

## Appendix 3 – Local Plan Issues Consultation Comments (February – May 2020)

### Overall Analysis

The consultation response yielded a total of 562 responses comprising 498 replies by email, and online comments submitted via the Objective consultation website from 64 people/organisations. The submissions fall broadly into those from individuals, from landowners and developers, from campaigning organisations, from statutory consultees, and from MCC partner organisations.

In summary, 500 responses (89% of the total response) were from individuals with 247 of those responses (44% of the total response) focusing on a campaign to protect Ryebank Fields in Chorlton. Four per cent of the response came from landowners and developers; with a similar proportion of the replies from campaigning organisations (3%) and statutory consultees (4%).

### Comments from Individuals

The comments from individuals (mostly local residents) cover a wide range of topics. Many people have commented on just one topic while others have commented on a whole range of subjects. Some of the submissions are very short while others have submitted lengthy documents.

The comments are from people across the city and beyond. Within this, there are clusters of comments from some particular local areas. The greatest number of comments are about Ryebank Fields. These are mainly from nearby residents in Chorlton, plus some living over the border in Trafford (Stretford), and elsewhere. There are also particular clusters of comments from people in the city centre, and from the Fallowfield-Rusholme area. The remaining comments are mostly spread out across the remaining various parts of Manchester, with some from neighbouring Greater Manchester (GM) districts, and a small number from further afield. Comments have also been received directly from some Manchester councillors.

The main topics raised by individuals include:

- **Affordable/social housing**; there is a wish to see more affordable/social housing of various types, including in the city centre.
- **Biodiversity**; protection and enhancement of flora and fauna
- **Built heritage** - heritage should be better protected, sighting in particular pressures on city centre buildings from new development
- **City centre**; mostly arguing for lower density development, or against overdevelopment
- **Climate change**; many submissions emphasise the importance of tackling the climate emergency. Of these, most are encouraging the Council to do more. There is some scepticism of the growth agenda in general, and growth at the airport in particular.

- **Cycling and walking**; there is support for more and better cycling and walking infrastructure, particularly in the light of the Covid-19 pandemic and the move away from public transport.
- **Delivery of the plan**: The Local Plan should be implemented in practice; some concern/scepticism about whether it will actually happen.
- **Green belt**: opposition to building in the green belt, particularly around the airport
- **Green spaces**: support for protection of existing green spaces; calls for more of them in the city centre - a perception that these have been a low priority and that this should change; Covid has shown the need for space for exercise, time with nature, and mental & physical health.
- **HS2**: generally opposition to development associated with HS2, and scepticism of the need for it. However, others supported it, or made points about maximising growth opportunities that may arise
- **Manchester Airport**: mostly opposing further growth due to the impact on the local environment, climate change, and also traffic congestion particularly on the motorway network. There is opposition to both the airport itself and nearby associated development including warehousing.
- **Nutsford Vale**: designate as a country park and retain it as a semi-wild space
- **Piccadilly Gardens**: negative perceptions of its physical appearance, and crime/anti-social behaviour in the area
- **Public Space**: there is support for more public spaces, and especially for more green spaces, particularly in the city centre where there is a perceived lack of parks, etc.
- **Ryebank Fields**: there is a large campaign to protect Ryebank Fields in Chorlton from any development. This is by far the single biggest message coming from the consultation. The emails include 247 on the subject of Ryebank Fields. Of these, 245 are opposed to development and two are in favour. The main point is that Ryebank Fields should be protected from development by being designated a Local Green Space. Various arguments are given to support this: the fields are close to local homes & accessible to a large number of local residents; well used by local people for activities including exercise (running, walking), dog walking, children's play, foraging; a haven for wildlife with rich biodiversity; help tackle climate change (carbon capture, etc) and improve local air quality, particularly due to the large number of trees; a unique asset in the urban area, and a change to more managed municipal parks.
- **Houses of Multiple Occupancy (HMOs) and student houses**; concern over antisocial behaviour such as rubbish and noise, along with a perception that some areas have too many of these types of homes.

