



Standish Voice  
Speaking up for Standish

## **SUBMISSION TO THE CONSULTATION ON THE GREATER MANCHESTER SPATIAL FRAMEWORK**

### **Chapter 1 – Introduction**

Question 6: Do you agree that we need a plan for jobs and homes in Greater Manchester?

Strongly Agree. Standish Voice supports the provision by the Greater Manchester Combined Authority (GMCA) of a single plan for sustainable growth in the region over the plan period.

Question 7: Do you agree that to plan for jobs and homes, we need to make the most effective use of our land?

Strongly Agree. Efficient use of land is essential to ensure that the demands for future suitable and appropriate housing, employment and industrial land as well as infrastructure can be met for local needs.

Question 8 – Do you agree that in planning for jobs and homes, we also need to protect green spaces that are valued by our communities?

Strongly agree. Green space is able to provide numerous social and environmental benefits. They have been shown to improve physical health, as well as the mental wellbeing of the communities that they serve. They are also important in increasing air quality, mitigating potential sources of flooding, and provide invaluable wildlife habitat.

Question 9 – Do you agree that to protect green spaces, we need to consider how all land in Greater Manchester is used?

Strongly Agree. In order to best protect those green spaces most valued by communities, the GMCA needs to first understand how those communities use the green space in question. It is important that this information is gathered and assessed, so that those green spaces that truly have a value to the local community can be best protected, and opportunities to enhance and improve green space that isn't adding as much value as it could are identified. Green Belt land must be protected.

Standish Voice would welcome the inclusion of a method to calculate net biodiversity gain/loss, to provide a metric against which all proposals in Greater Manchester are measured and compared. In being able to allocate land for development for any use on greenfield land, the GMCA needs the confidence to know that the most appropriate land is being chosen in the context of providing sustainable development.

Question 10: Is the approach that we have outlined in the plan reasonable?

Agree. We agree that the preparation of the GMSF is reasonable. Standish Voice would welcome the inclusion of provision to review the plan, when appropriate, to ensure it remains up to date when considered alongside all other relevant policy documents.

## **Chapter 2 – Context**

Question 11: Do you have any comments about the context of the plan? The context is considered to be broadly reasonable for sustainable development.

## **Chapter 3 – Our Vision**

Question 12: Do you agree with the Strategic Objectives? Agree. Standish Voice generally supports the Strategic Objectives.

We do, however, consider that it is vital that the document agrees a GM definition of Affordable Housing before the plan comes into force. It is possible that if a definition is not provided, a less than optimum mix of affordable housing will come forward during the period a definition is being formulated.

Objective 7 sets a target of Carbon Neutral new developments by 2028, Standish Voice fully supports this. However, a clear definition of what is “Carbon Neutral” is required. It is important to note that the carbon neutral requirements must apply to all tenures on all schemes. We believe that all new homes should be constructed with a fabric first approach to maximize thermal performance, reduce energy consumption and address fuel poverty.

## **Chapter 4 – Our Strategy**

Question 13: Do you agree with the Spatial Strategy? Agree.

The strategy of focusing growth in the northern towns to boost economy, and in the city centre where there is the greatest level of services and facilities is sensible, and will create a region with many thriving centres contributing to the overall strength of Greater Manchester.

The Spatial Strategy needs to ensure that a balance of housing is met across the 10 boroughs to ensure sustainable communities for the whole plan period.

Question 14: Do you agree with the proposed policy on the Core Growth Area? Agree. Standish Voice acknowledges that focusing a high level of employment, residential and infrastructure related development in the Core Growth Area is a logical approach by the GMCA. As the Core Growth Area is the area best served by public transport infrastructure, focusing growth here will contribute towards achieving the objectives relating to sustainable development and air quality.

Question 15: Do you agree with the proposed policy on the City Centre? Strongly Agree. Standish Voice welcomes the approach taken by the GMCA to focus on infrastructure for public transport, walking and cycling, as well as significant commitments to commercial and residential growth. It is considered a sustainable approach that will help the City Centre grow in terms of economic, social, and environmental sustainability. We strongly support city centre development to help reduce commuting and reduce air pollution.

Question 18: Do you agree with the proposed policy on the inner areas? Agree. Standish Voice agrees that the inner areas represent an excellent opportunity for development that compliments the thriving City Centre.

Question 19: Do you agree on the proposed policy on Northern Areas? Mostly agree, though the focus of residential development should be in areas of highest need and both type and tenure should address local needs.

