

## Revised draft Salford Local Plan January 2019

# Response of Culcheth and Glazebury Parish Council and Croft Parish Council

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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 Revised draft Salford Local Plan January 2019. These communities are immediately to the west of Salford. Planning decisions within Salford and Greater Manchester in general have a big impact on the quality of life in our communities and we have a significant interest in how Salford develops. Many residents of our parishes work, study, or recreate in Salford and Manchester. We would welcome discussion on any of the points in our response.

## 2 Summary

We welcome many features in the plan:

- The inclusion of 'A fairer Salford' as the first of the policy chapters, which indicates its importance and that other policies should all be subordinate to the tests of 'fairness'.
- The Key Challenge (2.14 second bullet which places '*Increase average levels of health and educational attainment, and reduce disparities*' ahead of economy, travel and infrastructure.
- Recognition of the importance of the Mosses, including Policy GI3 (Chat Moss) and BG2 (Nature Improvement Areas) as of international standing.
- Focus of future development at higher densities in the successful Salford/Manchester city centre and adjoining areas to take advantage of the location and facilities.
- Tri-modal Port Salford development, but only if it is genuinely multi-modal and there is a mechanism to force it to cease operation if access becomes road-dominated.

However, we think that:

- Housing growth scenarios (set in GMSF) are hopelessly optimistic. If the anticipated growth does not occur, there must be a mechanism to ensure brownfield sites land near the centre are developed and developers cannot 'cherry pick' former Green Belt sites.
- Allowance should be made for housing development on anticipated surplus employment land.
- The allocation of significant parts of the mosses for early development is incompatible with other objectives in the plan to protect them.
- Some of the allocated housing sites may be developable but not deliverable. While they may no longer be part of the Green Belt, they do not necessarily need to be allocated for development in the plan period unless stringent tests are met.

- Specific allowances should be made for logistics to prevent this low value, low skilled and poorly paid use dominating employment allocations
- We object to Policy CT3 which seeks to authorise a wide range of uses including out-of-town retail on the isolated and unsustainable wasteland around the AJ Bell Stadium.

### 3 Manchester Mosses

The plan identifies the importance of the mosses which extend into Wigan and Warrington and are defined by the peaty soils and the flat landscape of former lowland bogs. There was originally 2,650 hectares of lowland raised bog across Chat Moss, one of Western Europe's rarest and most threatened habitats with a unique range of wildlife, but there are now only around 310 hectares of relatively undamaged peat deposits primarily in Salford. The restoration of lowland raised bog can make a major contribution to carbon emission targets, both reducing a significant source of emissions and locking in carbon, as well as supporting nature conservation objectives. Salford contains 1,800 hectares of the best and most versatile agricultural land (grades 1 and 2), all of which is in Chat Moss.

The Great Manchester Wetlands Nature Improvement Area (NIA) was adopted by the Greater Manchester and Cheshire Local Nature Partnerships in May 2013, covers around 48,000 hectares and focusses on the Mosslands.

**We welcome the recognition of the importance of the Mosses, and Policy GI3 (Chat Moss) and Policy BG2 (Nature Improvement Areas).** We note the aims to mitigate the impact of environmental pressures by improving species mobility and make a lasting improvement to some of Britain's rarest habitats by restoring designated sites and priority habitats, improve regional and local connectivity for critical species by creating stepping stones and corridors between habitats and populations; and optimise the carbon storage function of lowland raised bog.

However, **the allocation of significant parts of the mosses for early development is incompatible with the objectives of the policies to protect them.** GM allocations 32 and 33 are on Chat Moss.

#### 3.1.1 GM32 North of Irlam Station (65.1 hectares)

GM32 allocates 1,600 dwellings, the delivery of which is likely to extend beyond the plan period. The site is on the mosses relatively near Irlam station, but this only has two trains per hour (provided at least for the next ten years with diesel trains that are 35-40 years old) with little scope to increase frequency as the line is shared with express trains. The site is otherwise remote from employment, leisure and education facilities and apart from the limited train service, wholly road-dependent.

This suggests that (assuming it is confirmed by GMSF as being excluded from the Green Belt), any development should be at the end of the plan period when better public transport connections (needed anyway for the existing population) can be provided. If this is not possible, then development would fail the tests (GMSF 11.189 to 11.194) and the site would not be deliverable.

