

# Culcheth and Glazebury Parish Council and Croft Parish Council

<p>Culcheth and Glazebury Parish Council Clerk to the Council Mr. M. Durrington 9, Wigshaw Lane, Culcheth WA3 4LX Culcheth.clerk@btinternet.com 01925 733619</p>	<p>Croft Parish Council Clerk to the Council Mr. M. Pope Unit K1, Taylor Business Park Warrington Road, Risley WA3 6BH <a href="mailto:croftparishcouncil@gmail.com">croftparishcouncil@gmail.com</a> 01925 733766</p>
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## 1 Introduction

This document has been developed and agreed by **Culcheth and Glazebury and Croft Parish Councils** as their response to the GMSF revised draft January 2019. These communities are immediately to the west of Salford and to the south of Wigan. Because of the shape of the borough boundaries, Wigan to a large extent envelops Culcheth and Glazebury and Croft and therefore planning decisions within Greater Manchester have a big impact on the quality of life in our communities and we have a significant interest in how GMSF develops. Many residents of our parishes work, study, or recreate in Greater Manchester. While it is understood that Warrington Borough Council has been consulted as part of the Duty to Co-operate, the Parish Councils have had no contact from Greater Manchester.

## 2 Summary

The latest draft of GMSF is an improvement on the previous (2016) version and outlines a generally positive vision. The stated focus on sustainability, including the re-use of brownfield land and public transport is very welcome. The first GMSF draft had fundamental flaws, and we are pleased that many have been addressed. We understand the logic for designating a 'Wigan-Bolton growth corridor. We welcome policies on:

- Brownfield-first approach to the release of sites for development.
- The concept of a Wigan-Bolton growth corridor (but not the details).
- Priority on town centres for more residential development.
- Some reduction in Green Belt release.
- Net Enhancement of Biodiversity and Geodiversity (particularly regarding the Mosses)
- Sustainable travel and placemaking policies.

But draft 2 does not meet its own aspirations. large Green Belt releases are still proposed particularly for logistics around the M6, M61 and M60 that are entirely road-based that would directly affect the quality of life in our communities. Logistics is wasteful of land, brings a low density of poorly paid jobs, and reinforces a car and lorry dependency that works against other stated plan aims including air quality, climate change, economic growth, and overall quality of life. Logistics sites are a necessary evil, but they should not be encouraged. We believe further significant changes would take the general approach in new draft further and create a plan that would make a real difference to Greater Manchester and the surrounding communities:

- Refocussing economic activity away from logistics and towards education and advanced manufacturing with higher skill levels and pay.
- Consequent reduction in the need to wastefully allocate land for logistics including reduction or removal altogether of the additional buffer 'to give choice'.
- Removal of the most damaging Green Belt allocations for logistics.
- Removal of damaging new road proposals that work against other plan policies.
- More clarity, certainty and evidence for public transport proposals.

### 3 Employment

The need for employment land has been deliberately inflated:

- An accelerated growth scenario has been adopted with no justification other than an ambition to grow. As we pointed out in our previous response there is no obvious place for all the people to come from, or a risk analysis of what happens if they don't.
- As well as a large allowance for market 'choice' so that the development sector can cherry pick sites, a large buffer has also been included. National Planning Policy Framework (NPPF) mentions 'buffer' in terms of land supply five times, but these are all in relation to housing supply. There is no suggestion in NPPF that there needs to be a buffer for employment land, and removal of this element would allow less Green Belt land to be allocated.

The overall effect of these three 'allowances' (accelerated growth, extra land for market choice and the buffer) means that vastly more land is allocated than will be developed. The extra is almost exclusively on current Green Belt. It is natural that developers will gravitate to these sites and recycling of urban employment sites will effectively cease, along with any hope of providing jobs within existing urban areas. We think that 50% more land is allocated than needed.

#### 3.1 Logistics

The revised GMSF retains an **unhealthy focus on logistics** for employment – a sector that needs huge amounts of Green Belt land near Motorways and provides a low density of poorly paid jobs. Of the total allocated for employment, less than a third is brownfield, and over half is green belt.

