
280. Cadishead Moss nature reserve has important purposes of storing carbon in the peat moss and providing hydrological functions to wider Chat Moss. We understand that the

site is part of the Greater Manchester Wetlands Nature Improvement Area that overlaps the Lowland Wetlands landscape scale natural asset.

Photograph of the proposed site taken from Astley Road, Irlam



281. The land is in agricultural use (lawn turf) and the soil is regarded as high grade (Best and Most Versatile Grade 1) and should not be built. As previously stated local planning authorities should take into account of best and most versatile agricultural land and avoid development of it.
282. For these reasons this is not a suitable site to be released from Green Belt.

28.3.5 NG3 Junction 21 of M62 (Oldham and Rochdale)

283. Newhey is a Pennine Township village in the Borough of Rochdale on the border with Oldham. Local residents are concerned about the harm to residential amenity and the merging of two distinct places on either side of the Oldham and Rochdale borders. Is the topography of this site suitable due to the impact of long-range views of development in the countryside?
284. The village has Junction 21 of the M62 connected to it, where this swathe of green belt is located. The site is proposed for a large scale mixed use development comprised of 1,400 dwellings and 4446,000m² of employment development. Presently the site is used as farmland, wildlife habitat of biological significance and is criss-crossed by numerous Public Rights of Way. Tree plantations on the side of Whitfield support local wildlife, birds and animal habitats and plant life and residents fear that losing these to development would be detrimental to the ecology of the area.

Photograph of the Green Belt site taken from fields in Newhey



- 285. CPRE understands that Rochdale developed the Kingsway Business Park in proximity to the M62 junction 21 which was first opened nine years ago and is still half vacant.
- 286. There is an identified daily (morning, afternoon and evening) congestion of M62 motorway, main A640, A663, A671 roads and total gridlock of Newhey village. There are concern that the addition of further development of such a large scale will cause even more congestion of the motorway and local road network.
- 287. Due to the persistent standing traffic air quality suffers and people have associated health problems such as respiratory conditions. The proposed development would be higher than the motorway and there are concerns that the health of the people in the new housing would suffer.
- 288. Noise pollution is also considered a problem.
- 289. Flooding of the River Beal is an issue in Newhey in recent years and the neighbouring village of Milnrow.
- 290. In the past year 70 new houses were brought forward on a brownfield site in the centre of the village. CPRE is pleased that this site was brought into use, however additional infrastructure is needed to cope with the additional demands.

291. Green Belt provides an important function of keeping two distinct townships from merging on the border of Rochdale and Oldham. It is an important green lung for an area with poor air quality associated with the traffic problems.
292. For these reasons this is not a suitable site to be released from Green Belt

28.4.2. EG2 Bredbury Park Extension

293. CPRE is strongly opposed to the development of this 38 hectare Green Belt site due to the detrimental impact on the Green Belt between authorities of Tameside and Stockport.

Photograph of the Green Belt site taken eastwards from the A6017



294. The existing industrial park at Bredbury is vacant. CPRE considers it illogical and environmentally damaging to create an extension to the existing one.
295. The proposed development would extend into the Tame river valley with adverse impacts to and which further erodes the Green Belt between Stockport and Tameside. This allocation is contrary to draft GMSF Policy GM12 as it would not retain the open character of the Tame river valley
296. CPRE agrees enabling people safe access to the river valley as traffic-free access is a welcome relief to urban dwellers.
297. For the reasons set out CPRE objects to this proposal.

28.5.3 ELR3 Pocket Nook, Lowton

298. CPRE is aware that too much employment space is being planned. Wigan also has significant brownfield land reserves that have not been fully included in the GMSF process.

Photograph of the Site looking north from A580



- 299. Neighbouring St Helens Council is progressing its local plan with large scale development proposals for Green Belt of Newton and Haydock. Other development proposals include a single huge logistics development, and three other developments on the Haydock industrial estate at Penny Lane, Florida Farm, and other two logistic sites at Parkside that will be larger than the town of Newton-le-willows and Earlestown combined. It is understood that there are also proposals for the eastern side of the M6 as a Strategic Road Freight Interchange (SRFI) and the western side as warehousing.
- 300. Exceptional circumstances are not justified.
- 301. The road infrastructure in Lowton is already struggling and such as scale of HGV movements from a development of this scale would cause considerable congestion.
- 302. There is a known flood risk at Carr Brook. We note GMSF acknowledge the two areas close to Carr Brook in the north of Pocket Nook are priority zones for groundwater protection, and therefore appropriate measures and restrictions will need to be in place should the site be allowed for development
- 303. For these reasons this is not a suitable site to be released from Green Belt.

28.5.4 ELR4 South Pennington (Wigan)

- 304. CPRE has concerns about this low-lying site, which is frequently liable to fog. We strongly object to the release of this site as it fulfils a primary green belt objective by preventing urban sprawl between Leigh and Lowton. The remaining 'green strip' adjacent to the Atherleigh Way (A579) is not adequate in scale to form a defensible parcel of Green Belt providing open views extending in all directions. Development of this land would amount to urban sprawl and encroachment into open countryside.

305. Air pollution from road congestion is already a serious issue in the low-lying area, which is evidenced to fog frequently.
306. There is a flood risk from surface water to the local grid identified by the Environment Agency, and concerns about the local pumping station close to the area that is currently under review. It moves surface water into Pennington Flash/Brook. There are ground water source and air quality considerations. The site is part of the ecological network of the Wigan flashes with records of priority species. There is also a well-trodden network of public footpaths.

Image taken of site from A580 East Lancashire Road to the south



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

28.6.2 M61C2 Hulton Park and Chequerbent (Bolton)

308. CPRE Lancashire is aware that there are already speculative applications being vigorously pursued at the Hulton Park and Chequerbent area, east of Westhoughton on Green Belt land that separates the distinct boroughs of Bolton and Wigan.

Image taken from the A6 to the east towards Bolton Football Stadium



- 309. Previous development applications have been refused, but developer interests just will not take 'No' for an answer. It is very important that the GMSF should not become a vehicle for overturning local decision making, and that local councillors are able to exercise their democratic roles. This issue raises the important role of democracy in the GMSF process.
- 310. CPRE recommends this site should be maintained as Green Belt land due to the important purpose it serves.

28.7.1 M6C1 Junction 25 (Wigan)

- 311. The proposal for a substantial employment development in the M6 corridor, would incur the loss of Green Belt designated land currently used for agriculture. There are flood risk issues. The M6 is already congested and has air quality issues causing a high incidence of respiratory conditions in the local community. The area is well used by local people for recreation with a network of accessible public rights of way.
- 312. The reallocation of this land was rejected by the local plan examiner in 2013. The examination report highlighted Green Belt issues and the adverse impact of urban sprawl, the amount of available local brownfield sites and therefore the lack of exceptional circumstance. The absence of a two-way access was also highlighted.
- 313. Wigan has one of the largest amounts of brownfield land in the country and it is part of the Government's Brownfield Pilot Register. There isn't an exceptional circumstance in Wigan to justify Green Belt release. Brownfield land must be fully considered in advance of Green Belt land loss.
- 314. CPRE is concerned that there is a serious and significant cumulative impact of a number of employment sites along the M6 Corridor being progressed by the GMSF (28.7.2 M6C2 Junction 26) and in Wigan and neighbouring authorities including St Helens (Florida

Farm, M6 Junction 23), Chorley, Bolton and also by speculative developers jumping on the logistics bandwagon.

315. CPRE advocates more joined up thinking with so much harmful employment development being rushed through the pipeline in advance of the GMSF. There has been concern expressed by local people that local authorities are keen to consent employment developments due to business rates and Government funding cuts in the future, irrespective of potential planning harm. All of the developments being planned or speculatively led are road based and involve the loss of greenfield land, currently in agricultural use, most of it Green Belt. Much of the area has sprawled into countryside.

Images taken from Dummers Lane to the north



316. CPRE recommends that GMCA must ensure it has complied with its duty to coordinate the job based development and we urge that this site should be maintained as Green Belt land due to the important purpose it serves.

28.8.1 OA1 North Bolton Strategic Opportunity Area (Bolton)

317. CPRE has concerns about this broad area of search for housing within Green Belt North of Bolton. First is the issue of exceptional circumstance and whether it in fact exists. There are many brownfield sites locally. The second is the important purpose that the green areas provide in limiting sprawl into the countryside north of Bolton between the Blackburn with Dawen boundary.
318. Looking at land at Horrocks Fold and Belmont Road/Templecombe Drive for example, we are aware of the regular flooding as the area is part of the natural drainage area of Winter Hill. The ground is often water-logged. The area neighbours three Sites of Special Scientific Interest at West Pennine Moors, Longworth Clough, Gale Clough and woodland designated as a Site of Biological Importance with deer, bats and owls present.

Image of part of the site taken from Belmont Road/Horrocks Fold north



319. There are no new jobs in this area. There are also problems of local road network capacity. Local services are over-subscribed with shortage of school place and GP places.
320. The area provides an immense recreational resource with walking, horse-riding and fishing for the people of Bolton and beyond and ought not to be sacrificed so readily.
321. It is unknown whether or not the timing of the declaration by Natural England (NE) of 76 sq. km. of the West Pennine Moors as a new Site of Special Scientific Interest (SSSI) in mid-November 2016 was directly connected with the development aspirations of the GMSF or not. However, NE's press release, lauding it as "*the largest new protected wildlife site in a decade*"¹⁶ came out in mid-November just after the Draft GMSF was published declaring a massive new "Strategic Opportunity Area" for development that abutted the moors. (The GMSF consultation opened on October 31st 2016).
322. Justification for our concern. The West Pennine Moors comprises a total of 230 sq. km (approx. 90 square miles) of uplands, reservoirs, wooded valleys and historic villages that spread over north west Greater Manchester and the southern rural parts of Chorley and Blackburn with Darwen. The fact that Natural England has declared a third of it to be an SSSI confirms it is a special area that should be protected. If there is some new development on the north side of Bolton, it should not be of a scale or design that would compromise the West Pennine Moors. There is a statement to this effect in the reasoned justification but it is of concern that this 'Strategic Opportunity Area' is only loosely defined in the Draft GMSF.
323. CPRE recommends this site should be maintained as Green Belt land due to the important Green Belt purpose it serves.

¹⁶ <https://www.gov.uk/government/news/west-pennine-moors-becomes-largest-protected-wildlife-site-in-a-decade>

28.8.8 OA8 Broadbent Moss (Oldham)

324. CPRE objects to the proposed allocation of this area for development.

Image of the Broadbent Moss Site Taken from Cop Road, Oldham



325. Justification. Quite apart from its Green Belt designation and the large number of public rights of way and recreational routes that cross this land, the majority of the Broadbent Moss area is entirely unsuitable and unsustainable for development. It is an ecologically important area of peat, ponds and mosses (including the increasingly rare sphagnum moss), part of which is wooded and much of which is subject to flooding. The Lancashire Wildlife Trust also raise the significance of this site (and others) in their response to the draft GMSF. The entire area around the River Beal is a flood plain.
326. It should not be a matter of making promises to “protect and enhance existing biodiversity where appropriate, including the Site of Biological Importance at Royton Moss”. The area was designated as ‘Other Protected Open Land’ for a reason. It must retain its special designation and it should never be built upon.

28.8.12 OA12 Robert Fletchers (Oldham)

327. CPRE strongly objects to this site being included in the GMSF. As a Peak District National Park gateway site the land should not be 120 dwellings and 100 holiday lodges. In National Park Planning Policy context the proposal is unsound.
328. The proposal would also have significant adverse impact to Green Belt purposes.
329. Primarily because of National Park and Green Belt designation, this would prohibit development of permanent structures. For clarity, less than half of the site is in fact

previously developed. There are significant visual landscape impact from both near and afar. Flood risk is an issue for the land identified.

330. We are aware that in the recent past there was interest in a community-led hydro scheme for the reservoir. If the site is progressed CPRE hopes something more innovative such as a community-led hydro scheme, with eco-housing/self-build/micro-businesses on the mill site could be included and the greenfield part of the site retained as green space. CPRE highlights this is a very landscape sensitive area and must be planned for accordingly. Friends of the Peak District have submitted separate comments concerning this site due to harm to the Peak District National Park.

Image of land to west of Dovestone Reservoir in the Dovestone Valley



28.8.13 OA13 Bamford/Norden (Rochdale)

331. This land is currently operational farmland with part used as playing fields where local children play sport weekly.
332. The area is used for a range of recreation and leisure activities including walking, cycling and horse-riding.
333. The site is earmarked for 750 executive homes at a low density. CPRE queries whether the associated high skilled jobs been created locally? If the answer is no then these houses will support commuting patterns to further parts of the conurbation, which is unsustainable.
334. CPRE is concerned about the site sustainability as public transport to the site is poor.
335. The site has drainage issues, which could cause flooding risks.

Image of Bamford/Norden Site taken from Norden Road



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

28.8.2 OA2 - Elton Reservoir Area (Bury)

337. The majority of land within this area is currently in agricultural use.
338. The water features of Elton and Withins Reservoirs have ecological value, especially bird life, which must be protected and enhanced.
339. This green area is an important 'green lung' and has some public footpath access and there is further potential for more recreation and nature conservation opportunities if left undeveloped.

Photographs taken of livestock and where they feed at the Elton Reservoir site



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

341. There are flood risk issues, and local residents have had homes flooded in recent years. There is concern the development of more soak-away land will add to the problem of localised flooding.
342. For these reasons this is not a suitable site to be released from Green Belt.

28.8.20 OA20 Woodford (Stockport)

343. CPRE objects to GMSF's plan for an 'Opportunity Area' for 2,400 houses in Green Belt at Woodford which would make a major contribution to the collapse of the Green Belt in this area.

Image of flooded land taken from Church Lane



344. Justification: This strategic site would adjoin and partially surround an existing development of 950 houses that is under construction on the former British Aerospace site. However, it is important to appreciate that this is not all that is in the pipeline for this immediate area. The border with Cheshire East runs through the British Aerospace site and so does the northern end of the proposed Poynton Relief Road (PRR) which Stockport MBC and Cheshire East Council have just given planning consent. Cheshire East Council have proposed in their Local Plan, which recently went through an examination in public, that the PRR should be used to open up development land in Green Belt in Poynton and Adlington. Together these proposals would close up the Green Belt between settlements in Stockport and Cheshire East and allow Greater Manchester to sprawl into Cheshire.

345. This is not all. The cumulative impact is in fact even greater in this respect because site OA 20 Woodford almost meets up (except for one tiny field) on its western tip with the eastern boundary of the new North Cheshire 'Growth Village' at Handforth East proposed by Cheshire East Local Plan. (see our comments on OA22 Land off A34). This envisages 1,650 houses now (plus commercial premises) and safeguards a further 14 ha. of land along the Cheshire East/ Stockport border.
346. The proposed Woodford site is currently used by a number of small holdings, farms and equestrian businesses which contribute to the local rural economy. There are a number of well used Public Rights of Way enjoyed by ramblers, birdwatchers, cyclists and horse-riders.
347. There are existing congestion and air quality issues to be resolved. Further development would worsen existing problems.
348. There are drainage issues associated with the types of soils with impermeable clay, patches of glacial boulder clay, running sand, and peat, with areas liable to flooding and subsidence. Part of the area were previously used for tipping.
349. The 238 hectare site fulfils Green Belt purpose and if built it would represent a significant incursion into Green Belt of Stockport.
350. For these reasons this is not a suitable site to be released from Green Belt.