#### 3.1.2 GM33 Port Salford Extension

320,000 sqm employment expansion of Port Salford into part of the existing Green Belt to the north and west of Barton Aerodrome. This site has the potential to provide water and rail bulk delivery for local manufacturing and distribution. But the potential for inter-modality also could provide Greenwash so that an almost-wholly road-based logistics operation could develop. This would be an unsustainable and tragic use of the internationally important peatlands. This is recognised in GMSF 11.195 to 11.200 with a series of strict tests such as delivery of new and improved transport infrastructure that are not (but should be) replicated in the draft Salford local plan. If the early phase of currently consented development fails the tests in the draft GMSF, then the Salford local plan

should ensure that development ceases until it is possible to meet the sustainability tests that led to the intention to remove it from the Green Belt in the first place.

## Green Belt

The Greater Manchester Spatial Framework removes three sites in Salford from the Green Belt and allocates them for housing, plus one for industry. GM32 and GM33 are high quality agricultural land.

- GM Allocation 30      Hazelhurst Farm (15.7 hectares)
- GM Allocation 31      Boothstown (29.0 hectares)
- GM Allocation 32      North of Irlam Station (65.1 hectares)
- GM Allocation 33      Port Salford Extension

While some land is being added to the Green Belt, these are mainly sites that could not be developed anyway, so the sites listed above are real, net losses. While it is not the role of, or within the power of the Salford local plan to change Green Belt boundaries, GMSF emphasises that just because a site has been taken out of the Green Belt, it does not follow that development will inevitably follow in the next Local Plan period. For each site, GMSF lists a number of constraints and conditions that must be met. Therefore, some of these sites may be developable but not deliverable

- **developable** = able to be developed at some stage even though there might be constraints that prevent the site being developed now.
- **deliverable** = able to be built. This generally means with planning consent, or otherwise available (such as on a brownfield register) and with no other serious constraints.

## Housing

We are pleased that the plan recognises and encourages the provision of higher-density housing in the city centre and adjacent areas where there already exists or is the potential for good public transport, walking and cycling routes, employment, leisure, retail and other infrastructure. In many ways Manchester/Salford City Centre has been showing the way ahead for the region in a new way of living that is attractive to both residents and businesses and avoids the urban sprawl characteristic of much modern development.

Official projections anticipate an increase of almost 18,500 households in Salford over the period 2018-2037, while the plan itself makes almost double this - provision for at least 32,680 net additional dwellings 2018 to 2037 (1,720 dwellings per annum, dpa). The local housing 'need' figure is 26,068. The additional 6,612 dwellings are being provided in Salford to meet demand from the rest of Greater Manchester to avoid development in the Green Belt in other GM districts. It is ironic that this will lead to development in the current Salford Green Belt on the internationally important mosses.

### Housing need and housing numbers

The housing requirement for Salford of 32,585 net additional dwellings 2018-2037, is set by the Revised Draft Greater Manchester Spatial Framework This is significantly higher than the ONS 2016-based population projection for Salford in 2037 - almost 287,000, an increase of 14% on the 2017 population. It is not obvious where the people in the GMSF higher population growth figures would come from. While this local plan cannot challenge the figure that is eventually decided through the GMSF process, there needs to be a contingency to decide which sites are developed first if the additional populations that will theoretically move to Salford as part of the accelerated growth scenario don't turn up. This would ensure the Mosslands were protected and urban site were effectively regenerated.

## Net housing

10.5 makes the valid point that *'some of the city's older employment areas will find it increasingly difficult to secure longer term investment and occupation. In order to make the best use of available land it may be appropriate for such areas to take a new direction, which could involve the introduction of non-employment uses including residential'*. This would mean that less open and greenfield land would need to be developed. However, the allocation of housing land does not take this into account. The use of the word *'will'* in 10.5 suggests this process is seen as inevitable. We agree with this and think part of the housing allocation should assume this happens. For instance, just 5 ha per year of employment land nearer the centre becoming available would mean that at 50 dpa, then 250 additional dwelling a year would be delivered – 4,750, or 15% of the inflated GMSF figure. This would mean that while the Irlam Mosslands site would still be taken out of the Green Belt, there would be no need to develop it before 2037 and it would not be allocated for housing in this local plan.