Logistics is an activity with low employment density, generally poorly paid jobs and where Greater Manchester is competing with Merseyside and Warrington which have some competitive strengths (e.g. deep-sea port at Liverpool, M6 and WCML at Warrington). Logistics may be an opportunity, but it is not a key opportunity. Large sheds with automatic picking machines along the M61/M62/ M6 won't solve the employment problems of the Northern Boroughs.

It would be more logical to split the allocation between B2 (Manufacturing) and B8 (Warehousing) and constrain the latter. It should be possible to reduce the total allocation and take less green belt.

GMSF states '*Many logistics sites in Greater Manchester will be reliant on road-based freight, taking advantage of the strategic location within the national motorway network. This reinforces the importance of delivering the strategic highway improvements identified in the previous policy*'. (10.54). This is in direct contradiction of policies on air quality, climate change and the environment.

Concentration on one industry (logistics) also contradicts national policy. NPPF 104 suggests '*Planning policies should: a) support an appropriate mix of uses across an area, and within larger scale sites, to minimise the number and length of journeys needed for employment ...*'. The focus on logistics (over half of the allocated land is expected to be logistics and associated infrastructure) and the car-based nature of this development means that the terms of NPPF 104 cannot be met.

### 3.2 Wigan-Bolton growth corridor

We recognise the need to boost competitiveness to the north of GM in Bolton, Bury, Oldham, Rochdale, Tameside, Wigan, and west Salford. But we oppose the current nature of the proposed Wigan-Bolton growth corridor (**Policy GM-Strat 8**). There is already an M6 logistics 'hub' in Wigan (extending into Warrington, St Helens and West Lancashire) with a major cluster of existing and planned warehousing and distribution activity. The growth corridor is completely focused around a proposed new road (a Bus Rapid Transit corridor and more intense use of the Wigan-Atherton-Manchester rail line are undefined and probably undeliverable). The new road infrastructure will connect junction 26 of the M6 (which is also the junction for the M58 motorway that provides a direct connection to the Port of Liverpool) and junction 5 of the M61, running to the south of Wigan Town Centre, west of Atherton and east of Westhoughton. This transport infrastructure will generate very large amounts of extra traffic in the north-west of Greater Manchester, increase local congestion and entrench car-dependency further.

The plan proposes major releases of Green Belt land to provide for motorway-dependent logistics development, supported by extensive new road building and other highway capacity increases. It:

- Is wasteful of land, including good quality agricultural land.
- Would destroy the integrity of the Green Belt.
- Bring a low density of poorly paid and low skilled jobs.
- Would entrench car dependency both in Wigan and the wider area making residents dependent on congested roads for work, education, shopping and leisure trips.
- Increase inequality.
- Increase climate change gas emissions and reduce air quality.
- Is ultimately unsustainable and incompatible with a high quality of life either for existing or new residents.

While lip service is paid to '*advanced manufacturing*', what this might mean (what sort of manufacturing, what sort of companies, supply chain considerations?) is not developed in the plan, and it is not clear what is proposed – a new car plant, or a graphene works, or high-tech workshops? Most quality employment growth is focussed in town and city centres, based on smaller companies, and a highly educated workforce. Quality of life is a key criteria and location is often determined by:

- Nearby higher-level cultural facilities (such as in Manchester City Centre)
- Clusters of similar companies (such as Salford Quays)
- Areas with a highly educated workforce (such as University and College clusters)
- Cheap and flexible accommodation (such as Rope Walks, Liverpool), or
- Heritage towns with good access to a quality environment.

Urban areas in Greater Manchester outside the city centre should be able to create the conditions for growth of quality jobs. But this will require attention and resources to be focussed on town centres and existing buildings. Stockport is leading GM with a Mayoral Development Corporation. Wigan (and Bolton) should follow this lead, with the creation of a better quality of life and new employment within their town centres, rather than at Motorway junctions. This is a more difficult path to follow than drawing a red line around sites near motorway junctions and allocating them for warehouses. But an alternative approach is needed if Greater Manchester is to prosper and have a good quality of life

### 3.3 M62 North-East Corridor

A similar unhealthy concentration on logistics is also proposed on the M62 corridor from junction 18 (the confluence with the M60 and M66) to junction 21 (Milnrow), extending across parts of Bury,