28.8.21 OA21 High Lane (Stockport)

351. This site, currently used for agriculture, is proposed for 4,000 dwellings on Green Belt, adjoining a village of just 2,000 homes. This would be the biggest single housing development in the entire plan and therefore its potential impacts are extensive. These include adverse traffic impacts to the Peak District National Park.
352. The local road network already suffers congestion and associated negative impacts on air quality, especially along the A6 corridor. The proposal would clearly exacerbate the problems that local residents already face.
353. Public transport services are not adequate and cuts to local authority budgets have stopped some services connecting this area altogether. More sustainable locations already served by existing public transport services need to be identified to combat the needless urbanisation of this part of the conurbation.

Image of High Lane site taken from Windlehurst Road



- 354. CPRE believes an important factor is that Stockport needs a thorough assessment of all its brownfield land resources, and a thorough and publicly transparent assessment of the viability of stalled sites with extant permissions for residential use. This would help to understand if developers are purposefully land banking sites to trigger consent on greenfields that would otherwise remain as open countryside.
- 355. Such a large scale of housing would take decades to build. If this scale of site is to be progressed, it would need a well thought out masterplan to ensure a proper phased release of land over the longer term.
- 356. CPRE understands that a large number of Stockport councillors are opposed to this development.
- 357. CPRE believes this site should be taken out of the GMSF as exceptional circumstances do not exist. Friends of the Peak District have submitted separate comments concerning this site due to harm to the Peak District National Park.

28.8.21 OA22 Land off A34 (Stockport)

- 358. Further to our comments on OA 20 Woodford (Stockport), CPRE objects to the proposal for “upwards of 3,700 dwellings” in Cheadle Hulme, adjacent to the North Cheshire growth village planned by Cheshire East at Handforth. The two sites lie diagonally opposite each other on either side of the A34. The inspector’s report on the Cheshire East Local Plan has yet to be published but, on January 2nd, 2017, the DCLG announced an expansion of its ‘Garden Villages Programme’ and it included Handforth East.
- 359. Justification: This is an area where the Green Belt is particularly fragile. If OA 22 goes ahead as well as the Handforth East village and OA 20 goes ahead as well as Cheshire

East's development proposals and the Poynton Relief Road, it means that the Green Belt in South East Manchester will, effectively, have been eroded. This lack of strategic joined-up planning is simply not acceptable.

Image taken of site from Griffin Lane



28.8.25 OA25 South Tameside

360. This proposed Green Belt site in three parts at Hyde Hall Farm, Denton is part of the Tame river valley.
361. Previous planning applications at the site have been refused on the basis that special circumstances to release Green Belt were not proved and a planning appeal in 2006 upheld the refusal for genuine material planning considerations. Contrary to this, the amount of land identified in the draft GMSF as being suitable for nearly 1,000 houses a higher number than previously proposed for development. CPRE highlights that the material planning considerations for refusing development here still apply.

Image taken of site from Apethorn Lane



362. As a consequence CPRE objects to this three part site allocation.

363. CPRE would recommend that that opportunities for active travel and recreation around National Cycle Route 62, quiet lanes, footpaths and the Peak Forest Canal are still pursued for the benefit of local residents.

28.8.26 OA26 Mottram M67 North and South

364. CPRE objects to the two allocations due to impact upon the Peak District National Park, Green Belt (in the case of the north part of the site) and due to unsustainable traffic impacts of both parts of the site.

Photograph taken from the A57 south of the north part of the site



365. These allocations would require significant transport improvements which are given GMCA's policy support (Policy SL7 Eastern Gateway; Policy GM6 Accessibility). As previously stated we object specifically to the inclusion of the Mottram Tintwistle Bypass and the trans- Pennine Tunnel, due to additional road capacity increasing the number of car trips.
366. Rather than focusing on road building, GMCA should follow the conclusion of TfGM in its draft 2040 Vision for Transport para 315 that '*There is a need to work with neighbouring authorities to provide high quality, high capacity sustainable transport alternatives in order to relieve pressure on the highway network*'. We therefore urge GMCA to reconsider how these road schemes fit with its spatial framework and remove support for both schemes.
367. In National Parks environmental quality should be the primary criterion in the planning of road and traffic management. Any investment in trunk roads should be directed to developing routes for long distance traffic which avoid the Parks. Friends of the Peak District have submitted separate comments concerning this site due to harm to the Peak District National Park.

Appendix 1 Demographic Appraisal by Piers Elias, Independent Demographer

Draft Greater Manchester Spatial Framework

Demographic Appraisal

on behalf of the

Campaign to Protect Rural England

By Piers Elias

Independent Demographer

16 December, 2016

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1. *Piers Elias - Personal Biography*

- 1.1. Piers Elias has a joint honours degree in Mathematics and Economics (Loughborough, 1981-84) and has over 21 years' experience in Local Government working for the Tees Valley Joint Strategy Unit and then the Tees Valley Local Enterprise Partnership (now Tees Valley Combined Authority) providing demographic insight and projections for school rolls, electors for ward reviews, household, population and labour force projections for Local Plans and the Tees Valley Strategic Economic Strategy.
- 1.2. He currently works as an independent demographer providing advice and guidance on a range of demographic issues including projections and methodology - his website can be viewed [here](#)¹⁷. He has an excellent working knowledge of the POPGROUP software, having been a user since 2006 and worked briefly for Edge Analytics, the current licence holder, in 2015.
- 1.3. During his time in Local Government he sat on Office for National Statistics (ONS) working groups for small area estimates, Local Authority population estimates and Census definitions. He was also the Local Authority lead on the Central and Local Information Partnership (CLIP) Population sub-group for 10 years and is well versed in ONS methodology.
- 1.4. He is a strong supporter of the Census and was the Local Authority representative for the Independent Working Group on the future of the Census¹⁸ and also represented Local Government at a Public Administration Select Committee (PASC)¹⁹ and at a Parliamentary Office Science & Technology (POST) seminar²⁰; this lobbying helped in securing funding for a 2021 Census. He sat on the Census Advisory Group as a Local Authority representative for six years.
- 1.5. He is currently vice-president of the British Society for Population Studies and has recently been re-appointed to the CLIP Population sub-group, acting as an independent advisor. He also acts as grants assessor for the Economic and Social Research Council.

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2. *Introduction and Background to the Report*

- 2.1. This report is written on behalf of the Campaign to Protect Rural England (CPRE) North West Regional Group, Lancashire and Cheshire Branches of CPRE and Friends of the Peak District, which is a CPRE-affiliated body. It constitutes a response to the consultation on the Draft Greater Manchester Spatial Framework, released on 31st October, 2016. The report considers the demographic factors that have gone into the policy off Objectively Assessed Housing Need (OAHN) and into the Policy on housing target with a view to assessing the integrity of the inputs and the plausibility of the outputs from a demographic view-point.
- 2.2. The first part of the report (Chapters 4 to 9) looks at the trends that feed into the policy off scenario (OAHN) and considers how the latest estimates and projections, from both the Office for National Statistics (ONS) and the Department for Communities and Local Government (DCLG), have impacted on the projections in the Draft GMSF Report (published October 2016) in terms of OAHN. These were originally

¹⁷ www.demographicssupport.co.uk

¹⁸ <http://popgeog.org/beyond-2011-independent-working-group/>

¹⁹ <http://www.parliament.uk/business/committees/committees-a-z/commons-select/public-administration-select-committee/news/future-of-the-census-1/>

²⁰ <https://www.parliament.uk/documents/post/The%20future%20of%20the%20Census%2025%20Nov13,%20POST%20flyer.pdf>

based on 2012 data (published November 2015) but have been updated with data from 2014 estimates and projections.

- 2.3. The second part of the report (Chapters 10 to 13) looks at how the Policy on housing target is built up and at the jobs led projections which were provided by Oxford Economics (OE).
- 2.4. Whilst consideration has been made in the Draft GMSF Report for the latest SNPPs and SNHPs (both 2014 based), no consideration has been made for the latest Mid Year Estimates (MYEs) from ONS which are 2015 based.
- 2.5. The report will also look at the migration changes up to and including data to Mid 2015 both in terms of moves wholly within the Greater Manchester area, but also moves between the Greater Manchester area with the rest of the UK and the rest of the world (international migration).
- 2.6. Trends from the latest figures on National Insurance registrations for non-UK residents, GP registrations for overseas nationals and births to mothers born overseas will be assessed to see if any recent trends are changing.
- 2.7. There are no demographic data yet available to be able to analyse the impact of the Brexit vote; the first indication on international migration will not be until early March 2017 when ONS publish their figures for Long Term International Migration (LTIM) for the year to September 2016, which will include one quarter's worth of LTIM following the vote (June 23rd, 2016). A full year's worth of LTIM data will not be available until December 2017 (Year to June 2017). Figures released on 1st December, 2016 showing estimates of flows for the year to June 2016 (which will form the basis for the 2016 MYEs) reveal that international migration was at a similar level to the year ending in June 2015²¹.
- 2.8. Nor are there data available on the impact of Brexit on the numbers of European Students studying in the Greater Manchester area, though a recent BBC article²² suggested that applications for some key courses were down. However, the impact will not be great as Greater Manchester Universities only have around 4,300 EU students (2014/15 HESA) representing 5% of all students.
- 2.9. Some figures are rounded and may not sum or divide exactly.

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3. *Recommendations & Executive Summary (Ch refers the Chapter within the report)*

- 3.1. Ch10.3: Recommendation: The starting point for the GMSF OAHN (Policy off) should be the ONS/DCLG 2014 based projections as it is the only scenario that can claim to be fully objective. This gives an OAHN (Policy off) of 9,423 per annum or 188,462 over the 20-year plan period.
- 3.2. Ch11.9: Recommendation: The Housing Target (Policy on) should be 9,894 dwellings per annum, 197,885 over the 20-year plan period. This includes a 5% buffer and is in line with past delivery and within the ten Local Authorities' current five year land supplies.

²¹

<https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/internationalmigration/bulletins/migrationstatisticsquarterlyreport/dec2016>

²² <http://www.bbc.co.uk/news/education-37786916>

- 3.3. Ch12.4: Recommendation: Oxford Economics should review the proposed level of GVA under the Accelerated Growth Scenario (AGS-2015) which now looks over-ambitious in light of the latest OBR projections from the Autumn (2016) Statement.
- 3.4. Ch13.3-13.6: Recommendation: That the Oxford Economics jobs growth numbers are tested in POPGROUP or other projection software to assess plausibility and consistency across population and dwelling changes. Four scenarios are suggested to test the robustness of the figures.
- 3.5. Ch7.4: Recommendation: International migration should be reviewed every two years - as ONS do for their national and sub-national population projections.
- 3.6. Ch4: The Draft Greater Manchester Spatial Framework (GMSF) has been updated to include the latest set of population and household projections (both 2014 based). This is in line with best practice.
- 3.7. Ch4.8: The impact of the trends feeding the latest sets of sub-national projections have not changed significantly and both the 2014 SNPPs and SNHPs provide a sound basis as the starting point for Objectively Assessed Housing Need (OAHN).
- 3.8. Ch4.10: The assumptions around vacancy rates are sound and reflect current thinking. Greater Manchester's vacancy rate is assumed to fall from 2.9% to 2.6% by 2035.
- 3.9. Ch4.14: There is evidence that the 2014 SNHPs are slightly over-projecting the numbers of households; figures for 2015 show DCLG household projections are 1% higher than equivalent DCLG estimates.
- 3.10. CH4.16: There are no issues surrounding the use of the Fertility and Mortality rates from the SNPPs. The only issues are around migration and some Local Plan Expert Group (LPEG) recommendations.
- 3.11. Ch5.3: ONS Population Projections from 2014 are in line with most recent (2015) Mid Year Estimates with lower natural change partially off-setting higher net migration.
- 3.12. Ch6: Current methodology allows (and Government Policy encourages) all areas to grow (above-trend) simultaneously. This is mathematically impossible **unless** all extra migration is fed by higher international migration. Firstly, internal moves within the UK must sum to zero - one area's gain must be another's loss. Secondly, the international migrant pool is set in the national projections and is finite; again, an increase (above-trend) in one area must reduce the other, unless the pool can be topped up with more international migrants. At the moment, outside ONS SNPPs, there is no mechanism to ensure that movers within the UK cancel each other out.
- 3.13. Ch6.3: The increase in moves within the Greater Manchester area suggests that mobility has been improving and that the Greater Manchester area is still attractive in terms of housing, work and study. 50,000 of 116,000 moves annually are within the Greater Manchester area.
- 3.14. Ch6.9: There is a strong need for more sub-national variant projections from ONS (Wales and Scotland already do this) that will provide consistent and objective results for a variety of scenario testing, in particular longer migration trends. This would improve the recommendation from LPEG that is currently to use the larger of two sets of migration (5 years or 10 years) which leads to double counting (Ch10.4).

- 3.15. Ch7.9 to 7.14: Analysis of Administrative data for international migrants for 2015 suggests growth in numbers coming into Greater Manchester; however, statistics on those leaving each year are not available and so no net figure is available.
- 3.16. Ch7.6: The decision to leave the EU (June 2016) has introduced a level of uncertainty that has yet to be tested. December 2017 will see the release of ONS data on the year to Mid 2017 and will be the first release on international migration to include a full year's migration post-Brexit.
- 3.17. Ch7.14: The number of EU students is relatively low (<4,500 or 5%) and so Brexit is unlikely to have much impact on Higher Education in Greater Manchester.
- 3.18. Ch7.15: It is likely the growth in numbers of international migrants will be reflected in the next Mid Year Estimates (MYEs) from ONS. Indeed, the latest figures for UK international migration for the year to June 2016 (released 1st Dec 2016) showed continued strong net immigration to the UK.
- 3.19. Ch8.3: Unattributable Population Change should not be included in projections as a) ONS cannot quantify the amount of UPC and b) It is unlikely that the errors between the 2001 census and 2011 will be replicated in 2021 due to changes in ONS MYE and Census methodology.
- 3.20. Ch9.5: Whilst the most recent economic growth estimates are above expectations (ONS²³), the construction sector has slipped into recession with the index falling in last two consecutive quarters from 114.4 (Q1 2016) to 113.0 (Q3 - 2016).
- 3.21. Ch9.7: The initial house building phasing makes good sense and looks achievable but the increases planned post-2022 are assuming levels only seen once in the last fifteen years, and that was after a period of sustained and strong economic growth. Can the house builders demonstrate that they will have the capacity?
- 3.22. Ch10: Some LPEG recommendations have elicited alternative suggestions to help improve consistency and methodology, one reason for the large number of representations (50+) received in the Parliamentary call for evidence²⁴ (July, 2016). LPEG recommendations would have benefitted from wider demographic input, including from Local Government and ONS.
- 3.23. Ch10.4: The LPEG recommendation to use the higher of five or ten year migration leads to double counting of migrants. In Greater Manchester's case this option is not activated as the 10 year trend is lower. However, as a general observation, ONS should produce additional sets of population projections where the migration (of whatever trend length) is controlled and consistent across all Local Authorities. It could then be decided which set to use and for all Planning Authorities to use EITHER the 10 year OR the 5 year set as the OAHN (Policy off).
- 3.24. Ch10.5: The LPEG recommendation to increase Household Representative Rates for 25-44 year olds towards 2008 levels is arbitrary and subjective. The trends in the 2014 SNHPs use data going back to 1971 and the latest Labour Force Survey data to 2014 and these should be used, not least because they are long term, objective and

²³ <https://www.ons.gov.uk/economy/economicoutputandproductivity/output>

²⁴ <http://www.parliament.uk/business/committees/committees-a-z/commons-select/communities-and-local-government-committee/inquiries/parliament-2015/local-plans-expert-group-recommendations-16-17/publications/>

more up to date. This LPEG recommendation also needs reconsideration as it is not fit for purpose.