## Inclusion

We welcome this inclusion of 'A Fairer Salford' as the first of the policy chapters, which indicates the importance and indicates that it should be a guiding principle for other policies. We welcome:

- Policy F1 (An inclusive development process) that seeks to ensure early, proactive and effective engagement with the community over development proposals.
- Policy F3 Inclusive places, making it easy and attractive to walk, cycle and use public transport, with motor vehicles not being allowed to dominate
- Policy F4 Fairness between generations that aims to reduce carbon emissions enhance environmental capital, such as through a considerable net gain in biodiversity, address pollution issues, such as by improving air and water quality, and tackling land contamination;

There is no monitoring section for this chapter, so it is not clear what success looks like or what action will be taken if policies in this chapter prove less effective than planned. Without a target, other policies that encourage new and less sustainable development will dominate.

## Efficient use of land

We welcome Policy EF1 Efficient use of land including requirements that sites should be accessible public transport, cycling and walking. However, in the past similar policies have not been able to prevent car-dominated developments or suburban sprawl, and a stronger policy wording is needed.

We also welcome minimum residential densities (Policy H6). However, these can be met by developers providing small flats with few bedrooms. While minimum space standards exist, we also think there should be standards for minimum number of habitable rooms per hectare (comparable to the standards in the London Plan).

## Employment

Policy EC4 envisages 120,000m<sup>2</sup> employment land at Port Salford, 320,000m<sup>2</sup> at the Port Salford Extension, 125,000m<sup>2</sup> on other sites as EC5/1 Port Salford (Irlam and Winton) EC5/2 Salford Innovation Park (Irwell Riverside) and GM Allocation 33 Port Salford Extension. We welcome the statement in 10.17 that *'It will be important to ensure that it is a genuinely tri-modal facility with a significant proportion of freight being moved by water and rail rather than road,'*

The overall development figure does not discriminate between Industrial and warehousing development. Logistics development is wasteful of land, including good quality agricultural land as it:

- Brings a low density of poorly paid and low skilled jobs and Increases inequality.
- Entrench car dependency making residents dependent on congested roads for work, education, shopping and leisure trips.
- Increases climate change gas emissions and reduces air quality.
- Is ultimately unsustainable and incompatible with a high quality of life in Salford.

This means that employment land allocation should be split between logistics and other, higher value industrial uses such as advanced manufacturing. This will avoid logistics dominating employment land allocations and bringing the problems listed above.

## Transport

We welcome Policy A2 Transport hierarchy and Policy A3 Sustainable streets. These should lead to communities that have a better quality of life and are more sustainable.

We are less impressed by the claims (3.18) that *'The scale of growth will generate an increased demand for travel, and it will be essential that the potential for walking, cycling and using public transport is maximised'*, but then says *'that it is not possible to identify many of the precise transport schemes that will need to be delivered'*.

We think it is essential that development proposals demonstrate how they will meet the aspirations and requirements of GMSF that development is accommodated with no additional car journeys. We anticipate that this will be relatively straightforward for sites in the regional centre, but may be impossible for allocations such as GM30, 31 and 32 and they could be undeliverable in the current plan period. If this is the case, they can be safeguarded but not developed in the current plan period.

## Retail

We object to Policy CT3 (Land around AJ Bell Stadium, Irlam) which seeks to authorise a wide range of uses including out-of-town retail on the wasteland around the AJ Bell Stadium. The stadium and surrounding area have little public transport and poor walking and cycling links with little prospect of improvements. The area is almost wholly dependent on access from the Motorway network which is particularly congested near the Trafford Centre. While the policy seeks to retain a line for a potential extension of the Trafford Park Metrolink line, this scheme has no powers or funding and is unlikely to be delivered in the plan period. More out-of-town retail in this area will add to urban sprawl, undermine town centres and add to the problems of retail decline in existing centres, congestion, pollution, climate change gas emissions and car dependency. It would therefore directly conflict with many of the other plan policies. It may be the case that some of this land already benefits from planning permission for bulky goods retailing, but this is not a reason for reinforcing an unsustainable development pattern.

We would accept that uses directly related to the stadium or leisure facilities that could not be provided elsewhere (subject to a sequential test) could be permitted.

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