Rochdale and Oldham. Three major sites are proposed to be removed from the Green Belt: GM 1 'Northern Gateway', GM 2 'Stakehill' and GM 3 'Kingsway South'. Associated large scale highway capacity increases will also require significant Green Belt land. A few unspecified and un-costed public transport measures are suggested, but given the Motorway focussed nature of the sites, the lack of funding, and the complex delivery and funding mechanisms for public transport it can safely be assumed almost all goods and employees will be dependent on roads. **Sites GM1, GM2 and GM3 should not be removed from the Green Belt.**

### 3.4 Employment site allocation

The GMSF draft proposes to remove several large sites from the current Green Belt in the Wigan-Bolton growth corridor to meet the assumed demand for logistics. These are:

- GM 5 **Chequerbent North** (M61 J5)
- GM 6 **West of Wingates** (M61 J6)
- GM 47 **Land South of Pennington**
- GM 48 **M6, Junction 25**
- GM 51 **West of Gibfield**

#### 3.4.1 GM5 Chequerbent North (M61 J5)

25,000sqm of B2 and B8 at M61 J5. This is the last gap between Westhoughton and the built-up area of Bolton (which starts just to the NE of M61 J5 at Hunger Hill) and therefore performs a vital Green Belt function in keeping these two communities separate. Should it be developed, then Westhoughton will have visually and functionally merged with the main Bolton urban area. The location means that development for logistics (B8) rather than B2 is inevitable. GM5 is described as having 'no obstacles to construction'. This is because the site contributes significantly to the openness of the countryside. It's loss for the few jobs created by logistics would be a crime.

**We oppose designation of GM5 for employment use.**

#### 3.4.2 GM6 West of Wingates (M61 J6)

440,000sqm B2 and B8 (large scale distribution and apparently advanced manufacturing). This forms part of the gap between Westhoughton and Aspull (Westhoughton has already effectively merged with Hindley) and development will substantially join all these communities in one continuous urban area should GM5 also be developed. The text suggests the site would allow a continuing supply of land for warehousing and distribution – so it is unlikely that 'advanced manufacturing' would be provided.

The site will be served by a new Westhoughton western bypass from the A6; undefined but probably token '*bespoke bus services linking Westhoughton to Horwich Parkway and Middlebrook*' are proposed that might give an '*opportunity to provide bus routes along this link to provide services between nearby stations at Westhoughton and Horwich Parkway*'. Yes, of course. This is simply Greenwash.

**We oppose designation of GM5 for employment use**, however we would support reservation for advanced manufacturing only.

#### 3.4.3 GM47 Land South of Pennington

160,000 sqm of employment land. This is a key part of the gap (along with GM50 Pocket Nook) between Golborne and Culcheth which is at its narrowest at this point. The development would result in ribbon development along the East Lancs Road and be completely road based, relying on the A580 which is already severely congested. Extra traffic would spill out onto local roads exacerbating already intolerable conditions in Culcheth.

#### 3.4.4 GM48 M6, Junction 25

140,000 sqm of B2 and B8. This is described as *'large, relatively unconstrained'* and has a *'long visible frontage'* (to the M6). This underlines the fact that development for logistics would be a visual disaster, creating a continuous ribbon of warehouse development along the M6. Again, the location means that development for logistics (B8) rather than B2 is inevitable and if the allocation is retained it should be made clear what the proportion of B2 and B8 is intended.

It is suggested that *'The site will provide a robust green infrastructure corridor between the employment uses and residential development to the north at Winstanley. In addition to safeguarding residential amenity, this will open up the site for wider public access and provide enhanced walking and cycling opportunities for local resident'*. **We wonder if this is a joke inserted by the planners** as it is obvious that the urbanisation, visual degradation and entrenchment of road-dependency with consequent deterrence to active travel, health, public access and walking and cycling will be disastrous.

#### **We oppose designation of GM48 for employment use**

#### 3.4.5 GM50 Pocket Nook

600 homes and 15,000 sqm employment. This is a key part of the gap between Golborne and Culcheth (along with GM47 Land South of Pennington) which is at its narrowest at this point. The development would result in ribbon development along the East Lancs Road and be completely road based, relying on the A580 which is already severely congested. Extra traffic would spill out onto local roads exacerbating already intolerable conditions in Culcheth. Opportunities for sustainable or active travel are limited. The environment is dominated by heavy lorries attracted by the numerous logistics developments; walking and cycling are unlikely to be attractive options. Extensive defensive measures to reduce noise and pollution are unlikely to be effective. As noted, the site is remote from rail stations. Given the imperative to tackle air quality and climate change and the availability of land near rail stations, it is irresponsible to allocate a site so far from a rail station. An extension to the Leigh busway is postulated. But the original Leigh Busway took 15 years to deliver and any public transport development dependent on central Government funds cannot be used to justify this development.

