23 December 2016

To whom it may concern

Greater Manchester Spatial Framework
Consultation on the draft plan 2016/2017

I am writing to respond to the consultation on the Draft Greater Manchester Spatial Framework. As the Member of Parliament for Worsley and Eccles South my comments relate primarily, but not solely, to the constituency I represent.

I have outlined below the points that I would like to ensure are considered at this stage of the consultation process.

The aims of the Greater Manchester Spatial Framework

I agree that we do need a strategy which outlines how and where jobs and homes will be created over the next 20 years. However, planned growth needs to be proportionate and development should not be detrimental to the quality of life of people living in Greater Manchester.

It makes sense to plan for growth in a balanced and sensible way. The strategy should not be limited to housing and employment growth but should also be a plan for the protection of our green spaces and for improvement of the health and wellbeing of our residents.

Crucially, this Framework must represent the way Greater Manchester residents want their communities to grow. The aims of the Framework should not run counter to the wishes of local people.

I share the view of the Campaign to Protect Rural England (CPRE) which said in September 2015:

“The Northern Powerhouse and devolution must be based on the right reasons, with strategic land use and infrastructure investment decisions being founded on a long-term vision, not on narrow short term economic interests.”1

It is therefore of concern to me that a number of proposals in the GMSF actually do run counter to the wishes of communities in my constituency.

I welcome proposals in the GMSF which seek to tackle the fundamental challenges we face in terms of air pollution, managing flood risk and switching to a sustainable and low-carbon future. I hope that we can make real progress on these issues. I believe that it is important that this Framework works together with other key Greater Manchester wide strategies like the recently published Low Emissions Strategy for Greater Manchester. However I am concerned that at the present time joined-up working between strategies is not happening.

I welcome proposals that will help to boost the local economy in Worsley and Eccles South and help my constituents to access good quality jobs and have a good standard of living. Alongside economic benefits we must ensure that residents maintain access to quality green open spaces and have improved local transport provision. I believe that it is in these two objectives that the current draft GMSF fails.

Having met a number of my constituents and listened to their views on the draft proposals, I know that there is a great deal of anger over plans in the GMSF to develop local Green Belt land.

Like many of my constituents, I have real concerns about proposals in the Framework which earmark substantial areas of Green Belt land for largescale development. This represents a short-sighted approach, which threatens the future of these much-loved areas of land.

Clearly if developers are given the choice between developing a green open space or regenerating previously developed brownfield land, the choice they will make is obvious.

In the GMSF we need an intelligent plan which looks at how we can focus development on our brownfield sites – encouraging the redevelopment and regeneration of these areas of land. Such a plan could bring back to life empty and in some cases neglected former factory sites. The development of these sites should be the priority for Greater Manchester.

The strategic aims of the Greater Manchester Spatial Framework should work to support both the current and future needs of local residents. Proposals should be balanced, considering the needs of current and future generations of residents of our towns and cities. Plans should not drive forward development at the expense of a good quality of life for current residents.

**Concerns about housing projections in the Greater Manchester Spatial Framework**

Concerns have been raised by the Campaign to Protect Rural England (CPRE) about the housing and jobs figures that are used as the basis for this Framework. I share these concerns.

The CPRE has said that they believe that the projections for housing and jobs rely on “untenable economic growth assumptions, which are greatly in excess of baseline forecasts…” and that:

“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.”3

The GMSF states that in Greater Manchester we will need 227,200 dwellings, equating to 11,360 dwellings per annum over the plan period up to 2035. In comparison, the previous North West Regional Spatial Strategy planned for 173,200 dwellings between 2003 and 2021, equal to 9,623 per year.

In the draft GMSF the city of Salford has the second highest percentage of housing requirement in Greater Manchester (15%)4, so this is a significant point. Concerns have been raised that the projections of need are too high. If the figures have been over-estimated this means that our Green Belt and green open spaces are needlessly under threat from development.

While plans for the Northern Powerhouse and Devolution represent exciting challenges ahead for Salford and the other areas across Greater Manchester, it is essential that we do not over-estimate growth and threaten the future of our green spaces and the benefits that are intrinsically linked to them.

**Site-specific concerns**

I have serious concerns about the impact these proposals would have on the land, on the health of local residents, on infrastructure and on the environment. Many of my constituents share my concerns and have been very vocal in their opposition. Several local groups have come together to oppose the plans.