### Comments from Landowners & Developers

We received 22 submissions from land/property owners/developers, mostly via a professional agent. They identify their own land/property holdings and make a case

for development or protection of them. They are supportive of growth and development in general. The specific points made generally relate to promoting their individual sites and interests.

Some of the main points made are as follows:

- Most are supportive of the overall vision, particularly with regard to growth, vibrancy, and connectivity. Some are supportive of other aspects of the plan such as zero carbon.
- City Centre:
  - A number of submissions argue for promotion of the visitor economy including hotels, particularly in the city centre.
  - The owner of parts of Piccadilly Gardens indicates they are broadly supportive of improvements in the area.
  - A flexible approach to development in the city centre is needed.
  - The operator of the Manchester Arena argues in favour of the city centre and against out-of-centre development.
  - The owner of much of King St argues for a flexible approach to the use of such sites.
- Housing:
  - Various arguments are put forward in favour of particular types of housing development.
  - Overall, there is support for a variety of housing types, locations, and tenures.
  - The Home Builders Federation “*support the Council in looking to provide a significant increase in housing provision but consider that the objectives should also seek to ensure that sufficient homes are met to meet local needs and to balance with the economic growth.*”
  - Support for affordable housing subject to viability.
- Other issues raised include:
  - Respondents with land/property outside the city centre argue for a greater emphasis on regeneration/development of communities outside the centre.
  - The Council should not be setting different targets or policies outside of Building Regulations.

### **Comments from Campaigning Organisations**

Campaigning organisations seek to increase awareness of their own areas of interest, often with specific suggestions. The main comments received are as follows:

- A **joint submission** was received from five organisations (**Rising Up! Manchester**

**Families, Climate Emergency Manchester, Greater Manchester Housing Action, Steady State Manchester**). This, or versions of it, was submitted by 90 individual respondents. In addition to specific policy suggestions, points made include:

- The 'momentous change' of the past decade requires a more radical departure from previous approaches
  - Opposed to development of Manchester Airport due to climate change
  - Opposed to the housing growth figures, which they say should be reduced due to 'strain on local infrastructure' and risk of gentrification/'slumification'
  - Opposed to the proposed increase in office floor space, which they say should be reduced due to Covid
  - Propose prioritising wellbeing and environmental considerations including ecology and energy use
  - Prioritise people over cars
  - They question growth projections
  - They propose 'scenario based planning' to take account of an unpredictable future
  - They say that some of the plan's aims contradict others; growth v carbon neutral, development v green space
  - Food Security and supporting biodiversity, and carbon sequestration should be included
  - Prioritise reuse of existing buildings over new development
  - Affordable housing target is too low, and 'loopholes' allowing developers to avoid contributing should be closed
- **Campaign for Real Ale (CAMRA)** are seeking to protect pubs from speculative redevelopment into housing, particularly in the light of the Covid-19 restrictions which are expected to harm the viability of many pubs. They make various suggestions to support the viability of local pubs. They argue for the role of pubs in communities, and tackling loneliness, particularly for older men. They also note the role of 'historic pubs' in Manchester's visitor economy; *"a factor in attracting even more visitors to Manchester is to ensure the preservation and enhancement of its historic public houses."*
  - **Campaign to Protect Rural England (CPRE)**; They support the timely adoption of a local plan to avoid 'off-plan' development. They challenge the growth forecasts, including for jobs, industrial and office floorspace requirements. They argue that the housing requirement is overestimated by 15% and request a review using the ONS 2018 data. They opine that *"Manchester is mostly urban, so the Green Belt, rural fringe and green space is immensely important, and it is for everyone's benefit that we write to champion the value of countryside."*