- 3.25. Ch10.6: The Draft GMSF, using the LPEG recommendations on migration and HRRs, results in an annual dwelling requirement of 11,500 but this should NOT be considered as the OAHN (Policy off).
- 3.26. Ch10.6: Without a higher proportion of affordable homes, it is likely that HRRs for younger adults will remain low and may even start affecting older age groups. Indeed, by 2035, almost the entire cohort aged 25-44 who undertook higher education in England will have experienced higher university fees for the duration of their course(s).
- 3.27. Ch10.7: A distinction should be made between scenario-testing to examine the ranges of the Housing Target and the OAHN (Policy off) which should be based on recognised projections that are consistent across the country. i.e. use the latest ONS/DCLG projections.
- 3.28. Ch11.7: A further LPEG recommendation that fails in practice is the uplift for affordability. In this case, the GMSF SHMA discounts the recommendation as it leads to implausibly high results
- 3.29. Ch12.5, 12.7 & 12.10: There is no information on how Oxford Economics establish their population projections. A consistent set of baseline population projections are essential in order to assess how the extra jobs impact on population and dwelling requirements. Further information should be sought to clarify their methodology.
- 3.30. Ch12.12: Point of clarification on the definition of unemployed. The SHMA (Section 4.128) refers to the unemployed along with the economically inactive - they should be included as part of the economically active.
- 3.31. 13.2: Point of clarification on the unemployment rate. Oxford Economics define unemployment as the numbers on the claimant count register (AGS-2015) and not the recognised definition that also includes those willing and available to work.

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4. Policy off Scenarios - 2012 and 2014 Based Projections

4.1. The original Policy off scenario was based on the 2012 ONS Sub-National Population Projections (SNPPs)²⁵ which in turn fed the DCLG 2012 Sub-National Household Projections (SNHPs)²⁶. The figures from these projections are shown in Table 1 and cover the plan period of 2015 to 2035.

Table 1 : 2012 Based Population Projections for Local Authorities in the Greater Manchester area.

Area Name	2015	2035	Change	% Change	% Share of GM 2015	% Share of GM 2035
Bolton	283,800	312,100	28,300	10%	10.3%	10.3%
Bury	188,900	205,800	16,900	9%	6.9%	6.8%
Manchester	522,100	586,100	64,000	12%	19.0%	19.3%
Oldham	228,500	244,200	15,700	7%	8.3%	8.1%
Rochdale	213,200	222,200	9,000	4%	7.8%	7.3%
Salford	244,700	286,000	41,300	17%	8.9%	9.4%
Stockport	287,400	311,600	24,200	8%	10.5%	10.3%
Tameside	224,000	247,200	23,200	10%	8.1%	8.2%
Trafford	232,900	261,100	28,200	12%	8.5%	8.6%
Wigan	323,600	353,900	30,300	9%	11.8%	11.7%
Greater Manchester	2,749,100	3,030,100	281,000	10%	100.0%	100.0%

Source: ONS 2012 based SNPPs © Crown Copyright. Note: Figures are rounded to nearest 100 and so may not sum exactly.

4.2. Greater Manchester's population, in the 2012 based SNPPs, was projected to grow from 2.75m to just over 3.03m, an increase of 10%. In terms of mix between the Local Authorities making up the Greater Manchester area, there were small gains for Manchester and Salford and small losses in Rochdale and Stockport. Annual population growth was 14,050 per annum.

4.3. DCLG sub-national Household projections from the 2012 based SNHPs are shown in Table 2 below.

Table 2 : 2012 Based Household Projections for Local Authorities in the GM area.

Area Name	2015	2035	Change	% Change	% Share of GM 2015	% Share of GM 2035
Bolton	119,900	137,900	18,000	15%	10.3%	10.2%
Bury	80,300	90,800	10,500	13%	6.9%	6.7%
Manchester	214,800	257,200	42,400	20%	18.4%	19.0%
Oldham	92,400	105,300	12,900	14%	7.9%	7.8%
Rochdale	89,200	97,700	8,500	10%	7.6%	7.2%
Salford	109,100	133,200	24,100	22%	9.3%	9.9%
Stockport	125,000	141,900	16,900	14%	10.7%	10.5%
Tameside	98,000	113,600	15,600	16%	8.4%	8.4%
Trafford	98,000	115,700	17,700	18%	8.4%	8.6%
Wigan	140,500	158,500	18,000	13%	12.0%	11.7%
Greater Manchester	1,167,200	1,351,700	184,500	16%	100.0%	100.0%

Source: DCLG 2012 based SNHPs © Crown Copyright. Note: Figures are rounded to nearest 100 and so may not sum exactly.

4.4. The number of households in the Greater Manchester area was projected to grow by 16% over the plan period, with Manchester, Salford and Trafford projected to have

²⁵

<http://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationprojections/bulletins/subnationalpopulationprojectionsforengland/2014-05-29/relateddata>

²⁶ <https://www.gov.uk/government/statistics/2012-based-household-projections-in-england-2012-to-2037>

above average growth and Bury, Rochdale and Wigan with slower household growth than the Greater Manchester average. Average annual household growth of 9,225.

- 4.5. However, as the 2014 SNPPs and SNHPs were available for this update of the Draft GMSF Plan, Objectively Assessed Housing Need (OAHN) figures are now based on the 2014 sets. Equivalent figures for 2014 are shown in the next two Tables (Table 3 and Table 4).

Table 3 : 2014 Based Population Projections for Local Authorities in the GM area.

Area Name	2015	2035	Change	% Change	% Share of GM 2015	% Share of GM 2035
Bolton	281,700	303,000	21,300	8%	10.2%	10.0%
Bury	188,400	205,400	17,000	9%	6.8%	6.8%
Manchester	528,400	610,700	82,300	16%	19.2%	20.1%
Oldham	229,700	247,100	17,400	8%	8.3%	8.1%
Rochdale	213,300	222,900	9,600	5%	7.8%	7.3%
Salford	245,100	289,000	43,900	18%	8.9%	9.5%
Stockport	287,900	315,900	28,000	10%	10.5%	10.4%
Tameside	221,400	236,500	15,100	7%	8.0%	7.8%
Trafford	234,300	268,700	34,400	15%	8.5%	8.8%
Wigan	322,000	343,300	21,300	7%	11.7%	11.3%
Greater Manchester	2,752,100	3,042,500	290,400	11%	100.0%	100.0%

Source: ONS 2014 based SNPPs © Crown Copyright. Note: Figures are rounded to nearest 100 and so may not sum exactly.

- 4.6. Greater Manchester's population, in the 2014 based SNPPs is projected to grow from 2.75m to just over 3.04m, an increase of 11%. This is slightly higher than the increase in the 2012 based projections. In terms of mix between the Local Authorities making up the Greater Manchester area, there are small gains for Manchester and Salford and small losses in Rochdale and Wigan, similar to the 2012 based projections. Annual population growth in the 2014 set is 14,540 per annum, 3% higher than in the 2012 based projections.

- 4.7. DCLG Household projections from the 2014 based SNHPs are shown in Table 4 below.

Table 4 : 2014 Based Household Projections for Local Authorities in the GM area.

Area Name	2015	2035	Change	% Change	% Share of GM 2015	% Share of GM 2035
Bolton	118,800	133,000	14,200	12%	10.2%	9.8%
Bury	79,900	90,200	10,300	13%	6.8%	6.7%
Manchester	216,700	265,400	48,700	22%	18.6%	19.6%
Oldham	92,500	105,200	12,700	14%	7.9%	7.8%
Rochdale	89,300	98,500	9,200	10%	7.7%	7.3%
Salford	109,500	135,000	25,500	23%	9.4%	10.0%
Stockport	125,000	142,400	17,400	14%	10.7%	10.5%
Tameside	96,900	108,500	11,600	12%	8.3%	8.0%
Trafford	98,400	118,500	20,100	20%	8.4%	8.8%
Wigan	140,100	156,600	16,500	12%	12.0%	11.6%
Greater Manchester	1,167,100	1,353,300	186,200	16%	100.0%	100.0%

Source: DCLG 2014 based SNHPs © Crown Copyright. Note: Figures are rounded to nearest 100 and so may not sum exactly.

- 4.8. The number of households in the Greater Manchester area is projected to grow by 16% over the plan period, the same as in the 2012 based set, with Manchester, Salford and Trafford projected to have above average growth and Bury, Rochdale and

Wigan with slower household growth than the Greater Manchester average. Average household growth of 9,310 per annum, is slightly higher (1%) than under the 2012 based SNHPs.

The impact of the trends feeding the latest sets of sub-national projections have not changed significantly and both the 2014 SNPPs and SNHPs provide a sound basis as the starting point for Objectively Assessed Housing Need (OAHN).

- 4.9. **Vacancy:** Numbers of households are converted to dwellings using the vacancy rates (Dwellings= Households/(1-Vacancy Rate) which are derived from the DCLG Tables 125 (Dwellings) and Tables 615 (Vacant)²⁷. Figures for 2012 show Greater Manchester had a vacancy rate of 3.5% in 2012 and 2.9% for 2014. These numbers can be seen in Figure 5.33 on page 112 of the Background SHMA document²⁸.
- 4.10. **Vacancy:** Second Homes and shared dwellings should also be taken into account. The SHMA (Figure 8.17 Page 189) considers second homes, which account for just under 1% of dwellings (9,850 / 1,180,600) but ignores the shared dwellings, which is reasonable as the figures for shared dwellings are very low (<0.1% Census Table KS401EW). In the projections, vacancy rates are assumed to fall from 2.9% to 2.6% by 2035.
The assumptions around vacancy rates are sound and reflect current thinking. GM's vacancy rate is assumed to fall from 2.9% to 2.6% by 2035.
- 4.11. DCLG rebased the numbers of dwellings in 2011 to reflect the results of the 2011 Census. Vacancy rates, under Census definitions (which considers only UK Residents as occupants, i.e. household spaces with only non-UK residents would be recorded as vacant) gave a figure for the Greater Manchester area of 3.8% (Key Statistics Table KS401EW). There are no figures available for the numbers of households occupied solely by non-UK residents, but it is likely to be higher in areas with larger numbers of short-term international migrants, such as the Manchester City Council area ([See Section 7.13](#)). The equivalent figure in 2011 from the DCLG Table 615 and Table 125 was 4.0% which is slightly higher than the Census figure of 3.8%. DCLG estimates of Vacancy were slightly higher than Census suggests - this may still be the case.
- 4.12. Another recording problem occurred in April 2013 when there were changes to Council Tax discounts - see footnote in Table 615²⁹ "Where local authorities award zero discounts for empty properties there is less incentive for owners to report their property as empty. This could have led to some under reporting of some empty properties." There is no way to measure this possible under estimate of vacancy. Flexibility on Local Authority discounts can lead to under-reporting of true vacancy. Vacancy rates may actually be higher.
- 4.13. Using DCLG vacancy figures and applying them to the numbers of households from the DCLG SNHPs for 2015 will provide a comparison with the number of dwellings from DCLG Estimates for 2015. See Table 5 below.

²⁷ <https://www.gov.uk/government/statistical-data-sets/live-tables-on-dwelling-stock-including-vacants>

²⁸ http://gmsf-consult.objective.co.uk/portal/2016consultation/supp_docs?pointId=1477921277859

²⁹ <https://www.gov.uk/government/statistical-data-sets/live-tables-on-dwelling-stock-including-vacants>

Table 5 : Comparison of Dwelling Numbers using DCLG Vacancy Rates and SNHPs for 2015.

	A	B	$C = A \times (1 - B)$	D	C/D
Area Name	2014 SNHP Households	DCLG Vacancy Rate	Projected Dwellings	Table 125 Dwellings	% Difference
	2015	2015	2015	2015	2015
Bolton	116,800	3.6%	123,430	122,470	0.8%
Bury	79,940	3.1%	82,480	82,730	-0.3%
Manchester	216,700	1.6%	220,680	218,130	1.2%
Oldham	92,490	3.3%	95,640	94,080	1.7%
Rochdale	89,330	3.3%	92,390	91,450	1.0%
Salford	109,480	3.1%	112,940	111,120	1.6%
Stockport	125,020	2.5%	128,210	127,190	0.8%
Tameside	96,860	2.5%	99,370	100,900	-1.5%
Trafford	98,450	2.2%	100,690	97,960	2.6%
Wigan	140,070	2.9%	144,220	143,220	0.7%
Greater Manchester	1,167,140	2.7%	1,200,070	1,189,240	0.9%

Source: DCLG 2014 based SNHPs, DCLG Tables 615 and 125.

Note: Figures are rounded to nearest 10 and so may not sum exactly.

- 4.14. Table 5 shows that the projected number of households from the SNHPs (Col A), when used in conjunction with the DCLG estimates for vacancy rates (Col B), gives a higher projected number of dwellings (Col C) (1%) than the DCLG estimate (Col D).
DCLG household projections give dwelling numbers above (+0.9%) the DCLG estimates for 2015 suggesting that the 2014 SNHPs are slightly over-projecting the numbers of households.
- 4.15. The assumptions on vacancy used in the projections are in line with Local Plan Expert Group recommendations that where vacancy rates were above national levels, they would tend towards the national average. However, there are no national vacancy rate projections published and the assumptions on vacancy remain very much a policy decision.
- 4.16. Projections for births and deaths at Local Authority level follow the long term trends from the National Population Projections, but are adjusted to reflect the differentials in age and sex fertility and mortality rates within each Local Authority. This is replicated in the POPGROUP models and birth and death rates react to changes in the overall population age and sex structure that result from whatever migration assumptions are used.
There are no issues surrounding the use of the Fertility and Mortality rates from the SNPPs.

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5. Latest Population Estimates

- 5.1. Planning Policy Guidance (PPG) states that the latest DCLG household projections should provide the “starting point estimate of overall housing need” (PPG paragraph 2a-015). It also suggests that local circumstances, alternative assumptions and the most recent demographic evidence, including ONS population estimates, should also be considered (PPG paragraph 2a-017).
- 5.2. Accordingly, Table 6 below, shows the 2015 MYEs, released by ONS on 30th June 2016 and compares them with the ONS SNPPs from 2014 for the same year.

Table 6 : 2015 Mid Year Estimates compared with SNPPs 2014 Based for Mid 2015.

Area Name	2014 SNPPs for 2015	2015 MYEs	Difference	% Difference
Bolton	281,700	281,600	-100	0.0%
Bury	188,400	187,900	-500	-0.3%
Manchester	528,400	530,300	1,900	0.4%
Oldham	229,700	230,800	1,100	0.5%
Rochdale	213,300	214,200	900	0.4%
Salford	245,100	245,600	500	0.2%
Stockport	287,900	288,700	800	0.3%
Tameside	221,400	221,700	300	0.1%
Trafford	234,300	233,300	-1,000	-0.4%
Wigan	322,000	322,000	0	0.0%
Greater Manchester	2,752,100	2,756,200	4,100	0.1%

Source: ONS 2014 based SNPPs for 2015 vs. ONS 2015 MYEs © Crown Copyright.

Note: Figures are rounded to nearest 100 and so may not sum exactly.