**Western Cadishead and Irlam - allocation reference: WG2 – proposals for around 2,250 homes by 2035.**

The GMSF states that land extending to the west of Irlam would be developed to provide a “high quality extension to the Irlam neighbourhood”.

Worryingly the site sits on mossland and the strategy document admits to the loss of peat by stating:

“Most of the site has significant depths of peat across it, which has been degraded due to decades of drainage and agricultural activity. Neither the less it still performs an important carbon storage function, and should be retained wherever possible…”5

I understand that the Green Belt land in Irlam and Cadishead is Grade 1 Agricultural land. The best and most versatile land is defined as Grades 1, 2 and 3a and is the land which is most flexible, productive and efficient in response to inputs and which can best deliver food and non-food crops for future generations.6 This means it is excellent quality land which has either

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3 http://www.cprelancashire.org.uk/news-private/current-events/item/2388-open-meeting-greater-manchester-spatial-framework
4 http://gmsf-consult.objective.co.uk/portal/2016consultation/gmsfoct16?pointId=s1476450796171#section-s1476450796171 Section 8.1 of GMSF document.
5 http://gmsf-consult.objective.co.uk/portal/2016consultation/gmsfoct16?pointId=s1476450796199 Section 28.2.2
6 HM Government, online national Planning Practice Guidance, Paragraph: 026 Reference ID: 8-026-20140306, How can planning take account of the quality of agricultural land? Revision date: 06 03 2014
no or very minor limitations for agricultural use. A range of agricultural and horticultural crops can be grown on this land and yields are high and less variable than on land of lower quality.

In order to bring forward the new ‘high quality extension’ grade 1 agricultural land will be developed and some peat may be lost.

It seems shortsighted to develop such high quality Agricultural land. Given the trend for locally-sourced food and fuel, I believe that we should be focusing our efforts on making the best use of the land in a sustainable way.

The mossland is a tract of countryside of great value to those living in surrounding urban communities. In addition to its agricultural importance, it has great potential for informal recreation for those living in Salford. This land is also important for nature conservation and particularly for birdlife.

The loss of this land would set a worrying precedent. Although the Framework states that remaining areas of mossland would be protected and preserved, local people are sceptical. Our mosslands should be managed and restored to ensure that their carbon sequestration potential is realised. We should not be allowing pockets of this land to be lost for development.

The NPPF directs local planning authorities to seek to use poorer quality over higher quality agricultural land:

“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.”

Many of the same issues apply for the proposals for the Port Salford expansion - allocation reference: WG3 – proposals for 320,000 m² of employment floorspace.

According to the Framework, in order to facilitate the industrial expansion, we would lose Green Belt and mossland.

The GMSF makes clear that, even with the Green Belt around the site being retained, the expansion is “likely to have a significant visual impact” on the surrounding area. The Framework stresses the need for “high levels of public engagement” as the plans progress.

On traffic it states that:

“The site will generate significant additional traffic, and it will be necessary to provide a new motorway junction and link road for this to be accommodated…”

But suggestions to tackle the traffic will only offset “to some degree the traffic associated with the development.” The Framework also admits that there is likely to be an impact on the landscape:

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8 http://gmsf-consult.objective.co.uk/portal/2016consultation/gmsfoct16?pointId=s1476450796200 Section 28.2.3
“Even with the retention of the Green Belt, the scale of the development is likely to have a significant visual impact, and it will be very important for it to be integrated into the landscape as far as possible…”

Port Salford’s expansion would increase the existing industrial areas down Barton Moss to the east of the M62 and onto the mossland.

The Framework states that the development at this site would not go ahead until the infrastructure was put in place to support it. Local residents are sceptical about these assurances.

**East Boothstown - allocation reference: OA18 – for around 300 homes – targeting top end of the housing market.**

I understand that this site refers to the land located next to the RHS Garden Bridgewater site. The new garden is expected to attract a million visitors a year. The GMSF is calling for the neighbouring site, on the Green Belt, to be earmarked for 300 upmarket homes.

It is suggested that this area of Green Belt could be lost in order to “attract and retain highly skilled professionals”. I am concerned that we would lose green space to make way for ‘upmarket homes’ and also that even more traffic could be adding to the congestion in an area already identified as a traffic hotspot.