- **Chorlton Voice**; seek a greater focus on neighbourhoods rather than the city centre, are sceptical of the growth agenda and promote quality of life/environment instead, opposed to HS2 and growth at the airport. They make a number of more detailed policy points.
- **Community-Led Action and Savings Support (CLASS) in alliance with the Greater Manchester Savers network**; argue for much greater emphasis on including disadvantaged people in the policy development process, suggest a wide range of amendments, and argue for a substantial increase in properties available for social rent.
- **Greater Manchester Trust for Recreation**; support the spatial development proposals, particularly relating to housing in/near district centres. Argue for a stronger focus on the needs of young people. They also promote some of their redundant facilities for development.
- **Levenshulme Clean Air**; “a community group of parents and residents in Levenshulme, calling for healthy air for everyone”. They say that communities in Manchester suffer from illegal levels of air pollution which should be tackled through reducing the need to travel, prioritising active & sustainable modes, and ensuring no new development worsens air pollution. They make a number of more detailed policy suggestions.
- **Living Streets**; argue for an urban form that facilitates walking and cycling, prioritising people over cars etc, and make a large number of specific points. They support the emphasis on climate change and improving air quality across the city, and the target to become zero-carbon by 2038. They also argue that the Council’s clean air proposals need to be strengthened, particularly to reduce private car use.
- **Macintosh Village Residents Forum**; largely echo the points made in the joint submission, see above.
- **Manchester & Stockport Canal Society**; argue for the protection of the route of the canal from development, so it can be reopened in future
- **Manchester Civic Society** makes a wide variety of comments. They question the validity of underlying assumptions. Amongst other things, they argue for higher importance to be given to the Victoria Park Conservation Area (also see below), industrial heritage embodied in buildings, and better protection for the setting of listed buildings, most importantly the town hall. They also argue for social housing in the city centre, and feel that this should not be located separately from the development of which it is part. More generally, they opine that built heritage is not valued enough, and that Manchester’s character is being eroded. They note the loss of listed buildings which they say the Council has apparently chosen not to enforce protection.
- **Manchester Friends of the Earth** emphasise that “*the city needs to halve its carbon emissions in the next 5 years and reach zero carbon within the 15 to 20 year timeframe of this plan. And at the same time we must reverse the decline in nature and green spaces to help the city adapt to the changing climate.*” They provide a large number of specific points in support of this

overall goal.

- **Ramblers (Manchester & Salford Ramblers)**; endorse action on climate change as a key issue; opine that new developments should include significant improvements in provision for walking and cycling; suggest that everyone in Manchester should live no more than a 5-minute walk or 300m from a quality green space; and also argue for strong street design standards.
- **Rusholme & Fallowfield Civic Society** are an active civic group in Fallowfield & Rusholme who have organised a significant number of submissions from local people. They make various suggestions but are mainly aiming for a greater emphasis on the areas outside the city centre.
- **Shelter** has provided a detailed response with an analysis of the city's housing/homelessness situation and a policy response to it. In particular, they argue: *"Scaled-up delivery of social-rent housing, by both the Council and housing developers, is what is needed to tackle Manchester's housing emergency. It is the only tenure that will provide a genuinely affordable and quality housing option for the many people in the city experiencing homelessness, who are on the council's housing waiting list, as well as many others who are struggling in unaffordable, inappropriate and poor-quality housing in the city... Local Plans have the potential to act as a useful tool for securing the social-rent housing that communities desperately need, particularly from private sector developers."*
- **Schuster Road & Park Range Residents' Association** (Rusholme); argue for a change in the local housing stock away from student accommodation and HMOs, to help facilitate a more settled and stable community. They argue for more social housing in the area. Wilmslow Road shops should be managed to avoid *'an over-supply of restaurants, take-aways and shisha bars at the expense of local shops'*. Trees, parks and green spaces need better protection. The Victoria Park Conservation Area should be managed as a visitor destination but they suggest it is instead being degraded. They say *"we are proud of our vibrant community, buildings and greenery. We want to share and celebrate Victoria Park with the rest of Manchester and beyond for as many generations to come as possible."*
- **Steady State Manchester** argues for a 'viable economy' particularly to help safeguard the environment - in implied opposition to the Council's growth agenda. They make a large number of specific points, many echoing the joint submission (see above). Amongst other things they strongly oppose development of the airport due to the impact on climate change. They also argue that the consultation was not fully accessible.
- **Theatres Trust**: Make various points but emphasise that the plan should *"continue to place strong focus on the city's cultural provision and facilities, including robust policy protecting from loss of valued venues."* They note that Manchester includes two of the Trust's 'Theatres at Risk': Hulme Hippodrome and Theatre Royal.
- **UK Green Building Council**; supports a commitment to a zero-carbon Manchester by 2038. They make various specific points, including the need to

decarbonise heating of buildings in particular. They are supportive of zero-carbon buildings and make points about how this can be achieved. They also argue for stronger biodiversity commitments.