5.3. From Table 6 it can be seen that for all Local Authorities within GM, projections from the 2014 SNPPs are within +/- 0.5% of the ONS Mid Year Estimate, with the overall Greater Manchester figure just 0.1% different. This is in line with ONS guidance that estimates and projections for larger geographical areas are more accurate (See ³⁰ Page 4).

Consequently, as the differences are very small at the Greater Manchester level, it is reasonable to conclude that the projections from 2014 are in line with most recent (2015) Mid Year Estimates; trends are continuing in the same direction and at the same level.

5.4. The difference in the two figures was mainly down to less net outward migration to elsewhere in the UK. The projected natural change and international migration components were close the MYE figures.

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6. Internal Migration - Moves within the UK

6.1. Also in line with PPG paragraph 2a-017 is an analysis of migration within the UK (internal migration) and international migration (Section 7). This is intended to demonstrate any changes in trends. ONS publish detailed estimates for internal moves (annually from 2011) and data are available by Single Year of Age and Sex for all Local Authorities in the UK.

6.2. Moves within the UK are made up of two elements - moves within the Greater Manchester area and moves between the Greater Manchester area and elsewhere in the UK. Figures for moves between Local Authorities within the Greater Manchester area (2011 to 2015) are shown in [Appendix Tables A101](#) to A105 and reveal an increase in moves from 45,300 in the year to Mid 2011 to 50,700 in the year to Mid 2015. This represents over 40% of all moves, both in and out.

6.3. The main moves **within** the Greater Manchester area are away from Manchester City Council (MCC), and to a lesser extent Salford, and into all the other Greater Manchester Local Authorities, though more strongly to Stockport and Trafford. Note that moves **within** the Greater Manchester area make no impact on the overall

³⁰

<https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationprojections/compendium/subnationalpopulationprojections/2014basedprojections/comparingsubnationalpopulationprojectionstomidyearestimatesfor2015/pdf>

Greater Manchester total in terms of population change. Moves within Greater Manchester sum to zero and they merely redistribute the existing population. **Increase in moves within the Greater Manchester area suggests that mobility is improving and that the Greater Manchester area is still attractive in terms of opportunities for housing, work and study.**

6.4. Table 7 below shows all the migration moves within and outside the GM area.

Table 7 : Moves between the GM and the rest of the UK.

		UK Outside GM	UK Outside GM	GM Area
To Mid	Within GM	INTO GM	OUT of GM	NET
2011	45,296	62,767	66,954	-4,187
2012	48,582	63,915	69,600	-5,685
2013	49,147	62,013	67,919	-5,905
2104	51,045	65,098	69,844	-4,746
2015	50,741	66,781	68,299	-1,519

Source: ONS Detailed Migration Estimates, Mid 2011 to Mid 2015 © Crown Copyright.

- 6.5. Moves between the Greater Manchester area and the rest of the UK have also increased from 62,770 inflow and 66,950 outflow in 2011 to 66,780 inflow and 68,300 outflow in 2015. Net (outward) flows have therefore slowed from -4,190 to -1,520. There has been a faster increase in moves INTO the Greater Manchester area than moves OUT.
- 6.6. Most of the origins and destinations with Local Authority flows above 1,000 in each direction are located in the NW (Liverpool, Cheshire, Lancashire), West Yorkshire (Leeds, Bradford & Sheffield), Birmingham and Derbyshire. London as a whole contributes around 8,000 migrants into and out of Greater Manchester (2015 data) while Wales contributes 3,000 and Scotland 2,000.
- 6.7. At the UK level, changes occur through ageing, natural change (births minus deaths) and international migration (net flows). Internal moves within the UK are a zero sum result - one Local Authority's gain is another Local Authority's loss.
- 6.8. The National (UK) Population Projections (NPPs) are produced by ONS in collaboration with the devolved Statistical Agencies of National Records Scotland (NRS), StatsWales and the Northern Ireland Statistical Research Agency (NISRA). Projections for each constituent country (available here ³¹), along with a set of variant projections (high and low fertility, high and low life expectancy, high and low migration, zero net migration) are also produced and are used by several government departments such as Education (School Roll Planning), Home Office (immigration Policy), HMRC (Tax revenues), DWP (Pensions forecasts), DCLG for Household Projections - each has its own requirements and each looks at differing time scales.
- 6.9. Currently, in England, ONS take the Principal Population Projection and use it to publish sub-national population projections with the sum of all the components of change at the Local Authority level controlled to the national figure. No variant

³¹

<http://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationprojections/bulletins/nationalpopulationprojections/2015-10-29/relateddata>

projections for migration are yet produced but ONS are considering this³². **To do so would help resolve the issue of doubling counting of migrants across the UK. At the moment, outside ONS projections, there is no mechanism to ensure that movers within the UK cancel each other out.**

- 6.10. To add such a constraint outside the national context would be very difficult; all Plans (Strategic & Local) would have to be agreed simultaneously. Having a nationally produced set to balance internal migration would resolve this issue; Local Authorities could still grow their population above the "official" trend base, but only through policies that grow international migration or by agreeing trade-offs of migrants, perhaps within a regional context.
- 6.11. The POPGROUP software is principally designed to allow population, household and labour force projections which can a) replicate ONS SNPPs and DCLG SNHPs and b) allow scenarios to run which can constrain or alter fertility, mortality, migration, numbers of dwelling, numbers of jobs to test out alternative policy options at a Local Authority level, as has been done by the Association of Greater Manchester Authorities (AGMA). However, the "Group" sheet is merely the sum of the individual Local Authorities and so includes all moves **WITHIN** the Greater Manchester area.
- 6.12. ONS publish the correct internal migration figures for Combined Authority and County Councils (or any grouping of Local Authorities) and exclude the internal moves **within** each sub-region. See ONS Table 5³³. POPGROUP **includes** moves within the Group Area, which in Greater Manchester case account for 50,700 out of 119,000 moves (2015 data).
- 6.13. As it stands, the POPGROUP software models each Local Authority independently when run in a Group (e.g. Greater Manchester) and each Local Authority, can, in turn, take migrants from the same pool (rest of the UK - including other Greater Manchester authorities and International) - and at the same time. This means that several Local Authorities within the same Group (GM) are growing by using the same migrants, who in turn, may already be helping another area to grow at the same time. There is no attempt to remove extra migrants gained in one area from the areas they have come from with the effect that:-
 - 1). UK internal migration will not sum to zero, as it should and
 - 2). International migration numbers will be higher than in the UK projections.
- 6.14. Consider the UK as a whole; the POPGROUP software would allow you to increase flows of internal in-migration for all Local Authorities at the same time - there is no constraint on the overall total, which in reality, should sum to zero in net terms. This is why it is important that ONS and the other devolved statistical agencies publish variant projections that are controlled correctly and provide a balanced set of internal (and international) migration.
- 6.15. As the process currently stands, the duty to cooperate with neighbouring Local Authorities would have to be extended so that there is agreement that not all Local Authorities can gain at the same time. Simultaneous above-trend growth can only really occur if net international migration is increased, and that is certainly NOT a Government Policy at the moment. On Planning, the Government Policy is aimed at

³²

<https://www.ons.gov.uk/peoplepopulationandcommunity/populationandmigration/populationprojections/articles/subnationalpopulationprojectionsresearchreportonvariantprojections/2014basedprojections>

³³

<https://www.ons.gov.uk/file?uri=/peoplepopulationandcommunity/populationandmigration/populationprojections/datasets/components-of-change-births-deaths-and-migration-for-regions-and-local-authorities-in-england-table5/2014based/table5.xls>

driving growth through Strategic Plans while Local Plans are being challenged for not being ambitious enough - but the sum of the parts is greater than what is mathematically possible. This issue needs to be seriously considered.

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7. International Migration - Moves to and from Outside the UK

- 7.1. ONS measure the movements of international migrants using the International Passenger Survey (IPS) which is principally used for Balance of Payments calculations. It has long been recognised as the weakest part of the population estimation process, particularly at Local Authority level as the sample size of long-term migrants (those coming to stay (or leaving the UK) for a period of more than one year, and therefore classed as a resident, is very small - approximately 3,000 for in-migrants and 2,000 for out-migrants³⁴ for the whole of the UK.
- 7.2. These numbers are scaled up to the totals that make up the flows that appear in the Long Term International Migrations (LTIM) Statistics that are released on a rolling quarterly basis. Figures for the year to Mid 2015 for the UK were estimated to be 639,000 in-migrants and 303,000 out-migrants. (See Table 11 in 7.15 for the UK figures).
- 7.3. International flows for the Greater Manchester area are shown in Tables 8 to 10 below.

Table 8 - Inward migration from outside the UK into GM - 2004/05 to 2014/15

Area Name	Annual INWARD International Migration										
	To Mid 2005	To Mid 2006	To Mid 2007	To Mid 2008	To Mid 2009	To Mid 2010	To Mid 2011	To Mid 2012	To Mid 2013	To Mid 2014	To Mid 2015
Bolton	900	1,946	1,741	1,933	1,754	1,424	1,857	1,453	1,617	1,703	1,957
Bury	700	1,378	1,175	1,160	1,100	1,057	921	718	670	818	855
Manchester	16,599	12,658	12,873	11,225	11,021	11,566	14,088	12,167	11,127	12,998	13,946
Oldham	806	1,393	1,225	1,243	1,263	1,030	1,290	1,067	1,115	1,174	1,335
Rochdale	907	1,303	1,073	1,143	1,021	761	1,030	748	898	1,000	1,292
Salford	3,078	3,146	3,328	3,492	2,963	2,686	3,105	2,625	2,590	3,121	3,289
Stockport	970	1,008	1,049	936	920	750	902	701	763	748	866
Tameside	614	878	959	793	707	597	707	576	560	588	721
Trafford	1,377	1,420	1,445	1,238	1,150	854	1,040	877	865	1,061	1,155
Wigan	521	1,162	1,101	1,168	1,062	747	959	737	829	850	1,012
Greater Manchester	26,472	26,292	25,969	24,331	22,961	21,472	25,899	21,669	21,034	24,061	26,428

Source: ONS 2015 MYE Components of Change © Crown Copyright.

- 7.4. Table 8 above - international migration inflows were as high in 2014/15 as in the years just after the EU Accession countries (A8) gained freedom of movement in 2004. Whether this level will be sustained in light of the Brexit vote is uncertain. That said, the SNPPs for Greater Manchester shows a fall in international migration down to the 21,000 per annum level from 2021 and the SHMA (8.20 - 8.22) acknowledges that this may already cater for some of the uncertainty. That may well be the case but clearly this an area that will need close monitoring over the next few years.
Recommendation: Review international migration every two years - as ONS do for their NPPs and SNPPs.

³⁴ <https://www.statisticsauthority.gov.uk/archive/assessment/monitoring/monitoring-reviews/monitoring-review-4-2013---the-robustness-of-the-international-passenger-survey.pdf>

Table 9 -Outward migration from GM to outside the UK - 2004/05 to 2014/15

	Annual OUTWARD International Migration										
Area Name	To Mid 2005	To Mid 2006	To Mid 2007	To Mid 2008	To Mid 2009	To Mid 2010	To Mid 2011	To Mid 2012	To Mid 2013	To Mid 2014	To Mid 2015
Bolton	677	895	1,058	1,050	904	655	884	987	1,203	1,267	986
Bury	977	783	747	658	816	750	672	488	574	519	655
Manchester	9,763	8,278	8,586	7,796	8,149	6,598	8,739	7,378	8,258	8,623	7,379
Oldham	858	718	673	448	596	561	634	368	421	369	320
Rochdale	1,160	912	745	592	706	764	744	573	745	601	689
Salford	1,608	1,430	1,542	1,405	1,436	1,195	1,346	1,467	1,497	1,643	1,289
Stockport	1,228	827	863	708	826	731	821	574	797	583	608
Tameside	833	584	667	443	565	459	557	463	557	455	420
Trafford	1,259	975	1,094	995	1,158	828	1,147	806	999	773	717
Wigan	732	787	869	735	517	335	472	440	593	574	491
Greater Manchester	19,095	16,189	16,844	14,830	15,673	12,876	16,016	13,544	15,644	15,407	13,554

Source: ONS 2015 MYE Components of Change © Crown Copyright.

- 7.5. Table 9 above - international migration outflows for 2014/15 were the second lowest in the last eleven years. Generally, numbers leaving the Greater Manchester area to outside the UK are lower than post Accession when flows in and out were higher. Again, the impact of the Brexit vote is yet to be seen in any available statistics and the SNPPs use approximately an average of the last five years, settling out at 14,400 into the longer term.

Table 10 - Net International migration - 2004/05 to 2014/15

	Annual Net International Migration										
Area Name	To Mid 2005	To Mid 2006	To Mid 2007	To Mid 2008	To Mid 2009	To Mid 2010	To Mid 2011	To Mid 2012	To Mid 2013	To Mid 2014	To Mid 2015
Bolton	223	1,051	683	883	850	769	973	466	414	436	971
Bury	-277	595	428	502	284	307	249	230	96	299	200
Manchester	6,836	4,380	4,287	3,429	2,872	4,968	5,349	4,789	2,869	4,375	6,567
Oldham	-52	675	552	795	667	469	656	699	694	805	1,015
Rochdale	-253	391	328	551	315	-3	286	175	153	399	603
Salford	1,470	1,716	1,786	2,087	1,527	1,491	1,759	1,158	1,093	1,478	2,000
Stockport	-258	181	186	228	94	19	81	127	-34	165	258
Tameside	-219	294	292	350	142	138	150	113	3	133	301
Trafford	118	445	351	243	-8	26	-107	71	-134	288	438
Wigan	-211	375	232	433	545	412	487	297	236	276	521
Greater Manchester	7,377	10,103	9,125	9,501	7,288	8,596	9,883	8,125	5,390	8,654	12,874

Source: ONS 2015 MYE Components of Change © Crown Copyright.

- 7.6. Table 10 above - international migration net flows have fluctuated between 5,400 and 10,100 in the period up to Mid 2014. The SNPPs use a net flow of 7,000 for the period beyond 2021 while for 2014/15, the 2014 based SNPPs projected a 12,700 net flow, very close to the actual figure (12,900). ONS SNPPs are on track on international migration and the medium term allows for a reduction in net international migration across the UK. Unfortunately, the 2016 SNPPs, due to be published in May 2018, and the 2016 SNHPs which will follow, will not have any post-Brexit migration included in it. **The first indication of post-Brexit international migration will be from the 2017 MYEs which would be published in June 2018 and it will not be until May 2020, when the 2018 SNPPs are published, that a better indication of the short term impact of Brexit on International migration will be available.**

- 7.7. ONS revised its methodology to improve the allocation of international migrants across Local Authorities and now uses statistics from a range of administrative sources including National Insurance Allocations, GP registrations, student data from the Higher Education Statistical Agency (HESA)³⁵.