**Astley and Boothstown (Salford and Wigan) – allocation reference: ELR5 – for around 1,000 homes.**

I believe that the draft proposals for this Green Belt land could mean that green space at this site would be lost to make way for a substantial housing development on the East Lancashire corridor. This is a stretch of road which is renowned for congestion, particularly over the last two years or so. It does not seem sensible to be pressing ahead with developments of this scale in areas which are struggling to cope with current traffic volumes.

**Hazelhurst Farm - allocation reference: OA19 - proposals for around 450 homes.**

Again, developing on this scale and at this location is a cause for concern in an area which is already frequently congested.

I wish to make it clear that I object in the strongest terms to the inclusion of the proposals outlined above which are located in the Green Belt in Worsley and Eccles South. I ask that the proposals outlined above be removed from the GMSF and that work be carried out to secure the future of these green spaces, free from the threat of development.

I receive many comments from constituents who are deeply worried about the loss of the land at the sites listed above and I share their concerns. I have listened to and discussed those concerns at some length with local residents.

**Concerns about the loss of Green Belt land**

I am deeply concerned about the proposals to alter the designation of significant areas of Green Belt land across Greater Manchester.

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9 [http://gmsf-consult.objective.co.uk/portal/2016consultation/gmsfoct16?pointId=s1476450796200 Section 28.2.3](http://gmsf-consult.objective.co.uk/portal/2016consultation/gmsfoct16?pointId=s1476450796200)
According to the draft GMSF, I understand that we could lose 4,900 hectares of Green Belt in Greater Manchester, a net loss of over 8%.

The five purposes of Green Belt are clear:

- to check the unrestricted sprawl of large built-up areas;
- to prevent neighbouring towns merging into one another;
- to assist in safeguarding the countryside from encroachment;
- to preserve the setting and special character of historic towns; and
- to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

There are substantial health benefits in accessing this land for recreation and leisure purposes and ultimately this land can improve quality of life for local residents. Green space is an important environmental asset for local communities, particularly in otherwise urban areas.

I am opposed to the removal of land from the Green Belt for development. The loss of this land could lead to urban sprawl and countryside encroachment and it could result in areas of vacant brownfield being overlooked for development.

Once this land is released from the Green Belt I am concerned that it will set a worrying precedent for the future of other areas of our protected green space. In effect this decision could open the floodgates for further changes to our Green Belt policy. In its draft response to the current consultation, the CPRE makes that point that:

“This significant loss of Green Belt is against stated policy in the National Planning Policy Framework and Ministerial Letters 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.”

In response to concerns that I and other MPs raised about the protection of Green Belt land earlier this year, the former Planning Minister Brandon Lewis said that:

“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…we have been repeatedly clear that demand for housing alone will not change Green Belt boundaries.”

Over the last 11 years as the local MP, I have repeatedly expressed concerns about the suggested release of Green Belt land and have opposed the inappropriate development of greenfield land. I have presented a petition to Parliament signed by residents in Irlam and Cadishead calling for assurances that their local green spaces will be protected.

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10 [http://gmsf-consult.objective.co.uk/portal/2016consultation/gmsfoct16?pointId=s1476450796179#section-s1476450796179](http://gmsf-consult.objective.co.uk/portal/2016consultation/gmsfoct16?pointId=s1476450796179#section-s1476450796179) Section 16.0.1
13 Letter from Brandon Lewis MP, Minister of State for Planning and Housing, 7 June 2016
I made my views clear in response to consultations on Salford’s Core Strategy document. I have spoken out against damaging planning applications that have threatened green open land at planning meetings and at planning inquiries. And I made these views clear in my response to the previous consultation on the GMSF last January.

A number of my colleagues in Westminster share my concerns about the GMSF. During a recent debate in Parliament on the GMSF twelve Greater Manchester MPs, from different political parties, out of the fourteen present raised concerns about the GMSF. The concerns which we raised included objections to the development of Green Belt land.

National planning policy on the Green Belt is very clear. This land should only be developed in the most exceptional of circumstances. It should be protected from development wherever possible. The case simply has not been made for this to happen. The exceptional circumstances do not exist.

It is unfair to develop these areas of land, which are highly valued by the local community, in an otherwise urban environment in Salford, in order to meet ambitious targets set for the whole of Greater Manchester.

In October 2014 the Conservative-led Government updated online Planning Practice Guidance. The aim of this was to reaffirm local authorities’ abilities to

“safeguard their local area against urban sprawl, and protect the green lungs around towns and cities”.14

On whether housing and economic need overrides constraints on land use like Green Belt the Guidance states that:

“The National Planning Policy Framework should be read as a whole: need alone is not the only factor to be considered when drawing up a Local Plan.