### Comments from Partner Organisations including Specific Consultees

There are many organisations that the Council works with to deliver or coordinate its work. Many of these are government or voluntary organisations, and include both local and national organisations. They generally seek to make us aware of any practical or technical issues they consider particularly relevant. We mostly already have close working relationships and joint strategies with them.

'Specific Consultees' are organisations that we are required by law to consult; mostly national agencies, utilities, and neighbouring local authorities. See Appendix 2. Not all provided comments but they have generally provided fairly comprehensive submissions at times with technical details. They generally seek to provide practical guidance rather than promoting a particular point of view.

The main comments received are as follows:

- **Canal & River Trust:** Is broadly supportive, and makes various specific policy recommendations and comments. They say "*with 96% of land adjacent to waterways outside the Trust's control, our waterways are vulnerable to the impact of development. We believe however that successful planning policies can help to secure positive place making and high quality developments which both protect and maximise the opportunities presented by our waterways*".
- **City of Trees:** Support the plan's references to the importance and role of Green Infrastructure (GI) in helping to create '*a more liveable, sustainable and resilient Manchester*', but advocate for '*a bolder statement of increasing it to meet the needs of a growing population and help us to adapt to predicted climate change impacts especially flooding.*' They go on to provide more detailed points on the specific proposals.
- **Coal Authority:** No comments at this stage
- **Department for Education (UK Government):** They note that local education authorities must ensure sufficient school places, including at sixth form, and have a key role in securing contributions from development to new education infrastructure. They support the use of planning obligations to secure developer contributions for education. They say that the next version of the Local Plan should seek to identify specific sites which can deliver the school places needed to support growth.
- **Environment Agency:** Broadly support the proposals and give a large number of specific policy points. They say they are "*pleased with the current scope and issues identified for the forthcoming plan, in particular the commitment to improve green spaces/infrastructure and achieve carbon neutrality through sustainable development.*"
- **Highways England:** Provide detailed considerations, and request further dialogue to '*understand the current transport provision, alongside individual*

*and cumulative transport and highway traffic impacts associated with any proposed site allocations likely to impact the SRN.’ In particular, they highlight the area around Manchester Airport and the proposed location of the HS2 station adjacent to M56 Junction 5 as locations of interest.*

- **Historic England:** Disagrees with the draft vision, and questions the underlying assumptions/evidence base. They provide various points about the role of heritage and how it can support the wider objectives of the plan and the city. They say that the profile of heritage in all areas of the plan needs to be increased. Policies should *“engage with heritage in terms of its potential for place making as well as offering clear and positive direction that will support the conservation and restoration of heritage assets at risk, opportunities to gain maximum public value and the need to engage with heritage and local character early in the policy making and design processes.”*
- **Homes England:** Have not provided detailed comments, but state *“The housing ambitions within this Issues Consultation are noted. The Housing Infrastructure Fund allocation recently announced for Manchester supports the delivery of this and we are keen to continue to work with you to fulfil your housing growth ambitions.”*
- **Greater Manchester Minerals & Waste Team:** Welcome the statement that materials and waste will need to come from a new circular economy, involving the reuse and recycling of materials already in circulation, and significantly increased use of sustainable and renewable materials.
- **Manchester Airports Group:** Supports the proposals, which they say *‘recognises the importance and scale of benefits that Manchester Airport provides to the city’*. They argue for *‘a greater focus on the provision of transport infrastructure (across all modes) to support the airport, the Airport Gateway and Airport City’* which would, they say, *‘enhance the area’s accessibility and help ensure that all of Greater Manchester and the site allocations can capitalise on the economic and employment benefits that the Airport brings’*.
- **Manchester City Council - Work & Skills Team:** While they support the vision, they say the objectives should be strengthened by making a clearer link to the inclusive growth/inclusive economy agenda to ensure that growth is sustainable and beneficial to Manchester’s residents and communities, rather than being an end in itself. They go on to provide more detailed comments in support of this view.
- **Manchester Climate Change Agency:** Suggest the inclusion of: *‘Development will be planned to ensure that its location helps to keep Manchester’s direct CO2 emissions (from buildings and transport) within a limited carbon budget and that all aviation emissions from Manchester Airport are consistent with the Paris Agreement, as part of a UK aviation strategy’*.
- **Ringway Parish Council:** Oppose the proposals for growth at and around the airport. They say: *“The current Core Strategy has placed too much emphasis on ‘the growth of Manchester Airport’ ‘as a catalyst for the regional economy’.* *The over development of Manchester Airport formerly Ringway Airport has*