- 7.8. Some of these data are available on the ONS Local Authority Migration Indicator (LAMI) Tool³⁶ and recent trends are shown in Appendix Tables A201 to A206. From those tables, the following observations are made:

³⁵ <http://www.ons.gov.uk/ons/guide-method/method-quality/imps/improvements-to-local-authority-immigration-estimates/overview-of-improved-methodology.pdf>

³⁶ <https://www.ons.gov.uk/file?uri=/peoplepopulationandcommunity/populationandmigration/migrationwithintheuk/datasets/localareamigrationindicatorsunitedkingdom/current/v1.0localareamigrationindicatorsaug16.xls>

- 7.9. **NINO:** [Appendix Table A201](#). Numbers of NINO Registrations peaked in 2007, the year before the banking crisis. Most recent figures for 2014 and 2015 are back to those levels suggesting continuing good job opportunities in the Greater Manchester area. If the decision had been to stay within the EU, then this data would support upward pressure on international inward migration in projections. However, information on net change is not available as there is no requirement to de-register when leaving the country.
There are now more uncertainties in the labour market for EU workers. Note that Manchester City Council takes almost half the Greater Manchester NINO registrations and that may be linked to non-UK students working as they study, in which case, non-UK student numbers should be closely monitored.
- 7.10. **GP Registrations:** [Appendix Table A202](#). Numbers of non-UK nationals who register with a GP have been averaging around 28,000 per annum. Most recent figures for 2014 and 2015 have gone above 30,000. This is higher than the Inflows from the MYEs, but those apply only to Residents i.e. those staying in the UK for over a year. Manchester City Council accounts for over half all registrations in the Greater Manchester area. As with NINO registrations, net change is not available as there is no requirement to de-register when leaving the country.
GP Registrations are less volatile than NINO Registrations but cover all ages and will include some non-residents.
- 7.11. **Births to Overseas Mothers:** [Appendix Table A203](#). Mothers born overseas have a higher number of children than their UK born counterparts. The estimated total fertility rate (TFR) for UK born women remained unchanged, with 1.76 children per woman in 2015; for non-UK born women the estimated TFR decreased to 2.08 compared with 2.10 in 2014³⁷. However, births have little impact on the numbers of dwellings needed over the next 20 years but may affect the type of houses needed in terms of size.
If the proportion of births to non-UK mothers continues to rise, there are likely to be more births, in the short to medium term - trends currently suggest that TFRs for non-UK born mothers are slowly converging. In 2012, the figure was 2.3 vs. 1.9 and in 2004, 2.5 vs. 1.7.
- 7.12. **Estimates of % Non-UK Born Population.** [Appendix Table A204](#). These numbers are estimated using the Annual Population Survey (APS) and were re-aligned with the 2011 Census data. England as a whole has increased from 6% non-UK population in 2005 to 9.3% in 2015 while the Greater Manchester area has increased faster since 2005, more than doubling from 4.3% in 2005 to 8.7% in 2015. There is no information on how HRRs vary between the two groups and so no inferences can be made on the impact of further increases on future HRRs.
- 7.13. **Short Term Migrants.** [Appendix Table A205](#). These numbers come from the International Passenger Survey (IPS) and cover those staying in the UK for between 3 and 12 months. Numbers are relatively small, at around 0.2% of the resident population, slightly below the national average for England (0.3%). There are no data for 2015 and publication of this data set started in 2008. Manchester City Council accounts for two thirds of the short term migrants coming into the Greater Manchester area where they represent 0.8% of the resident population. ([Back to 4.11](#)).
These migrants are not accounted for either in the MYEs or the SNPPs as they are not

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<http://www.ons.gov.uk/peoplepopulationandcommunity/birthsdeathsandmarriages/livebirths/bulletins/parentscountryofbirthenglandandwales/2015>

classed as residents. However, they do need accommodation and will add to the demand for housing, though these numbers do include students and so may be absorbed into communal student accommodation.

7.14. **Overseas Students.** [Appendix Table A206](#). These data come directly from HESA Tables available here³⁸ and are not included in the ONS LAMI Spreadsheet. There are four Universities in the Greater Manchester area, Bolton, Manchester Metropolitan, Manchester and Salford. Aggregated figures show falls, each year, in total numbers of all students since 2010/11 with a larger fall in 2012/13 when £9,000 tuition fees were introduced. Numbers of EU Students have also fallen each year and currently make up around 5% of all Students. Numbers of non-EU students have grown since 2012/13 and now account for 14% of all Students. **The number of EU students is relatively low and so Brexit is unlikely to have much impact on Higher Education in Greater Manchester.**

7.15. Table 11 shows the flows of International Migrants allocated to the Greater Manchester area and looks at GM's the share of the UK as a whole. Figures are shown for the year to end of June for the last 10 years. (2016 figures also included for UK).

Table 11 - International Migration Flows for the UK and GM.

UK & GM	000's	000's	000's	000's	000's	000's	% GM Share of UK		
Year Ending	Into UK	Out of UK	Net Flow	Into GM	Out of GM	Net Flow GM	Into UK	Out of UK	Net Flow
Jun-06	565.0	-388.0	177	26.3	-16.2	10.1	4.7%	4.2%	5.7%
Jun-07	595.0	-387.0	208	26.0	-16.8	9.1	4.4%	4.4%	4.4%
Jun-08	571.0	-375.0	196	24.3	-14.8	9.5	4.3%	4.0%	4.8%
Jun-09	563.0	-397.0	166	23.0	-15.7	7.3	4.1%	3.9%	4.4%
Jun-10	582.0	-347.0	235	21.5	-12.9	8.6	3.7%	3.7%	3.7%
Jun-11	589.0	-342.0	247	25.9	-16.0	9.9	4.4%	4.7%	4.0%
Jun-12	517.0	-349.0	168	21.7	-13.5	8.1	4.2%	3.9%	4.8%
Jun-13	502.0	-320.0	182	21.0	-15.6	5.4	4.2%	4.9%	3.0%
Jun-14	574.0	-320.0	254	24.1	-15.4	8.7	4.2%	4.8%	3.4%
Jun-15	639.0	-303.0	336	26.4	-13.6	12.9	4.1%	4.5%	3.8%
Jun-16	650.0	-315.0	335	NYA	NYA	NYA	NYA	NYA	NYA

Source: ONS LTIM, December, 2016 & ONS MYEs 2015 © Crown Copyright. NYA - Not yet available.

Note: Figures for the year to June 2016 are provisional.

7.16. From the Table above, net flows into the UK were the highest for over 10 years (and exceeded by the provisional estimate for the UK for Mid 2016), as were those to GM. There is still no data yet available to see if Brexit has had any impact. As a percentage of the UK total, the Greater Manchester share fluctuates over the years, between 3.0% and 5.7%, though more recently it has been between 3.0% and 4.8%.

7.17. For the Plan period (2015 to 2035), the projected international migration projections for the UK (NPPs 2014 based³⁹) and Greater Manchester (SNPPs 2014 based Table Z7⁴⁰) are shown in Table 12 below.

³⁸ <https://www.hesa.ac.uk/data-and-analysis/students/overviews>

³⁹ <http://www.ons.gov.uk/file?uri=/peoplepopulationandcommunity/populationandmigration/populationprojections/datasets/tablea11principalprojectionuksummary/2014based/rft-table-a1-1.xls>

⁴⁰ <http://www.ons.gov.uk/file?uri=/peoplepopulationandcommunity/populationandmigration/populationprojections/datasets/internationalmigrationz7/2014based/snppz7international.zip>

Table 12 - Projected Greater Manchester International Migration Flow as Share of the UK.

	NPPs	SNPPs	SNPPs / NPPs
Year to Mid	Net Flow UK	Net Flow GM	% GM of UK Net Flow
2015	329.0	12.7	3.9%
2016	256.0	9.9	3.9%
2017	232.0	8.9	3.9%
2018	226.0	8.7	3.8%
2019	206.5	7.9	3.8%
2020	195.5	7.4	3.8%
2021	185.0	7.0	3.8%
2022	185.0	7.0	3.8%
...
2035	185.0	7.0	3.8%

Source: ONS NPP Table A1-1, ONS SNPPs Table Z © Crown Copyright.

Note: Figures for 2021 to 2035 are all the same.

7.18. ONS fixes the numbers of international migrants from 2021 for the remainder of its projections period (in the case of the National Population Projections, this is up to 2114) for the UK and for each Local Authority (in the 2014 based SNPPs up to 2039). The proportion of the UK total for Local Authorities remains the same from 2021. This broad assumption highlights the uncertainty of international migration at a local level and so will need regular monitoring. UK Migration with the rest of the world is projected to decrease significantly by 2021.

7.19. In the same way that UK internal migration must sum to zero, the pool of international migrants is finite, unless the Government is prepared to accept higher net flows to satisfy growth. Projection scenarios that assume above-trend growth must take extra migrants **either** from elsewhere in the UK, in which case those migrants should be subtracted from the population from whence they came **or** taking someone else's share of the international migrant pool. One area's gain is another area's loss **unless** allowance is made for the net flow of international migrants to increase.

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8. Unattributable Population Change

8.1. There has been some debate on whether or not to include Unattributable Population Change (UPC) in population projections following the 2011 Census. UPC was the unexplained difference between the Rolled Forwards Mid Year Estimates (RFMYEs) to Mid 2011 and the 2011 Census based MYEs. Some Local Authorities had RFMYEs above the Census figure and some below but ONS were unable to determine to which component of change, or to which Census base, the surplus or deficit should be attributed.

8.2. ONS have published a tool which can be used to establish the most likely cause of the UPC⁴¹, but ONS are unable to determine the amount for each cause. The causes are a

⁴¹ <http://www.ons.gov.uk/ons/guide-method/method-quality/specific/population-and-migration/population-statistics-research-unit--psru-/latest-publications-from-the-population-statistics-research-unit/index.html>

combination of the following: a) 2001 Census error, b) 2011 Census error c) internal migration estimates error and d) international migration estimates error. Births and deaths are considered very high quality and so are excluded from the possible errors.

- 8.3. For the Greater Manchester area, UPC accounted for around 4,000 residents per annum (less than 0.2% of the MYEs) i.e. ONS were underestimating the resident population by that amount. There is likely to be a discrepancy when the 2021 Census based estimates are published but the errors will be for different reasons as a) ONS have changed their MYE methodology, and are going to do so again for the Mid 2017 MYEs and b) the 2021 Census will be conducted in a different way (mainly on-line) and so that will affect how errors or biases occur.
- UPC should not be included in projections as a) ONS cannot quantify the amount of UPC and b) It is unlikely that the errors between the 2001 census and 2011 will be replicated in 2021 due to changes in ONS MYE and Census methodology.**

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9. Housing Completions

- 9.1. Housing completions give a good indication of what the capacity for house building is within an area. Figures for the 10 Local Authorities in the Greater Manchester area are shown in Table 13. Note, these are used in preference to the figures in the SHMA (Figure 5.29 - Page 106) which are based on DCLG Live Tables; these are from Local Authority District Monitoring reports and should better reflect the actual changes.

Table 13 - Local Authority Completions 2004/5 to 2014/15.

Local Authority	2004/5	2005/6	2006/7	2007/8	2008/9	2009/10	2010/11	2011/12	2012/13	2013/14	2014/15
Bolton	395	786	1,013	1,336	663	463	433	588	469	407	469
Bury	724	910	346	384	273	198	253	220	274	266	543
Manchester	2,763	2,929	4,698	5,196	1,891	1,496	554	868	1,007	541	1,245
Oldham	135	132	315	399	401	-80	63	8	252	351	564
Rochdale	58	350	129	418	382	37	191	454	448	267	312
Salford	764	381	1,198	2,468	1,510	477	455	148	549	843	975
Stockport	405	489	741	632	395	207	187	201	298	374	464
Tameside	383	684	563	789	652	253	286	350	522	366	397
Trafford	746	698	537	366	344	283	256	200	32	145	215
Wigan	328	932	1,105	1,641	776	487	451	419	322	594	529
Greater Manchester	6,701	8,291	10,645	13,629	7,287	3,821	3,129	3,456	4,173	4,154	5,713

Source: Net Completions - Greater Manchester Districts' Monitoring Reports.

- 9.2. Average completions for the last 5 years are 4,125 for the last 10 years, 6,430. The 2014 based ONS/DCLG projections give an annual growth (2015-2035) in dwellings of 9,423 - 50% more growth than the average for the last 10 years. They are, however, in line with the five years in the build up to the peak year in 2007/8 when the average was 9,311 and therefore could be considered achievable, assuming the same levels of house building capacity and affordability.
- 9.3. However, recent building completion rates are well below the projected annual average of 9,423 dwellings (9,310 households) from the most recent 2014 SNHPs. Even at the 2014 SNHP build rate, there is an issue over a) house building industry capacity - which would appear to be well below previous levels^{42 43} and b) whatever capacity there may be for growth in the building sector, having simultaneous above-trend growth across the whole of the UK will require a further increase in capacity -

⁴² <http://www.ibtimes.co.uk/uk-housing-crisis-construction-skills-shortage-will-cause-crippling-delays-spiralling-costs-1537776>

⁴³ <https://www.theguardian.com/business/2015/oct/09/construction-skills-shortage-output-slump-august-building-sector>

are there the skills and manpower available for such increases? I am not aware of any Authority areas that are planning for growth below nationally based projections.

- 9.4. Recent Parliamentary DCLG Committees on "Capacity in the homebuilding industry inquiry" spoke with large developers⁴⁴ 31/10/2016) and small developers⁴⁵ (21/11/2016) on this issue and found concerns regarding skill shortages as Barrett Homes Chief Exec said..." A very significant part of our workforce, particularly in London and southern areas but also elsewhere in the UK, is not UK-based. The availability of skills is going to be our big concern."
- 9.5. Whilst the most recent economic growth estimates are above expectations (ONS⁴⁶), **the construction sector has slipped in technical recession(ONS⁴⁷) with the index falling in consecutive quarters from 114.4 (Q1 2016) to 113.0 (Q3 - 2016).**
- 9.6. The proposed phasing for house building (Draft GMSF - Page 53) does take account of recent trends in completions and starts-ups at 6,100 in 2015/16 building up to double that amount to 12,300 by 2022/23, and sustaining that level until the end of the Plan period.
- 9.7. **The initial phasing makes good sense and looks achievable but the sustained levels of increase post-2022 are assuming levels only seen once in the last fifteen years, and that was after a period of sustained and strong economic growth. Whether that sort of increase in capacity is achievable is something that the house builders will have to demonstrate.**
- 9.8. Table 14 compares the 2014 SNHPs, the Local Plans five year Housing Land Supply and the North West Regional Spatial Strategy (NWRSS) with the proposed OAHN (Policy off) from the GMSF.

Table 14 - Annual Net Dwelling Projections.

	Average (Net of clearance)	Five Year Land Supply	Converted to Dwellings	OAHN
Plan Period====>	2003-2021	Mostly 2011-2026	2015-2035	2015-2035
Area Name	NW RSS	Local Plans	2014 SNHP	Draft GMSF
Bolton	578	694	674	840
Bury	500	400	502	625
Manchester	3,500	3,333	2,531	2,765
Oldham	289	460	625	685
Rochdale	400	460	451	775
Salford	1,600	1,748	1,313	1,745
Stockport	450	480	892	965
Tameside	750	750	592	680
Trafford	578	678	1,025	1,155
Wigan	978	1,000	817	1,125
Greater Manchester	9,623	10,004	9,422	11,360

Sources: Local Plans, NWRSS, GMSF, DCLG 2014 SNHPs

([Go back to 11.7](#))

- 9.9. Overall, the NWRSS, the Local Plans and the 2014 SNHPs all give figures at or below 10,000 dwellings per annum. The most recent figures from the 2014 SNHPs are an ideal starting point for the OAHN (Policy off).