The Framework is clear that local planning authorities should, through their Local Plans, meet objectively assessed needs unless any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole, or specific policies in the Framework indicate development should be restricted. Such policies include those relating to sites protected under the Birds and Habitats Directives, and/or designated as sites of special scientific interest; land designated as green belt, local green space, an area of outstanding natural beauty, heritage coast or within a national park or the Broads; designated heritage assets; and locations at risk of flooding or coastal erosion.”15

The Conservative-led Government said that it wanted planning policy to make clear that unmet housing need does not justify the harm done to the Green Belt by inappropriate development.

While I welcome plans to introduce more affordable housing to ensure local people are able to get on to the housing ladder, the need for affordable homes is not considered justification for removing these areas of land from the Green Belt. The NPPF makes it clear that the construction of new buildings should be regarded as “inappropriate” for the Green Belt. While there are some exceptions, the development of affordable housing is not permitted as one of the exceptional circumstances.

The Government’s 2014 web-based Planning Practice Guidance sets out that unmet housing need in a particular area is unlikely to meet the “very special circumstances” test to justify Green Belt development:

“Unmet housing need (including for traveller sites) is unlikely to outweigh the harm to the Green Belt and other harm to constitute the “very special circumstances” justifying inappropriate development on a site within the Green Belt”.

Local green spaces serve as a green lung for otherwise urban areas of Salford. People from Worsley and Eccles South have been active in campaigning to protect the green open spaces which have been proposed for development.

I support the principle of focusing development, wherever possible, on brownfield land. Rather than lose our green spaces forever, we should be focusing on regenerating our towns and cities and encouraging people to move to these areas.

The Campaign to Protect Rural England stated in September 2015:

“There is still progress to be made to optimise the value of the significant amount of vacant and neglected previously built land (brownfield) across Greater Manchester. The latest National Land Used Database shows that Greater Manchester has 2,721 hectares, the highest amount of brownfield land in the North West, which does blight areas when left in a neglected and vacant condition.”

“CPRE believes the GMSF must focus attention on bringing back into use this wasted land resource. Land assessed as suitable for housing in Greater Manchester is 1,309 hectares and at an average build out rate of 40 houses per hectare this equates to 52,360 houses. It would be perverse if brownfield land, which is generally located in more central and therefore accessible locations is not successfully reused in advance of allocating further greenfield land.”

Given the availability of brownfield land across Greater Manchester, I question the need to remove land from the Green Belt. I share concerns that have been raised by CPRE in their draft response to the GMSF. They make it clear that while the draft GMSF suggests a brownfield target of only 70% in the not so distant past, local authorities across Greater Manchester were expected by the Regional Spatial Strategy to achieve between 80% and 90%.

The development of brownfield sites first is a more sensible approach to house building. These areas tend to be closer to urban centres and near to existing infrastructure. Intelligent planning on the future of these sites could encourage local regeneration.

I believe that a brownfield first approach is essential.

The decisions that are taken on the future of our Green Belt will impact not only current residents but future generations of Greater Manchester residents.

Government policy on protection for the Green Belt is outlined in S9 of the National Planning Policy Framework, clearly states:

16 Planning Practice Guidance, Housing and economic land availability assessment, Methodology – Stage 5: Final evidence base, 6 March 2014
"The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence."

It also makes clear that the construction of new buildings should be regarded as inappropriate for the Green Belt. The development of Green Belt and other green open spaces in Salford would mean less open space in an already built up city and ultimately the people who live, work, travel or take leisure in these areas will be adversely impacted.

The benefits of this land are well documented – recreational, environmental, agricultural and health and wellbeing.

According to the report *Turning the Tide on Inactivity*, out of nine regions the North West has the second highest percentage of adults who are physically inactive. According to the same report, Salford is 148th most inactive (out of 150 local authorities) with 39% of adults being classed as inactive. This inactivity is estimated to cause 382 premature deaths (per 100,000 population each year) and cost £25.6m (overall cost of inactivity per 100,000 people to local authorities annually). Is it sensible then to reduce the amount of green space in our local area?