#### 3.4.6 GM51 West of Gibfield

700 dwellings and 45,500 sqm of B1, B2 and/or B8. This is a major development proposed on a significant area of Green Belt that currently provides vital separation of Atherton and Westhoughton. Development would remove the open gap and effectively merge these communities. This site is further from the motorway and is unsuitable for B8 distribution uses.

#### **We oppose designation of the employment use element of GM48**

### 3.5 Transport access for Wigan-Bolton Growth Corridor

All these locations would be served by new roads and by unspecified and unfunded public transport schemes. It is suggested that Wigan-Bolton Growth Corridor might include *'increased use of the existing Wigan-Atherton-Manchester rail line potentially including conversion to allow for metro/tram-train services. and Rapid Bus Transit'*. Apparently, these *'could have a major regenerative role'*.

These transport proposals are flawed as they:

- Ignore that motorway journeys are already unreliable for existing businesses and commuters and yet GMSF treat them as having unlimited capacity for expansion.
- Entrench car dependency across large parts of the north of Greater Manchester

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- Make air quality worse
- Encourage additional climate change gas emissions from encouraging more traffic
- Public transport proposals are un-costed and unfunded
- Increased traffic and the negative environmental effects will be spread across the region, including communities to the north of Warrington

The 'Race to the Bottom' where all local authorities compete to offer the biggest Green Belt site to logistics operators is a zero-sum game which brings few jobs, but many of the problems of road-dependency, including locking-in poor health for the next generation.

## 4 Transport proposals and integration

The GMSF introduction states '*Road congestion is amongst the most severe in the UK, with knock-on impacts on to air quality. The need to decarbonise our economy means we need to look at low carbon energy generation and storage, retrofitting of buildings, and low carbon transport.*'

Yet GMSF goes on to outline plans to spend very large sums of money on additional road capacity (including a major new road between the M6, Wigan, M61 and Bolton) and are consulting on a [GM draft Infrastructure Framework and a Transport Strategy 2040](#). While the road schemes are mostly already detailed and there is a clear route to implementation, the framework and Transport Strategy also includes some more sketchy public proposals for delivery after 2025 including:

- New stations at Kenyon Junction and other potential site in open land and Green Belt.
- BRT extension to Lowton and Golbourne

### 4.1 New roads and additional highway capacity

We have concerns about and oppose the **new roads**. These schemes actively work against the aims and objectives of GMSF including key parts of chapters 2, 5, 8, 9 10. They are unsustainable and environmentally damaging because they:

- Encourage additional car commuting and car dependency that will reduce the amount of active travel and damage health
- Cause additional modal transfer away from public transport, walking and cycling
- Create additional climate change gas emissions
- Create additional particulate and NOx emissions that lead to hundreds of early deaths
- Create further pressure for development on open land and in the Green Belt
- Exclude people without access to cars

Given the new emphasis on urban regeneration and town centre housing in the revised GMSF, these schemes are simply not necessary to implement the strategy.

The M6-61 link will create a new strategic route that will generate significant additional traffic as well as encouraging modal shift away from sustainable modes (public transport, walking and cycling) towards cars. This will affect areas well away from the immediate area of the new road and create region-wide car-dependence. It is time that the more backward GM local authorities were weaned off roads (and logistics) as the only way to create jobs. It is no accident that the most prosperous parts of GM (and indeed England) are those that have the best environment, the best educated workforces and economies with the least car-dependency.



We support the statement - '**Ultimately, this plan makes a clear decision to consider people and place over the movement of traffic**' (Streets for All 10.60). This statement stands alone and is not reflected in the policies or proposals of much of the rest of GMSF.