⁴⁴ <http://www.parliament.uk/business/committees/committees-a-z/commons-select/communities-and-local-government-committee/inquiries/parliament-2015/capacity-in-the-homebuilding-industry-16-17/publications/>

⁴⁵ <http://www.parliament.uk/business/committees/committees-a-z/commons-select/communities-and-local-government-committee/inquiries/parliament-2015/capacity-in-the-homebuilding-industry-16-17/publications/>

⁴⁶ <https://www.ons.gov.uk/economy/economicoutputandproductivity/output>

⁴⁷ <https://www.ons.gov.uk/economy/grossdomesticproductgdp/timeseries/l2n8/pn2>

10. Objectively Assessed Housing Need (Policy off) - Strategic Market Housing Assessment (SHMA) ⁴⁸ -

- 10.1. This section looks at how the SHMA builds up to the OAHN (Policy off) figure and considers the issues involved when applying some of the Local Plan Expert Group (LPEG) recommendations (Appendix 6 ⁴⁹).
- 10.2. The build-up of the figures to the OAHN are clearly set out in Chapter 8 of the SHMA Report and considers four stages:-
- Stage 1: Forecast population change (which set to use - see 10.3 & 10.4)
 - Stage 2: Translate population into households (which HRRs to use - see 10.5 & 10.6)
 - Stage 3: Translate households into dwellings (policy decisions for vacancy rates - see 4.9 to 4.13)
 - Stage 4: Apply market signals (discounted See SHMA 8.52 -- 8.55)

The following three scenarios, which consider parts of Stage 1 and 2 were undertaken by the Association for Greater Manchester Authorities (AGMA) using the POPGROUP software.

- 10.3. **Scenario A: SHMA 8.27:** This is the OAHN (Policy off) baseline projection that uses the ONS 2014 SNPPs and the DCLG 2014 SNHPs, as discussed in 4.7 - 4.8. These ought to be used as the OAHN as they are independent of arbitrary assumptions and are nationally consistent..."Therefore, they give an indication of what the future population, by age and sex structure, might be if recent trends continue, and take no account of policy or development aims in local authorities."..from the 2014 SNHP DCLG paper on Methodology ⁵⁰ i.e. they are wholly objective.

The dwelling requirement that is generated in this scenario is 9,423 per annum and should be considered to be the starting point for an OAHN (Policy off) for the GMSF as it is the only scenario that can claim to be fully objective.

- 10.4. **Scenario B: SHMA 8.23-8.25:** Uses the LPEG recommendation to use the higher of either a) 5 year migration average or b) 10 year migration average (LPEG Paragraph:017 Reference ID:2 aS017S20140306). It should be noted that the recommendation as it stands, if applied across the whole UK simultaneously, would lead to double counting of migrants (both internal and international). This view has been fed back to a Parliamentary call for evidence in response to the LPEG recommendations by at least three respondents (Opinions Research Services⁵¹, Peter Brett Associates⁵² and BSPS⁵³) whose comments are available to view.

In the case of Greater Manchester the 5 year average is higher than the 10 year and so this scenario has been discounted. The dwelling requirement that is generated in this scenario is 7,960 per annum.

In order to be consistent across the UK, firstly, ONS should publish population projections based on 10 year migration trends and secondly, the recommendation should be that all Planning Authorities use EITHER the 10 year OR the 5 year set as the OAHN (Policy off).

⁴⁸ http://gmsf-consult.objective.co.uk/portal/2016consultation/supp_docs?pointId=1477921277859

⁴⁹ <http://lpeg.org/wp-content/uploads/2016/02/Appendices-local-plans-report-to-government.pdf>

⁵⁰ https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/536705/Household_Projections_2014-based_Methodology_Report.pdf

⁵¹ <http://data.parliament.uk/writtenevidence/committeeevidence.svc/evidencedocument/communities-and-local-government-committee/local-plans-expert-group/written/34622.html>

⁵² <http://data.parliament.uk/writtenevidence/committeeevidence.svc/evidencedocument/communities-and-local-government-committee/local-plans-expert-group/written/34623.pdf>

⁵³ <http://data.parliament.uk/writtenevidence/committeeevidence.svc/evidencedocument/communities-and-local-government-committee/local-plans-expert-group/written/34498.pdf>

10.5. Scenario C: SHMA 8.35: Presumes that the Household Representative Rates (HRRs = Household Formation Rates) for the 25-44 year olds from the 2012 SNHPs are too low and the LPEG report recommends amending the 2012 HRRs for the 25-44 cohorts to half way between the 2008 and 2012 rates by 2033 and then trending the 2012 rates from 2033. This assumption has been applied to the 2014 SNHPs in the SHMA (8.32).

This scenario results in an extra 35,000 households (+18% - see SHMA Figure 8.16) giving an annual dwelling requirement of 11,500 (See SHMA 8.44). This should NOT be considered as the OAHN (Policy off) for the following reasons:-

i) The latest data should always be used - figures from 2008 are out of date, as are figures from 2012 - this is accepted best practice in demographic methodology.

ii) Long term trends - the Stage 1 HRRs (Relationship Status projections - see DCLG Methodology Report⁵⁴) used in the DCLG SNHPs are based on long term trends starting in 1971 and continuing to 2011 Census data, and then supplemented by the latest information from the Labour Force Survey (LFS). There is no objective basis for choosing to adjust any age group.

iii) Recent trends may continue and turn into a cohort effect which may reduce HRRs in future years at older ages. Those with student debt and priced out of the market are going to have to rent and share more or return to the family home which could lead to larger household sizes (Average Household Size - AHS in the UK didn't fall between the 2001 and 2011 Censuses) and would therefore lower HRRs at older ages. The article from Town & Country Planning (T&CP) by Professor Ludi Simpson⁵⁵ looks at this issue and there has been no evidence presented to suggest that HRRs will return to 2008 levels for those aged 25-44 - it ignores the trends in an arbitrary way. It is also an early warning that affordable housing is not being adequately addressed, indeed the latest figures announced by DCLG for 2015/16 show the lowest level built for 24 years⁵⁶.

10.6. The decision to apply the HRRs uplift is purely subjective; planners are making an assumption that cannot be tested and has no research behind it. Furthermore, LPEG did not seek advice from ONS nor had any Local Government demographic input on either of these recommendations. Responses to the LPEG recommendations have been made following the Parliamentary call for evidence on the LPEG recommendations, and are also commented on in two Town & Country Planning articles, one by Professor Simpson (already referred to above) in his paper on Household Projections and one by McDonald and Whitehead⁵⁷ on the HRR uplift suggested following the release of the 2012 based SNHPs.

This scenario results in an annual dwelling requirement of 227,200 which the SHMA presents as the OAHN (Policy off) - for the reasons given in 10.5 and here in 10.6, the OAHN (Policy off) should be 188,462.

Without a higher proportion of affordable homes, it is likely that HRRs for younger adults will remain low and may even start affecting older age groups. Indeed, by 2035, almost the entire cohort aged 25-44 who undertook higher education in England will have experienced higher university fees for the duration of their course(s).

⁵⁴ https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/536705/Household_Projections_2014-based_Methodology_Report.pdf

⁵⁵ <https://www.escholar.manchester.ac.uk/api/datastream?publicationPid=uk-ac-man-scw:243721&datastreamId=POST-PEER-REVIEW-PUBLISHERS.PDF>

⁵⁶ <http://www.bbc.co.uk/news/education-38015368>

⁵⁷ <http://archive.swale.gov.uk/assets/Planning-General/Planning-Policy/Evidence-Base/Local-Plan-2014/Further-evidence-2015/SBCPS091-Town-and-Country-Planning-Paper-17.pdf>

- 10.7. **The concept of using alternative rates and trends should be encouraged as it helps demonstrate the ranges of possibilities and the sensitivities of each component.** However, scenarios that move away from the nationally consistent sets should form part of the Housing Target process and not the OAHN (Policy off) and furthermore, to bear in mind that to assume above-trend growth across the UK relies on re-using migrants.

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11. Housing Target - (Policy on) - SHMA.

- 11.1. Chapter 10 of the SMHA outlines the calculation of the Housing Target. It starts with the amount of suitable and deliverable sites from the Strategic Housing Land Availability Assessment (SHLAA) which identifies 170,400 dwellings already available in the period 2015 to 2035.
- 11.2. An allowance is made for wind-fall sites which adds 11,000 to the total above which gives 181,400 vs. GMSF OAHN of 227,200 (a shortfall of 45,800 - SHMA calculates the shortfall at 45,500 but this may be due to rounding).
- 11.3. The option of using Districts outside Greater Manchester to accommodate the shortfall was discussed but no such assistance was forthcoming.
- 11.4. Next it looked at the option of sites on the edge of the urban area such as land currently safeguarded from development or within the adopted Green Belt; this process identified 64,000 "allocations".
- 11.5. Add on "allocations" to 181,400 which gets to 245,300, which now incorporates a buffer of 8% ($227,200 \times 1.08 = 245,300$) equivalent to 1.6 years worth of requirement - SHMA Table 10.5 on page 207)
- 11.6. The LPEG adjustment for affordable housing to reflect market signals is also considered. This takes the SHMA OAHN and adds 10%, 20% or 25% to the OAHN which results in a housing target of 265,800 (resident basis -SHMA Table on page 233), well above the figure that includes the "allocations". The LPEG methodology then requires a further 10% uplift to be applied if a district would be unable to deliver its identified affordable housing need based on that total number of dwellings and its likely tenure split. That takes the housing target to 292,400 - SHMA Table on page 234.
- 11.7. **The GMSF SHMA acknowledges that this LPEG recommendation is "inappropriate" (Page 234) and has been discounted** with the final housing target at 245,300 - SHMA Table 10.5.
- 11.8. National Policy Planning Framework⁵⁸ (NPPF) recommends "an additional buffer of 5% (moved forward from later in the plan period) to ensure choice and competition in the market for land." This has been included below.
- 11.9. If the OAHN excluded the LPEG recommendations (i.e. using the 2014 based projections without any alterations) and the figure of 188,462 is used, along with a 5% buffer⁵⁹ then the Housing Target would be $188,462 + 9,423 = 197,885$. This would considerably reduce the need to build on safeguarded and greenbelt land. This figure

⁵⁸ https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6077/2116950.pdf

⁵⁹ <http://planningguidance.communities.gov.uk/blog/policy/achieving-sustainable-development/delivering-sustainable-development/6-delivering-a-wide-choice-of-high-quality-homes/>

works out at close to 10,000 dwellings per annum which is what the Local Authorities have calculated as their annual rate from their five year land supply (see Table 13). **Housing Target should be 9,894 dwellings per annum, 197,885 over the 20-year plan period. This figure is in line with past delivery and the ten Local Authorities' current five year land supply.**

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12. Jobs Led Projections - (Policy on)

- 12.1. New Economy⁶⁰, which is the policy, research and strategy arm of the Greater Manchester Combined Authority (GM-CA) commissioned Oxford Economics to produce projections on growing the economy as detailed in "Implications for GMSF - Economic Evidence Report⁶¹". There are two scenarios; a baseline scenario "GMSF 2015" and an Accelerated Growth scenario "AGS-2015" with Gross Value Added (GVA) growing at 2.3% per annum).
- 12.2. GMSF 2015 "Under baseline conditions, employment in Greater Manchester is forecast to grow by 0.5% year-on-year adding an additional 146,600 jobs over the next two decades." This leads to an increase in the Greater Manchester population of 235,100 to 2,982,800 which is some 60,000 lower than the ONS 2014 SNPPs.
- 12.3. AGS-2015 "Under this scenario, GVA growth is estimated to be 2.5% year-on-year, giving an uplift of £5bn above baseline conditions by 2035. An additional 199,700 jobs are also anticipated to be created over the next two decades (53,100 above the baseline); population would grow by 294,800 (59,700 above the baseline)." This gives a Greater Manchester population of 3,042,500 in 2035, the same as the ONS 2014 based SNPPs (See Table 3).
- 12.4. The Government's Autumn Statement (23rd November, 2016⁶²) announced revised OBR growth forecasts with growth upgraded to 2.1% in 2016 - from 2.0% - then downgraded to 1.4% in 2017, from 2.2%. Forecast growth of 1.7% in 2018, 2.1% in 2019 and 2020 and 2% in 2021. **Certainly in the short term, the proposed level of GVA growth under AGS-2015 looks over-ambitious and should be reviewed.**
- 12.5. Oxford Economics have used their own set of population projections for the Baseline Scenario (GMSF-2015) and the Accelerated Growth Scenario (AGS-2015). Whilst the figures for 2035 under the AGS-2015 appear to match the ONS 2014 SNPPs, it is not clear how OE produce their population projections, nor whether anyone has tested the employment growth figures against the POPGROUP model to see the impact on dwellings.
The methodology for the OE population projections should to be assessed and tested against other recognised software to ensure consistency.
- 12.6. The implication of the AGS-2015 is that all the jobs growth can be absorbed by the population from the ONS 2014 based projections.
- 12.7. The implication of the Baseline scenario (GMSF-2015) from OE is that population growth will be below the ONS SNPPs by some 60,000 (See Table 15 below) which would be the equivalent of approximately 26,700 fewer Households (using 1.7% Communal Population - DCLG, 2.21 average household size DCLG SNPPs in 2035) or 27,400 fewer dwellings (using vacancy rate 2.63% for Greater Manchester by 2035).

⁶⁰ <http://neweconomymanchester.com/about-us/about-new-economy>

⁶¹ http://gmsf-consult.objective.co.uk/portal/2016consultation/supp_docs?pointId=1478080568258

⁶² <http://www.bbc.co.uk/news/uk-politics-38075649>

i.e. 1,400 fewer dwellings per annum than the SNHPs giving 8,000 per annum as an OAHN. There is no link between the Jobs growth scenarios and the OAHN (Policy off) or Housing Target (Policy on) - this needs to be tested.

12.8. Working back the other way, from the Baseline, it also implies that 3,000 per annum population (what is needed to get back to the ONS SNPPs) and 1,400 dwellings (as calculated above) will satisfy the extra jobs over and above the Baseline Scenario. AGS-2015 Table in Section 1.4 of the Background Paper on the AGS suggests 53,100 extra jobs based on the ONS 2014 SNPPs which is equivalent to 2,660 jobs per annum extra. This is a very high conversion of extra population to jobs - normally, one extra job would need two extra residents (and one extra dwelling) so it is important to fully understand how the two population projections are linked and whether they produce consistent dwelling numbers. See the suggestions in Chapter 13 below.

12.9. The only information available is from the Economic Forecasting Summary Report⁶³ which states "Oxford Economics (OE) GMSF baseline 2015 models population based on economic assumptions and this is below the 2014-based sub-national population projections (SNPPs) produced by the Office for National Statistics." As noted above, OE use their own (source and method unknown) population projections. From the spreadsheet supplied via New Economy (GMFM_MainOutput_CoreSheetsOnly.xlsx) a comparison for the Age groups given is shown for the Baseline scenario GMSF-2015.

Table 15 - Oxford Economics Population Projections vs. ONS 2014 Based SNPPs.

GM Population	OE 2015	ONS SNPP 2015	Difference	OE 2035	SNPP 2035	Difference	Employment @72.8%	Employment @74.3%
16-64	1,765,090	1,767,230	2,140	1,807,880	1,834,800	26,920	19,600	20,000
15-74	2,034,710	2,039,610	4,900	2,140,560	2,185,560	45,000	32,760	33,440
All Ages	2,747,680	2,752,120	4,440	2,982,790	3,042,550	59,760	N/A	N/A

Source: Oxford Economics (GMSF 2015) and ONS 2014 Based SNPPs: Note: All figures rounded to nearest 10

12.10. Whilst the figures for the starting point for the Plan Period are within 0.2% (OE lower than ONS), by 2035 the difference is 2% lower than the SNPPs. If the employment rates from the GMSF-2015 and the AGS-2015 were applied to the difference in the working age group (16-64), there would be an extra 19,600 or 20,000 jobs respectively and if the 15-75 age group were used the approximate figures for extra jobs would be 32,800 and 33,400. The uplift in jobs given by OE in the AGS-2015 is 53,100, well above the calculations in Table 15 above. Again, this sort of discrepancy needs to be checked and explained. A better understanding of the methodology would be beneficial.