Green spaces also provide a longer term positive effect on life satisfaction and are good for people’s well-being. A study published in 2013 found that living in an urban area with green spaces has a long-lasting positive impact on people’s mental well-being. Researchers found that moving to a green space had a sustained positive effect:

“…on average, individuals have both lower mental distress and higher well-being when living in urban areas with more green space. Although effects at the individual level were small, the potential cumulative benefit at the community level highlights the importance of policies to protect and promote urban green spaces for well-being”.

According to research from the University of Washington:

“Encounters with nearby nature help alleviate mental fatigue by relaxing and restoring the mind. Within built environments parks and green spaces are settings for cognitive respite, as they encourage social interaction and de-stressing through exercise or conversation, and provide calming settings. Having quality landscaping and vegetation in and around the places where people work and study is a good investment. Both visual access and being within green space helps to restore the mind’s ability to focus. This can improve job and school performance, and help alleviate mental stress and illness.”

The research highlights the following:

- The experience of nature helps to restore the mind from the mental fatigue of work or studies, contributing to improved work performance and satisfaction.

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19 Turning the tide of inactivity, [link](http://ukactive.com/downloads/managed/Turning_the_tide_of_inactivity.pdf)
20 Turning the tide of inactivity, [link](http://ukactive.com/downloads/managed/Turning_the_tide_of_inactivity.pdf)
21 Turning the tide of inactivity, [link](http://ukactive.com/downloads/managed/Turning_the_tide_of_inactivity.pdf)
23 [link](https://depts.washington.edu/hhwb/Thm_Mental.html) Green Cities: Good Health
Green spaces provide necessary places and opportunities for physical activity. Exercise improves cognitive function, learning, and memory.

Outdoor activities can help alleviate symptoms of Alzheimers, dementia, stress, and depression, and improve cognitive function in those recently diagnosed with breast cancer.

Contact with nature helps children to develop cognitive, emotional, and behavioral connections to their nearby social and biophysical environments. Nature experiences are important for encouraging imagination and creativity, cognitive and intellectual development, and social relationships.

Symptoms of ADD in children can be reduced through activity in green settings, thus “green time” can act as an effective supplement to traditional medicinal and behavioral treatments.

Green spaces offer many benefits to people who live near them and visit them, to the places they are set in and to the nature that they host. They offer many benefits to local communities, to the local economy and for nature. These areas of land are important assets and I would urge the Combined Authority to think again on the proposals that could see us lose areas of Green Belt land in Worsley and Eccles South.

**Concerns relating to traffic and transport**

In and around Worsley and Eccles South local roads, infrastructure and transport capacity struggle even at existing demand levels. The loss of green space and the large scale development proposals for the constituency will exacerbate these congestion problems. There are few solutions which have been put forward to try to tackle the current congestion and they have not been effective.

The local road and motorway network is already at the point of gridlock at peak times and due to sports or other events affecting the network. The introduction of a “Smart Motorway” scheme on the M60 along the Worsley and Eccles stretches of the road will not resolve the acute problems we now have with traffic congestion. Indeed, work to change the M60 to a Smart Motorway has been on-going for some time, causing significant disruption even before the scheme is up and running.

Last year I started a campaign to try to get senior transport officials to tackle the problems that local people face on our roads now, and to suggest solutions for the future. No short or even medium term solutions were forthcoming.

During a traffic summit with the former City Mayor and senior transport officials last year, I was told that between November 2014 and November 2015 traffic on roads in Salford had increased by 3.6%. This is more than three times the 1.1% average increase in traffic across Greater Manchester. With roads and motorways in Salford full to capacity at peak times, accidents or an event at a stadium or the Trafford Centre can now cause gridlock.

I question how sensible it is to be putting forward proposals for significant developments in this area without tackling these congestion problems first.

As it stands, we have a strategy with development plans which will potentially change areas but with no substantial or tried and tested measures to combat the severe congestion issues we face on our roads.

Plans to encourage people to commute via public transport are welcome, but for this to work the confidence of commuters must be won first. For now, many people do not have that confidence and would rather travel by car.
“Rail routes from Bolton, Liverpool and Leeds are currently some of the most crowded in the UK, outside London, Manchester has the worst crowding and second largest rail patronage in England and Wales. Whilst considerable investment has been made in public transport on rail, Metrolink and bus in the Greater Manchester area, it is challenging for these generally radial services to provide an attractive alternative for many of the orbital, longer distance and disparate movements being made on the motorway network.”

The M60 is a critical part of the North West transport network in England. However the mix of local traffic and strategic traffic, together with the design of the road, exacerbates congestion and environmental problems.