#### 4.2 Tram Train

The potential of **Tram-Train** features prominently in GMSF and the transport delivery plans. While Tram-Train could be appropriate in some circumstances, it is not the panacea suggested. It:

- Not a cheap option – frequently it is more expensive than a heavy or light rail option.
- Only one scheme is in operation in the UK – this opened in 2018 ten years late and an incredible five times over budget – it may be impossible to deliver further schemes.
- Tram-train schemes are also comparatively rare in northern Europe. Where it does work, transport networks are integrated. There is no realistic chance of this integration being achieved in the UK soon.
- GM has a long list of potential tram-train schemes – the Atherton line is not a priority.

#### 4.3 New rail stations

We also have concerns about the **potential new rail stations at Kenyon Junction and other sites** in open land and Green Belt. While new stations are not intrinsically bad, the proposal at Kenyon Junction would bring extensive development. It has been examined extensively at Public Enquiry and rejected. There would need to be an incredibly persuasive case for this proposal to be resurrected.

The record of Greater Manchester in providing new rail stations is poor. The last was Horwich Parkway in 1999. No new stations have opened this century. It is not wise or possible to base the sustainability of new development on provision of a station that might not be provided, particularly where the GM new station delivery record is so poor.

#### 4.4 Active travel

The potential for **walking, cycling and placemaking** in creating sustainable developments is mentioned several times, and indeed these are planning tools that have been almost unused in GM in the last couple of decades. They have perhaps the greatest ability to create sustainable neighbourhoods. But their use in mitigating road-based logistics developments is limited and there is no sense in pretending that they can rescue an intrinsically unsustainable development form.

A fundamental weakness of the UK planning system is the poor link between land-use and transport planning, and the inability to guarantee funding for active travel (public transport, walking and cycling) measures. While the reasons for these are varied and outside the scope of GMSF, it is essential that development is not planned for areas unless active travel schemes are authorised, committed and funded. Otherwise these developments will inevitably be car-dependent and cause the health, noise, severance and well-being issues that are explained in the rest of GMSF.

## 5 Climate change and air quality

### 5.1 Climate change and air pollution

**Climate change** is the biggest problem facing the world. The GMSF aspirations and policies are admirable '*The need to decarbonise our economy means we need to look at low carbon energy generation and storage, retrofitting of buildings, and low carbon transport.*'

Andy Burnham has suggested he wants to make Greater Manchester 'the country's first zero-carbon city region, with an ambitious target of 2040. The UK has targeted an 80 per cent reduction by 2050.'

**Air pollution** has been identified as the top environmental risk to human health in the UK, and the fourth greatest threat to public health after cancer, heart disease and obesity. It is one of the biggest public health challenges, shortening lifespans and damaging quality of life for many people (5.28)

GMSF suggests *'Road congestion is amongst the most severe in the UK, with knock-on impacts on to air quality.'*

We support these sentiments, yet the policies on climate change and air quality are undermined by a pattern of Green Belt housing and employment (especially logistics) development that continues car and lorry dependency. This is entrenched by proposals for significant new roads and additional capacity on existing roads. Greater Manchester is at a crossroads and cannot choose to have both additional highway capacity and still pretend it wants to solve climate change and air quality issues.

Low Carbon Transport is aligned to encouraging cars – rather than cycling as the ultimate low-carbon transport method.

The number of journeys is expected to grow by 15%, but GMSF suggests modal shift means that there will be fewer car journeys than now. This implies a heroic increase in public transport, walking and cycling. This is hard to square with the current state of car-dependency in Greater Manchester and the plans to spend very large sums of money on additional road capacity.

## 5.2 Manchester Mosses

GMSF recognises that Greater Manchester contains a wide range of important sites designated for their high nature conservation value, including the Manchester Mosses (8.47); we agree strongly with the comment that *'effective conservation of biodiversity will require more than simply the protection of existing designated sites and priority habitats, particularly given the scale of development proposed in the GMSF'* and support Policy GM-G 10 (Net Enhancement of Biodiversity and Geodiversity).

However, this appears as a standalone policy while significant amounts of Green Belt and other land is allocated for development that will destroy and fragment the Mosses and other important habitats and landscapes. The GMSF environmental and other assessments do not fully understand or assess the cumulative effects. Wigan, Salford and Warrington should create a joint protection plan for the Mosses under the 'Duty to Cooperate' before the allocations in GMSF are confirmed.

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