A consistent set of baseline population projections are essential in order to assess the reasonableness/viability of extra jobs in terms of skills, commuting, unemployment and employment (and associated infrastructure) and how the extra jobs impact on population and dwelling requirements. See Chapter 13 for a suggested way forwards on this.

12.11. Note that the Economically Active include the Unemployed. The SHMA 4.128 (Page 54) refers to it as being within the Economically Inactive group - this is incorrect. See metadata from NOMIS⁶⁴.

12.12. Unemployment definition is also confused in 4.18 of the Economic Forecasting Summary⁶⁵ Report where unemployment is defined as the Claimant Count "Defined as the proportion of the 16-64 population on the claimant count register, the unemployment rate in Greater Manchester is forecast to fall from 2.7% in 2015 to

⁶³ http://gmsf-consult.objective.co.uk/portal/2016consultation/supp_docs?pointId=1477582968852

⁶⁴ <https://www.nomisweb.co.uk/reports/lmp/lep/1925185547/report.aspx?town=Greater#tabempunemp>

⁶⁵ http://gmsf-consult.objective.co.uk/portal/2016consultation/supp_docs?pointId=1477582968852

2.6% in 2035 under baseline conditions and under the AGS 2015 to 2.4%."...in fact it also includes those looking for and available to work, irrespective of whether they are claiming out of work benefits. This should be clarified and amended.

- 12.13. Commuting assumptions are not covered in the Economic Forecasting Summary Report and it is not clear how commuting is dealt with in the baseline scenario GMSF-2015. Under AGS-2015, some of the extra growth in jobs will be filled by extra commuters, with an extra 1000 people commuting into the Greater Manchester area by 2035.

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13. Suggestions for alternative scenarios and double checking

- 13.1. Suggestion 1: There needs to be some co-ordination of migration (both internal and international) at a Regional level. Local Authorities within regions can then more easily agree between themselves where extra growth will be and where it should come from. Moves within the UK must sum to zero and the pool of international migrants must also be monitored so the total numbers needed to satisfy above-trend growth is transparent. Growth that assumes higher international net migration will clearly cause concern amongst Government policy makers.
- 13.2. Suggestion 2: *SHMA 8.26*: Any jobs led scenarios from organisations providing jobs led projections (e.g. Oxford Economics, Cambridge Econometrics, Experian) should be checked within the POPGROUP model (or other software if in use) to compare results and examine the impact on Population and Households/Dwellings. This is in line with PPG paragraph 2a-018 which suggests that "Evidence that links demographic change to forecasts of economic growth should also be assessed".
- 13.3. Test Scenario 1. Use the Oxford Economics Baseline Population (GMSF-2015) and run it within POPGROUP, if available, to see what numbers of a) households and b) jobs are produced to compare with the ONS/DCLG 2014 based projections.
- 13.4. Test Scenario 2. Use the Oxford Economics Accelerated Growth Scenario Population (AGS-2015) and run it within POPGROUP, if available, to see what numbers of a) households and b) jobs are produced to compare with the ONS/DCLG 2014 based projections.
- 13.5. Test Scenario 3. Take the Oxford Economics change in numbers of jobs from GMSF-2015 and compare with the numbers of jobs generated from the ONS/DCLG 2014 based projections. Use the difference in numbers of jobs as a jobs-led scenario to compare the resulting a) population and b) numbers of households that are generated.
- 13.6. Test Scenario 4. Take the Oxford Economics change in numbers of jobs from AGS-2015 and compare with the numbers of jobs generated from the ONS/DCLG 2014 based projections. Use the difference in numbers of jobs as a jobs-led scenario to compare the resulting a) population and b) numbers of households that are generated.
- 13.7. In each case, the Economic Activity Rates should come from the Office for Budgetary Responsibility (OBR) projections as supplied by Edge Analytics (POPGROUP licence holders ⁶⁶). Assumptions on commuting rates and unemployment can also be set to match Oxford Economics', though note that the Unemployment rate should not be

⁶⁶ <http://www.edgeanalytics.co.uk/popgroup.php>

just be the claimant count rate but should include those available and willing to work.

- 13.8. The purpose of these Test Scenarios is to challenge the robustness of the two models (Oxford Economics and POPGROUP). The relationship between changes in population, households and jobs should be similar across the two models. POPGROUP has had significant investment in aligning the methodology with ONS and DCLG so that official projections can be replicated and any move away from the official trends are transparent both in terms of input and output. This provides the POPGROUP user with the ability and confidence to easily track changes. Less is known about the Oxford Economics model.

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Appendix - Tables

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Appendix Table A101 - Moves within GM Year to Mid 2015. ([Back to Report](#))

Sum of Moves_2015			InLA	INLA_Name	Into_GM									
			E08000001	E08000002	E08000003	E08000004	E08000005	E08000006	E08000007	E08000008	E08000009	E08000010		Grand Total
OutLA	OutLA_Name	Out_GM	Bolton	Bury	Manchester	Oldham	Rochdale	Salford	Stockport	Tameside	Trafford	Wigan		
			GM	GM	GM	GM	GM	GM	GM	GM	GM	GM		
E08000001	Bolton	GM			798	563	114	167	589	114	59	107	930	3441
E08000002	Bury	GM		911		832	154	598	602	168	90	207	135	3697
E08000003	Manchester	GM		604	1251		1418	1205	2673	3436	1834	3677	390	16488
E08000004	Oldham	GM		96	186	1003		850	202	197	738	103	57	3432
E08000005	Rochdale	GM		179	548	717	887		215	120	140	128	90	3024
E08000006	Salford	GM		893	779	2333	194	289		348	210	856	777	6680
E08000007	Stockport	GM		83	87	1623	125	92	250		921	431	95	3707
E08000008	Tameside	GM		89	111	990	767	159	210	817		144	59	3346
E08000009	Trafford	GM		168	198	2533	105	79	900	421	115		170	4691
E08000010	Wigan	GM		711	114	396	47	62	618	102	61	123		2235
Grand Total			3734	4072	10992	3810	3502	6261	5723	4167	5776	2704		50741

Appendix Table A102 - Moves within GM Year to Mid 2014

Sum of Moves_2014			InLA	INLA_Name	Into_GM									
			E08000001	E08000002	E08000003	E08000004	E08000005	E08000006	E08000007	E08000008	E08000009	E08000010		Grand Total
OutLA	OutLA_Name	Out_GM	Bolton	Bury	Manchester	Oldham	Rochdale	Salford	Stockport	Tameside	Trafford	Wigan		
			GM	GM	GM	GM	GM	GM	GM	GM	GM	GM		
E08000001	Bolton	GM			772	630	177	133	694	131	96	153	959	3,745
E08000002	Bury	GM		780		861	142	608	646	133	102	195	143	3,609
E08000003	Manchester	GM		556	1,294		1,288	1,095	2,772	3,462	1,643	3,618	415	16,142
E08000004	Oldham	GM		109	156	1,090		961	188	161	748	121	55	3,589
E08000005	Rochdale	GM		163	545	705	964		194	104	161	114	79	3,029
E08000006	Salford	GM		765	731	2,476	179	217		328	215	889	776	6,576
E08000007	Stockport	GM		103	118	1,873	130	68	278		1,001	402	94	4,066
E08000008	Tameside	GM		93	153	1,135	810	209	242	939		198	58	3,837
E08000009	Trafford	GM		127	146	2,198	76	79	768	486	169		133	4,182
E08000010	Wigan	GM		790	115	396	57	68	549	106	63	125		2,269
Grand Total			3,486	4,031	11,363	3,823	3,438	6,332	5,850	4,197	5,813	2,710		51,045

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Appendix Table A103 - Moves within GM Year to Mid 2013

Sum of Moves_2013			InLA E08000001 Bolton GM	INLA_Name E08000002 Bury GM	Into_GM E08000003 Manchester GM	E08000004 Oldham GM	E08000005 Rochdale GM	E08000006 Salford GM	E08000007 Stockport GM	E08000008 Tameside GM	E08000009 Trafford GM	E08000010 Wigan GM	Grand Total	
OutLA	OutLA_Name	Out_GM	GM	GM	GM	GM	GM	GM	GM	GM	GM	GM		
E08000001	Bolton	GM		670	526	95	92	700	93	64	151	846	3,237	
E08000002	Bury	GM		830	873	135	566	638	106	125	191	112	3,577	
E08000003	Manchester	GM		555	1,155	1,323	984	2,653	3,121	1,668	3,595	409	15,464	
E08000004	Oldham	GM		134	165	1,016	871	187	123	632	145	60	3,331	
E08000005	Rochdale	GM		165	546	811	767	235	97	171	131	77	3,001	
E08000006	Salford	GM		749	770	2,647	188	238	350	208	896	705	6,751	
E08000007	Stockport	GM		96	137	1,836	111	82	250	916	446	59	3,932	
E08000008	Tameside	GM		92	117	1,076	724	173	238	829	165	67	3,481	
E08000009	Trafford	GM		119	113	2,376	65	72	746	452	143	150	4,237	
E08000010	Wigan	GM		742	113	407	59	65	509	62	65	116	2,136	
Grand Total				3,481	3,786	11,568	3,466	3,143	6,157	5,232	3,992	5,835	2,486	49,147

Appendix Table A104 - Moves within GM Year to Mid 2012

Sum of Moves_2012			InLA E08000001 Bolton GM	INLA_Name E08000002 Bury GM	Into_GM E08000003 Manchester GM	E08000004 Oldham GM	E08000005 Rochdale GM	E08000006 Salford GM	E08000007 Stockport GM	E08000008 Tameside GM	E08000009 Trafford GM	E08000010 Wigan GM	Grand Total	
OutLA	OutLA_Name	Out_GM												
E08000001	Bolton	GM		746		552	82	119	606	81	71	125	838	3220
E08000002	Bury	GM		781		808	97	495	683	133	104	163	116	3381
E08000003	Manchester	GM		604	1154		1356	990	2566	3021	1613	3250	371	14925
E08000004	Oldham	GM		100	152	1025		904	211	158	749	98	82	3479
E08000005	Rochdale	GM		200	589	775	847		196	116	144	136	82	3086
E08000006	Salford	GM		793	791	2525	190	191		316	220	736	739	6501
E08000007	Stockport	GM		123	95	1964	105	81	246		889	451	69	4021
E08000008	Tameside	GM		102	118	1052	653	171	263	772		188	53	3371
E08000009	Trafford	GM		157	145	2289	101	105	743	456	152		116	4264
E08000010	Wigan	GM		810	152	406	60	69	591	79	48	119		2334
Grand Total				3670	3942	11395	3490	3125	6106	5133	3989	5267	2466	48582

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Appendix Table A105 - Moves within GM Year to Mid 2011

Sum of Moves_2011			InLA E08000001	INLA_Name E08000002	Into_GM E08000003	E08000004	E08000005	E08000006	E08000007	E08000008	E08000009	E08000010	Grand Total	
OutLA	OutLA_Name	Out_GM	Bolton GM	Bury GM	Manchester GM	Oldham GM	Rochdale GM	Salford GM	Stockport GM	Tameside GM	Trafford GM	Wigan GM		
E08000001	Bolton	GM			585	536	94	129	548	90	63	139	778	2,962
E08000002	Bury	GM		690		787	130	526	634	91	120	181	134	3,293
E08000003	Manchester	GM		535	1,106		1,047	980	2,449	2,514	1,603	3,138	430	13,801
E08000004	Oldham	GM		113	126	992		803	198	145	687	115	67	3,247
E08000005	Rochdale	GM		164	583	726	774		240	131	168	137	82	3,004
E08000006	Salford	GM		690	748	2,282	200	273		352	229	800	711	6,285
E08000007	Stockport	GM		78	88	1,608	87	94	204		709	346	74	3,287
E08000008	Tameside	GM		79	93	1,046	647	172	234	718		154	66	3,209
E08000009	Trafford	GM		122	165	2,227	73	115	728	378	127		141	4,077
E08000010	Wigan	GM		808	86	398	32	67	498	69	61	114		2,132
Grand Total				3,277	3,578	10,603	3,085	3,158	5,733	4,488	3,766	5,124	2,483	45,292

Appendix Table A201 - International Migration Indicators - NINOs. ([Back to report A201](#))

Area Code	Area Name	National Insurance Number Registrations to non-UK Residents										
		2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015
E08000001	Bolton	2,092	1,694	2,350	2,090	1,792	1,944	1,863	1,503	1,827	2,020	2,200
E08000002	Bury	968	1,129	1,322	844	773	859	844	635	737	866	1,047
E08000003	Manchester	10,714	9,813	12,413	9,932	9,892	12,117	12,764	8,986	10,156	12,928	13,499
E08000004	Oldham	1,214	1,174	1,509	1,141	1,204	1,300	1,336	921	987	1,507	1,850
E08000005	Rochdale	1,035	1,196	1,573	1,093	930	1,032	1,109	789	895	1,005	1,320
E08000006	Salford	2,748	2,751	3,624	2,821	2,629	3,007	3,135	2,445	3,006	3,973	4,129
E08000007	Stockport	784	932	1,153	804	753	830	672	640	663	806	867
E08000008	Tameside	769	902	1,161	744	656	711	694	555	630	837	861
E08000009	Trafford	1,583	1,516	1,792	1,338	1,013	1,069	1,178	803	1,116	1,357	1,418
E08000010	Wigan	914	914	1,326	1,101	988	872	752	562	621	864	1,226
E11000001	Greater Manchester	22,821	22,021	28,223	21,908	20,630	23,741	24,347	17,839	20,638	26,163	28,417

Source : ONS LAMI Tool. © Crown Copyright.

Appendix Table A202 - International Migration Indicators - GP Registrations. [\(Back to report A202\)](#)

Area Code	Area Name	GP Registrations to non-UK Residents										
		Mid 2005	Mid 2006	Mid 2007	Mid 2008	Mid 2009	Mid 2010	Mid 2011	Mid 2012	Mid 2013	Mid 2014	Mid 2015
E08000001	Bolton	2,383	2,198	2,274	2,436	2,571	2,159	2,403	2,211	2,494	2,574	2,646
E08000002	Bury	963	1,084	1,185	1,164	1,109	772	939	908	869	817	1,174
E08000003	Manchester	12,429	12,451	14,051	13,624	14,092	14,171	15,886	14,378	14,417	15,976	17,321
E08000004	Oldham	1,357	1,550	1,632	1,541	1,471	1,248	1,446	1,485	1,468	1,526	2,112
E08000005	Rochdale	1,323	1,496	1,459	1,557	1,276	1,118	1,281	1,124	1,176	1,262	1,545
E08000006	Salford	2,511	2,987	3,335	3,249	3,428	3,427	3,704	3,713	3,680	4,128	4,244
E08000007	Stockport	925	961	982	1,031	816	636	569	707	676	746	819
E08000008	Tameside	672	818	1,058	961	866	740	618	721	693	783	903
E08000009	Trafford	1,492	1,656	1,804	1,584	1,430	1,181	1,248	1,171	1,245	1,518	1,329
E08000010	Wigan	1,003	1,168	1,518	1,432	1,364	967	875	681	739	837	1,006
E11000001	Greater Manchester	25,058	26,369	29,298	28,579	28,423	26,419	28,969	27,099	27,457	30,167	33,099

Source : ONS LAMI Tool. © Crown Copyright.