According to the Manchester North West Quadrant Study – Stage 3 Report by the Department for Transport, Highways England and Transport for the North:

“…the merging and diverging of traffic from the M62, M602, M61 and M66, which feeds into the M60 in the Manchester North-West Quadrant, leads to considerable congestion at intersections. This congestion leads to:

• journey time unreliability – 15 of the worst performing 100 motorway sections for the percentage of journeys completed on time are within the study area;
• high journey times – with journey times on some sections of the motorway network within the study area taking up to 4.5 times longer compared to a mile a minute network;
• low speeds – with speeds dropping below 15mph in the peak periods and below 30mph off peak; 
• poor safety record – the strategic road network within the study area is almost entirely within the top 20% of the worst performing in terms of total casualties per billion vehicle miles .
• poorer air quality – At speeds below 25mph, emissions start to increase rapidly as speed continues to decrease.

There is a real fear in Worsley and Eccles South is that further development will exacerbate current levels of traffic congestion. The Manchester North West Quadrant Study echoes existing concerns by stating that:

“future development proposals in and around the study area will create additional residential, employment and distribution trips and will further impact the transportation network thus compounding existing problems…”

And that:

“The existing poor performance of the motorway network in the Manchester North-West Quadrant means that the majority of the sections of M60 between junctions 8 and 18 fall within the worst 10% of national motorway links in terms of journey time reliability. Furthermore, when incidents occur there are few viable alternative routes for traffic to use as the alternative routes already experience high levels of...”

congestion and consequently the network takes a long time to recover from issues resulting in prolonged congestion, lost productivity and environmental dis-benefits.”

The study also states that:

“Even taking account of planned improvements both to the road network and to public transport, the anticipated impact of the forecast traffic growth over the next 20 years is that the motorway network within the study area will experience further worsening of the identified problems which will limit economic growth potential of future developments.”

The M60 in Salford is already operating at capacity and experiences significant operational issues and:

“…Committed and planned developments will exacerbate this and could constraint further development aspirations and opportunities as well as impacting potential inward investment to the area.”

“Transport and transport related problems in Manchester’s North-West Quadrant already present barriers to economic growth and will only worsen over the coming years. The case for change is therefore based on the interrelated transportation and economic needs of the north. Importantly, if the capacity constraints on the motorway network in the Greater Manchester area (and their impact on the wider transport network in the north) are not addressed, they will; hold back growth across the region; make the aspirations for the Northern Powerhouse harder to achieve; and, see worsening transport and environmental issues.”

Our local road network is often gridlocked, the air quality is very poor and there is low confidence in much of our local public transport.

It is unclear to me as to what funding, if any, will be made available to update existing transport infrastructure or to create the new transport infrastructure needed to meet the aims of the GMSF. In order to encourage residents to travel by public transport their trust must be regained. That will simply not be achievable if passengers are still forced to use services that are stretched to capacity and that are unreliable.

**Poor Air quality**

Further development, particularly through the development of our green spaces, in Worsley and Eccles South could also have an impact on the health of local residents due to increased air pollution from the additional car movements.

The recently published Greater Manchester Low Emissions Strategy states that:

“Poor air quality has a real and significant effect on people’s lives, contributing to cancer, asthma, stroke and heart disease, diabetes, obesity, and changes linked to

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dementia. Long-term exposure to outdoor air pollution is understood to be a contributory factor in deaths from respiratory and cardiovascular disease.\textsuperscript{31}

This is such a problem that the mortality effect of air pollution is now included as an indicator in the national Public Health Outcomes Framework. Along with the human cost of the emissions, the Low Emissions Strategy also highlights the wider problems:

\textquotesingle\textquotesingle…there is an indirect impact on the economy as a whole: health problems affect the ability to work and contribute to low productivity. The National Air Quality Strategy (DEFRA 2007) stated that poor air quality costs society between £8.5 billion and £20.2 billion a year. This impact is seen as comparable to those relating to physical inactivity at £10.7 billion and alcohol misuse at £12-£18 billion (Commons Select Committee 2010). Air pollution also has wide-ranging environmental impacts, including loss of biodiversity and reduced crop yields.\textsuperscript{32}

The impact of poor air quality is significant and clearly a focus on addressing these concerns is critical. I am concerned therefore about the lack of realistic and joined up action to tackle the problems.