*caused untold devastation to Ringway Parish and other Manchester communities living in its shadow.”*

- **Manchester College (LTE Group):** Suggest that there should be more of a focus on the areas outside the city centre.
- **National Grid:** Advise of the location of specific assets, at Heaton Park and the Mersey Valley.
- **Network Rail:** Request protection of existing rail freight facilities at nine sites (not all within the MCC area), and say they are concerned about the ability of our stations and infrastructure to cope with the extra number of people expected/encouraged by the local plan. They request ‘commensurate infrastructure funding / developer contributions’.
- **NHS:**
  - **Manchester University NHS Foundation Trust:** Detailed comments submitted with regard to North Manchester General Hospital, Crumpsall. They outline “*how the exciting and unparalleled regeneration of the NMGH site can transform it into an integrated and vibrant healthcare-hub*”. Further details on their other hospital sites may follow at later stages of the plan process.
  - **NHS Property Services Ltd.:** Substantial rebuilding and expansion of hospital and other health facilities is expected, with potentially some funding using S106/CIL.
- **Sport England:** broadly agree with the Vision and Objectives but feel the health & wellbeing element can be strengthened, and provide a number of detailed policy points to support this. They also state: “*It is strongly advised to avoid the use of local standards for outdoor sport and instead include a policy for obtaining developer contributions. Sport England has been working ... to help the Council prepare a process for calculating appropriate contributions for sport based on the evidence and to link that to a Local Plan policy.*”
- **Trans Pennine Trail:** Generally support the proposals, particularly around sustainable transport.
- **Transport for Greater Manchester (TfGM):** Detailed response including the following key points:
  - One slight variation on the spatial principles set out in 2.11 could include the promotion of or support for, further commercial and residential development around Wythenshawe town centre to complement the development of a second economic hub around Manchester Airport.
  - The proposed HS2 station at Manchester Airport will also offer the opportunity of increase investment, whilst the station itself will not be within Manchester the investment opportunities will be around the Airport especially if there are good transport connections to the proposed HS2 station, such as an extension to Metrolink.

- Additional issues to address include:
  - The poor quality of the walking and cycling network and public realm in many locations across all three areas – the challenge also includes maintaining the network where it has been upgraded.
  - Conflict between different users of the highway network and achieving community and local stakeholder support/buy-in to re-allocate road space to overcome these conflicts.
  - Air quality in some locations.
- There will also be a need to expand the existing GM EV charging infrastructure network which provides access to public EV charging.
- Achieving Greater Manchester’s carbon targets will require substantial reductions in carbon emissions from transport.
- The importance of linking the GM 2040 Transport Strategy sets out a Transport Vision for “World class connections that support long-term sustainable economic growth and access to opportunity for all. The 2040 Transport Strategy, 5 year Delivery Plan will set out the transport interventions required across GM for the next 5 years.
- Agree that the Local Plan should address all parking needs;
- Suggest the need for policies that help encourage increased levels of active travel; aid the implementation of a Streets for All approach; and that aid the implementation of the GM Clean Air Plan will also contribute to delivering better health outcomes.
- **United Utilities:** Broadly supportive; wish to engage early on particular large sites and proposals; support the sustainability proposals, particularly regarding surface water and drainage (climate change).