Appendix Table A203 - International Migration Indicators - Births to Non-UK Born Mothers. ([Back to Report A203](#))

Area Code	Area Name	% Births to non-UK born Mothers										
		2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015
E08000001	Bolton	18.6	18.9	20.3	23.4	22.1	22.1	22.5	22.6	25.2	25.7	29.0
E08000002	Bury	14.0	14.6	16.2	17.6	16.4	17.7	17.1	16.9	17.1	16.8	19.1
E08000003	Manchester	35.9	37.6	40.7	42.3	41.3	41.8	42.2	43.5	43.9	44.3	46.2
E08000004	Oldham	26.4	29.5	30.1	29.5	30.2	30.9	27.9	28.6	28.8	29.3	31.4
E08000005	Rochdale	20.9	22.2	22.4	24.4	23.8	23.5	22.7	23.6	22.4	24.8	23.4
E08000006	Salford	15.1	15.2	17.5	20.1	22.1	22.4	22.8	23.1	24.9	27.7	26.6
E08000007	Stockport	8.6	9.2	10.9	10.6	11.1	11.1	11.9	11.6	11.9	10.8	11.9
E08000008	Tameside	11.9	13.4	12.1	13.5	13.7	13.0	13.9	14.3	14.6	14.6	15.6
E08000009	Trafford	15.1	16.4	16.4	17.9	18.4	18.5	19.3	18.7	19.7	21.9	20.4
E08000010	Wigan	5.6	5.4	5.6	6.7	7.3	7.4	7.3	6.9	8.9	9.1	8.9
E11000001	Greater Manchester	19.2	20.5	21.8	23.1	23.1	23.3	23.4	23.8	24.6	25.4	26.4
E92000001	England	21.5	22.7	24.0	24.9	25.4	25.9	26.2	26.7	27.3	27.8	28.4

Source : ONS LAMI Tool. © Crown Copyright.

Appendix Table A204 - International Migration Indicators - Estimates of % Non-UK born Population. ([Back to Report A204](#))

Area Code	Area Name	Estimates of % Non-UK born Population										
		2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015
E08000001	Bolton	3.4%	3.8%	6.0%	5.6%	7.4%	6.2%	6.5%	6.1%	6.5%	6.1%	6.1%
E08000002	Bury	3.4%	3.3%	5.0%	3.9%	3.3%	4.4%	4.4%	3.3%	3.8%	4.3%	4.8%
E08000003	Manchester	10.4%	13.5%	16.1%	16.3%	17.2%	17.6%	18.7%	17.8%	17.7%	16.3%	16.9%
E08000004	Oldham	4.1%	4.6%	5.5%	5.5%	6.3%	5.4%	4.9%	5.4%	6.2%	6.2%	7.5%
E08000005	Rochdale	2.9%	3.9%	4.4%	5.3%	5.3%	4.8%	5.2%	4.8%	7.1%	6.7%	8.5%
E08000006	Salford	4.1%	5.0%	6.8%	7.1%	8.4%	8.7%	8.7%	9.8%	11.4%	10.5%	13.2%
E08000007	Stockport	2.2%	2.9%	2.9%	3.2%	3.6%	3.2%	3.6%	5.0%	3.9%	3.5%	4.2%
E08000008	Tameside	2.4%	2.3%	2.8%	2.8%	3.7%	4.1%	4.6%	4.1%	3.7%	5.5%	6.8%
E08000009	Trafford	4.2%	3.7%	4.1%	5.9%	4.5%	6.3%	6.6%	5.7%	3.9%	5.2%	6.4%
E08000010	Wigan	1.6%	1.3%	2.0%	2.3%	2.2%	1.6%	2.2%	1.9%	2.2%	3.1%	4.4%
E11000001	Greater Manchester	4.3%	5.2%	6.4%	6.6%	7.1%	7.2%	7.7%	7.5%	7.7%	7.7%	8.7%
E92000001	England	6.0%	6.7%	7.2%	7.5%	7.7%	7.8%	8.3%	8.4%	8.5%	9.0%	9.3%

Source : ONS LAMI Tool. © Crown Copyright.

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Appendix Table A205 - International Migration Indicators - Short Term Migrants. ([Back to Report A205](#))

Area Code	Area Name	Short Term International Migration															
		To Mid 2008	To Mid 2008 %	To Mid 2009	To Mid 2009 %	To Mid 2010	To Mid 2010 %	To Mid 2011	To Mid 2011 %	To Mid 2012	To Mid 2012 %	To Mid 2013	To Mid 2012 %	To Mid 2013	To Mid 2013	To Mid 2014	To Mid 2014
E08000001	Bolton	292	0.1%	196	0.1%	267	0.1%	193	0.1%	221	0.1%	237	0.1%	237	0.1%	301	0.1%
E08000002	Bury	151	0.1%	81	0.0%	129	0.1%	46	0.0%	140	0.1%	247	0.1%	247	0.1%	231	0.1%
E08000003	Manchester	2,886	0.6%	2,501	0.5%	2,618	0.5%	2,256	0.4%	2,400	0.5%	2,643	0.5%	2,643	0.5%	4,078	0.8%
E08000004	Oldham	79	0.0%	49	0.0%	65	0.0%	65	0.0%	99	0.0%	151	0.0%	151	0.1%	196	0.1%
E08000005	Rochdale	142	0.1%	76	0.0%	85	0.0%	63	0.0%	98	0.0%	107	0.0%	107	0.1%	140	0.1%
E08000006	Salford	521	0.2%	369	0.2%	479	0.2%	277	0.1%	384	0.2%	633	0.2%	633	0.3%	795	0.3%
E08000007	Stockport	117	0.0%	68	0.0%	86	0.0%	71	0.0%	78	0.0%	115	0.0%	115	0.0%	114	0.0%
E08000008	Tameside	95	0.0%	39	0.0%	59	0.0%	37	0.0%	94	0.0%	65	0.0%	65	0.0%	100	0.0%
E08000009	Trafford	188	0.1%	104	0.0%	133	0.1%	112	0.0%	104	0.0%	138	0.0%	138	0.1%	168	0.1%
E08000010	Wigan	220	0.1%	142	0.0%	146	0.0%	88	0.0%	78	0.0%	133	0.0%	133	0.0%	137	0.0%
E11000001	Greater Manchester	4,691	0.2%	3,625	0.1%	4,067	0.2%	3,208	0.1%	3,697	0.1%	4,468	0.1%	4,468	0.2%	6,260	0.2%
E92000001	England	128,198	0.2%	102,000	0.2%	112,973	0.2%	93,438	0.2%	107,195	0.2%	117,172	0.2%	117,172	0.2%	159,496	0.3%

Source : ONS LAMI Tool. © Crown Copyright⁶⁷.

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<https://www.ons.gov.uk/file?uri=/peoplepopulationandcommunity/populationandmigration/migrationwithintheuk/datasets/localareamigrationindicatorsunitedkingdom/current/v1.0localareamigrationindicatorsaug16.xls>

Appendix Table A206 - Greater Manchester Higher Education Students 2010/11 to 2014/15. ([Back to Report A206](#))

Greater Manchester HE Students by Domicile				
Year	UK	EU	Non-EU	Total Students
2010/11	87,965	5,215	12,795	105,975
2011/12	87,150	5,160	13,040	105,350
2012/13	80,655	4,535	12,150	97,340
2013/14	78,125	4,430	12,845	95,400
2014/15	77,195	4,350	13,715	95,260
Year	% UK	% EU	% Non-EU	Total Students
2010/11	83%	5%	12%	105,975
2011/12	83%	5%	12%	105,350
2012/13	83%	5%	12%	97,340
2013/14	82%	5%	13%	95,400
2014/15	81%	5%	14%	95,260

Note: 2015/16 data available in January, 2017

Source: HESA Annual Statistics. All Modes (Full Time/Part Time) Graduate & Postgraduate ⁶⁸

Includes University of Manchester, Manchester Metropolitan University, University of Bolton & University of Salford

⁶⁸ <https://www.hesa.ac.uk/data-and-analysis/students/overviews>

Glossary

A8 - EU Accession Countries. Czech Republic, Estonia, Hungary, Latvia, Lithuania, Poland, Slovakia, Slovenia

AGMA - Association of Greater Manchester Authorities

BSPS - British Society for Population Studies

CLIP - Central and Local Information Partnership

CPRE - Campaign to Protect Rural England

DCLG - Department for Communities and Local Government

DWP - Department for Work and Pensions

GM - Greater Manchester

GMSF - Greater Manchester Spatial Framework (

GVA - Gross Value Added which is the increase in the value of the economy due to the production of goods and services.

HESA - Higher Education Statistics Agency

HMRC - Her Majesty's Revenue and Customs

LAMI - Local Authority Migration Indicator (ONS Tool for Migration analysis)

LPEG - Local Plans Expert Group

LTIM - Long Term International Migration

MCC - Manchester City Council

MYEs - Mid Year Estimates (ONS)

NWRSS - North West Regional Spatial Strategy

NISRA - Northern Ireland Statistical Research Agency

NOMIS - National Online Manpower Information System (ONS)

NRS - National Records Scotland

NPP - National Population Projections (ONS)

NPPF - National Policy Planning Framework

OAHN - Objectively Assessed Housing Need

OBR - Office for Budgetary Responsibility

OE- Oxford Economics

ONS - Office for National Statistics

PASC - Public Administration Select Committee

POST - Parliamentary Office Science & Technology

RFMYEs - Rolled Forwards Mid Year Estimates (ONS)

SHMA - Strategic Market Housing Assessment

SHLAA - Strategic Housing Land Availability Assessment

SNPPs - Sub-National Population Projections (ONS)

SNHPs - Sub-National Household Projections (DCLG)

T&CP - Town & Country Planning

UPC - Unattributable Population Change

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Appendix Two - Brandon Lewis MP Letter



Department for Communities and Local Government

Members of Parliament for English Constituencies
House of Commons
London
SW1A 0AA

Brandon Lewis MP

Minister of State for Housing and Planning

Department for Communities and Local Government
Fry Building
2 Marsham Street
London
SW1P 4DF

Tel: 0303 44 43430
E-Mail: brandon.lewis@communities.gsi.gov.uk
www.gov.uk/dclg

07/06/2016

Dear Colleague,

Development on brownfield and Green Belt land

This Department has received a large number of identical letters, forwarded by Members of Parliament, which concern the National Planning Policy Framework, housing provision, and the need to re-use brownfield land and protect Green Belt. These concerns arise from our recent consultation on proposed changes to the Framework, and from recent misreporting of potential development on Green Belt land. I am writing to clarify the Government's position.

The claims made in the reports are misleading and speculative as they include figures based on unadopted Local Plans and unapproved planning applications. The Government has put in place the strongest protections for the Green Belt. The Framework makes it clear that inappropriate development may be allowed only where very special circumstances exist, and that Green Belt boundaries should be adjusted only in exceptional circumstances, through the Local Plan process and with the support of local people. We have been repeatedly clear that demand for housing alone will not change Green Belt boundaries. However, we recognise that it is local authorities, working with their communities and with detailed local knowledge, which are best placed to decide the most sustainable, suitable and viable sites

for new homes. The Housing and Planning Act 2016 has increased local people's power to plan their areas with new measures to speed up and simplify neighbourhood planning.

This Government is committed to re-using brownfield sites for housing, and we have undertaken to ensure that 90 per cent of brownfield land suitable for housing will have planning permissions for new homes in place by the end of this Parliament. To support this policy, we have introduced local brownfield registers; accelerated disposal of public sector brownfield for housing – with a commitment to release land for at least 160,000 homes by 2020; extended permitted development to give new life to thousands of buildings; and set up a Home Building Fund to provide £2 billion of loans for infrastructure and land remediation to support large housing sites. We expect 50% of this Fund to be spent on brownfield land. In addition, £1.2 billion of our £2.3 billion starter homes funding will support brownfield site preparation; delivering at least 30,000 starter homes.

Green Belt remains constant at around 13% of England, and in 2014-15 there was only a 0.1% reduction in size as a result of Local Plan reviews. Furthermore, only 0.02% of Green Belt was converted to residential use, after consulting local people. Taking account of land reclassified as national park, the Green Belt is actually 120 square miles larger than in 1997.

BRANDON LEWIS

Appendix 3 - Gavin Barwell MP Letter



Department for
Communities and
Local Government

Councillor John Clancy
Leader of Birmingham City Council
Council House
Victoria Square
Birmingham
B1 1BB

Gavin Barwell MP
Minister of State for Housing and Planning

*Department for Communities and Local
Government*
4th Floor, Fry Building
2 Marsham Street
London SW1P 4DF

Tel: 0303 444 3430
Fax: 0303 444 3986
E-Mail: gavin.barwell@communities.gsi.gov.uk
www.gov.uk/dclg

Date: 24 NOV 2016

Dear Councillor Clancy

Birmingham Development Plan 2031

On 29 April 2016 we received a request to call in the Birmingham Development Plan 2031 ("the Plan") from Rt Hon. Andrew Mitchell, MP for Sutton Coldfield. The request set out concerns about a proposal for 6,000 new homes on Green Belt land in Sutton Coldfield known as the Langley Sustainable Urban Extension and other matters related to the Plan.

Plans are the primary basis for identifying what development is needed in an area and for deciding where it should go. In the preparation of a Plan, we recognise there are key considerations that should be addressed.

In order to ensure the efficient and appropriate use of land when planning to meet housing need, Local Plans should seek densities that will make best use of each development site, while taking in to consideration local circumstances.

The National Planning Policy Framework is clear that Green Belt should only be altered in exceptional circumstances through the preparation or review of the Local Plan. Where it is necessary to consider revision of the Green Belt, this review should be robust in its justification for any alteration.

Where it is expected that neighbouring authorities will be required to help meet the housing need of a local planning authority area, the duty to cooperate has an important role to play. The duty is intended to assist local planning authorities to produce effective and deliverable policies on strategic cross boundary matters.

On 26 May 2016, in exercise of the powers under section 21A of the Planning and Compulsory Purchase Act 2004 (inserted by section 145(5) of the Housing and Planning Act 2016), we directed Birmingham City Council ("the Council") not to take any step in connection with the adoption of the Plan ("the Holding Direction").

We have now considered the concerns set out in the letter of Rt Hon. Andrew Mitchell MP and the report of the Inspector appointed to examine the Plan.

The Inspector set out in his report that the vast majority of sites proposed in the Plan are on brownfield land and the Plan has a density policy that 'seeks to maximise the yield from each development site'. We agree with the Inspector's conclusion that even when taking consideration of this approach, the scale of potentially unmet need in the city is "exceptional and possibly unique".

We further note the Inspector's findings that though the Plan does not accommodate provision for all of Birmingham's housing need within the city, the Council has taken steps with regard to the duty to cooperate to address the issue and persuade other Local Planning Authorities to act if this becomes necessary to address the shortfall.

Taking in to account the factors above, we see no ground to differ from the conclusions the Inspector appointed to examine the Plan has reached. We are satisfied that Birmingham has taken a robust approach that is consistent with the National Planning Policy Framework.

After careful consideration of the concerns raised, we are satisfied that Birmingham City Council should be able to take further steps in connection with the adoption of the Plan and the Holding Direction is hereby withdrawn.

*Yours sincerely
Gavin*

GAVIN BARWELL MP