While I support actions to reduce air pollution through measures such as more environmentally friendly public transport measures, this action alone will not solve the problem.

The Low Emissions Strategy makes clear that in tackling the challenges posed by transport emissions that “…the level of investment that will be available is uncertain and there will be a need to be a sound business case for schemes before they can go forward.”\textsuperscript{33}

In that case, how can we earmark swathes of Green Belt land for development, adding more cars to local roads, without having tackled the problems we face now? The lack of coordinated thinking in the framework is troubling.

There is much evidence to suggest that air pollution causes significant harm to the environment and to the health of our communities. Transport is the biggest source of NO\textsubscript{2} and PM\textsubscript{10} and is a major contributor to carbon emissions. Motorways are a major contributor to emission and as is highlighted in the consultation the whole of the motorway network in Greater Manchester falls within the Air Quality Management Area.

The National Planning Policy Framework states that:

\textquotesingle\textquotesingleTo prevent unacceptable risks from pollution and land instability, planning policies and decisions should ensure that new development is appropriate for its location. The effects (including cumulative effects) of pollution on health, the natural environment or general amenity, and the potential sensitivity of the area or proposed development to adverse effects from pollution, should be taken into account…\textsuperscript{34}

We already have significant problems with air pollution and poor air quality in Worsley and Eccles South constituency, due to the volumes of traffic and traffic congestion on the three motorways, (the M60, the M62, and the M602) and the local road network.
In 2013 the Supreme Court confirmed that:

“…the Government is in breach of the EU Air Quality Directive leaving the UK open to enforcement action at the national or European level. …Nitrogen dioxide is exceeded in Greater Manchester at roadside locations and in busy town centres. Defra forecast that compliance with nitrogen dioxide limits will not be achieved until 2020 in Greater Manchester…Pollution from road traffic is the most significant cause of poor air quality in Greater Manchester.”

Poor air quality can have serious consequences for both human health and the environment. More people die prematurely every year because of air pollution than in road traffic accidents. Poor air quality and climate change are linked as both result from the combustion of fuel.

The main pollutants of concern in Salford are nitrogen dioxide (NO2) and particulate matter (PM10). The main source of pollution in the city is transport. Nitrogen emissions affect lung function and increase the risk of respiratory problems. They may exacerbate asthmas and increase susceptibility to infections.

In 2012 at the Salford M60 monitoring Station at junction 13, the permitted level of Nitrogen Dioxide was exceeded on 260 days, an increase from 248 in 2011 and 2010. This was the second highest rate of Nitrogen Dioxide levels recorded in Greater Manchester in 2012 (behind only the Manchester Oxford Road station which recorded 296 days as exceeding the limit).

According to the Greater Manchester Emissions Inventory 2010 Update Report from June 2013, motorway emissions for Salford are the worst in Greater Manchester and often double that of neighbouring districts. For example there are 813 tonnes per year of Carbon Monoxide in Salford compared to 482 tonnes in Manchester and 320 tonnes in Trafford. In terms of Particulate Matter, Salford levels are at 106 tonnes per year compared to 59 tonnes in Manchester and 39 tonnes in Trafford.

The mortality figure for Salford attributable to air pollution is 5.9%, which is higher than the average for England of 5.6% and much higher than the figures for some parts of the country.

Reported respiratory problems in Salford, such as COPD and asthma are significantly worse than the average in England. Reported prevalence of COPD for Salford Clinical Commissioning Group was 2.8% - significantly worse than the England average (1.7%) and higher than the average for the North of England Commissioning region (59 out of 68 Clinical Commissioning Groups in the region). This prevalence of respiratory disease has risen from 2% in 2005.

In 2013 the Highways Agency announced it had shelved plans for all-lane running on the M60 between junctions 8 and 18 due to poor air quality:

“We looked extensively at the option to provide all-lane running on the M60 section between junctions 8 and 18. However, our environmental assessment concluded that creating this improvement would result in an increase in traffic using the motorway which would then have a detrimental affect [sic] on air quality. Poor air quality is a concern for the UK and across much of Europe, despite air being cleaner now than at any time since the industrial revolution.

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“There are UK and European standards designed to protect human health and sensitive ecological habitats which we cannot ignore; as a result we are unable to take this proposal of making the hard shoulder available to traffic on this section at this time. We are committed to delivering solutions to minimise the air quality impacts resulting from traffic using our network and are working to develop further solutions that will help improve this section of our network that comply with statutory air quality limits.”

Given the existing levels of poor air quality in Greater Manchester, action is needed. I welcome plans to address these problems. However, I have concerns about how this can be achieved given the proposals in the draft GMSF to develop large areas of Green Belt land in Worsley and Eccles South and across Greater Manchester. These proposals seem to run counter to one another.

“Air pollution is the single largest environmental health risk in Europe; recent estimates suggest that the disease burden resulting from air pollution is substantial (Lim et al., 2012; WHO, 2014a). Heart disease and stroke are the most common reasons for premature death attributable to air pollution and are responsible for 80% of cases of premature death; lung diseases and lung cancer follow (WHO, 2014a). In addition to causing premature death, air pollution increases the incidence of a wide range of diseases (e.g. respiratory and cardiovascular diseases and cancer), with both long- and short-term health effects. The International Agency for Research on Cancer has classified air pollution in general, as well as particulate matter (PM) as a separate component of air pollution mixtures, as carcinogenic (IARC, 2013).”

Given the severity of the problems we currently face with air pollution exceedances and the potential impact this could have on the health of local residents, it does not seem sensible to bring forward proposals to add to the volume of traffic congestion and to threaten the future of our green spaces.

These are serious considerations that need to be factored in at both a strategic and local level when considering any future developments. Traffic congestion and the associated health concerns should be addressed as a priority.

**Strain on local services**

I have serious concerns about the lack of consideration that is being given to the impact that proposed new housing developments could have on local services, including on demand for school places and on GP practices in Worsley and Eccles South.

General demand on our local medical practices is already high. I have raised concerns on a number of occasions about increasing demands caused by the number of extra people moving into the catchment area of local GP practices.

I have had issues raised with me by local GPs about increases to their list sizes, with one practice seeing an increase of 15% in one year. GPs tell me there are no extra resources available to manage the demand. Most recently, one local GP practice has applied to have its practice list closed to new patients.

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New housing developments across my constituency are placing additional pressure on both our local GP services and our schools. Over the last few years I have raised objections to planning applications which I consider inappropriate for the area. In my objections I have routinely highlighted concerns about the impact additional housing could have on local services. This includes the impact they could have on the services provided by GP surgeries to patients.

GPs have told me that they are not consulted about the impact of a planning application on their practices. It appears that the impact of housing developments and the associated local population growth on local GP services is not being given proper consideration in the planning process. I am concerned that this is an issue which is being ignored and as a result our GP services are starting to reach breaking point in parts of Worsley and Eccles South. This situation is not sustainable.

I believe that, as it stands, the GMSF fails to take into account the impact that sizeable developments could have on local health services and other local services. It appears that little or no analysis has been made of the impact of these developments on local health services and infrastructure.

**In Summary**

As it stands the Greater Manchester Spatial Framework lacks a real vision for the communities it proposes to change.

I believe that giving the go ahead for large areas of local Green Belt land to be developed is wrong. It is a short-sighted approach which ignores the wishes of local people.

In its current form, the proposals in the draft GMSF would add great strain to our already overstretched local infrastructure and run counter to aims to tackle serious environmental concerns, including tackling poor air quality.

The vision of this strategy should be clear – a focus on regenerating our brownfield sites and bringing these back to life.

We need a focus on making real improvements to local public transport. We also need a concerted effort to tackle the intolerable levels of traffic congestion, with plans to achieve improvements which start now.

The strategic aims of the Greater Manchester Spatial Framework should be to support both the current and future needs of local residents. As it stands I do not feel that the draft GMSF does this. As was stated in last year’s consultation document on the GMSF, the Spatial Framework should be a “…plan for long-term success not just short-term development.” It would be unwise to rush developments in order to meet future targets at the expense of the quality of life of existing residents.

I object to plans to develop on the Green Belt and on our green open spaces and I call for a rethink on the amount of housing development that is being earmarked for Worsley and Eccles South.

I hope that the GMCA will listen to the concerns raised by me, by other Greater Manchester MPs and by local residents. I hope that we will see a revised plan which meets the aspirations of local people and which safeguards our precious natural resources for the benefit of future generations.

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41 Greater Manchester Spatial Framework Options consultation document, paragraph 3.3.
Please consider these comments as part of the consultation process. I look forward to being involved further with this consultation as this process develops.

Yours sincerely

Barbara Keeley MP
Member of Parliament for Worsley and Eccles South