Question 21: Do you agree with the proposed policy on the Wigan/Bolton Growth Corridor? Strongly agree. This may help to alleviate traffic congestion through the village of Standish from Junction 27 of the M6.

Question 22: Do you agree with the proposed policy on Southern Areas?  
See response to Question 19.

Question 23: Do you agree with the proposed policy on Manchester Airport?  
Agree

Question 25: Do you agree with the proposed policy on Main Town Centres?  
Agree. The protection of local distinctiveness is supported to ensure that the main town centres remain recognisable and unique. A diverse offer will only benefit Greater Manchester in its goal to attract and retain people and investment, and these main towns often provide the sense of identity within their boroughs.

Greater Manchester Town Centre Challenge has a number of successful and proposed areas in which it will operate and this needs to be incorporated into the plan so that existing commitments remain throughout the plan period. Wigan & Bolton Housing Investment Fund Bid and potential investments in transport and residential developments needs to be considered within the plan policy.

Question 26: Do you agree with the proposed policy on Strategic Green Infrastructure?  
Agree. Standish Voice supports protection and enhancement of green infrastructure assets

Question 27: Do you agree with the proposed policy on a Sustainable and Integrated Transport Network?  
Agree. Standish Voice supports having an integrated Transport network with new development having a significant role in order to reduce car dependency and increase levels of walking, cycling and public transport.

## **Chapter 5 – A Sustainable and Resilient Greater Manchester**

Question 28: Do you agree with the proposed policy on Sustainable Development?  
Strongly agree. Standish Voice welcomes the emphasis placed upon the three pillars of sustainability as detailed within the NPPF. Standish Voice also welcomes the preference for brownfield development. Standish Voice wishes to highlight that remediation costs of brownfield land can be greatly exaggerated, especially when developers are obliged to provide affordable homes through Section 106 Agreements, and 'viability' should not be allowed as an excuse not to redevelop brownfield sites.

Question 29: Do you agree with the proposed policy on Carbon and Energy? Strongly agree.  
See response to Question 12 and Objective 7.

## **Chapter 6 – Prosperous Greater Manchester**

Question 30: Do you agree with the proposed policy on Heat & Energy Networks?

Agree. Standish Voice supports the delivery of renewable and zero carbon energy schemes.

Question 31: Do you agree with the proposed policy on Resilience?

Strongly agree. Standish Voice particularly supports improving safety through design, improving internal and external environments, and increasing size, quality and interconnectedness of green infrastructure networks. We also support the delivery of a new affordable homes target, and supporting healthier lifestyles.

Question 32: Do you agree with the proposed policy on Flood Risk and the Water Environment?

Agree.

Question 33: Do you agree with the proposed policy on Clean Air?

Strongly agree. Standish Voice supports all measures proposed.

Question 34: Do you agree with the proposed policy on Resource Efficiency?

Mostly agree.

Question 36: Do you agree with the proposed policy on Supporting Long-Term Economic Growth?

Agree. Standish Voice supports the policy for supporting long term economic growth. The diverse nature of Greater Manchester's economy is an asset, and it should be reinforced and strengthened.

Question 37: Do you agree with the proposed policy on Employment Sites and Premises?

Agree.

## **Chapter 7 – Homes for Greater Manchester**

We support the focus on new build homes and the allocations and policies which support this; however, there is concern that there is limited consideration for existing stock which has potential to unlock different methods to meet housing need. Providing a mix of tenures and properties, including bungalows and accommodation for older people, could provide opportunities for down-sizing, bringing larger family homes onto the market again.

Question 41: Do you agree with the proposed policy on the Scale of New Housing Development?

Mostly agree.

Question 42: Do you agree with the proposed policy on the Affordability of New Housing?

Agree. We are pleased to see that there is a significant increase in the supply of new affordable housing throughout the plan. There is general support for the tenure split within the affordable homes for meeting the requirements of affordable rent, social rent and affordable home ownership. It is important that the affordable housing provision is provide off-site only in exceptional circumstances to ensure developers meet their Section 106 obligations.

Given the brownfield preference and the desire to hit certain space standards, Standish Voice would recommend that where possible affordable housing is secured by planning condition as this allows Homes England grant funding to be secured. Grant isn't available for S106 properties. This funding would greatly aid the viability of the more constrained sites in the region, and would facilitate the provision of more properties for social rent. S106 still forms a valuable supply of affordable housing however and should still be sought in all instances.

Question 43: Do you agree on the proposed policy on the Type, Size and Design of New Housing?  
Agree. Standish Voice supports entirely the adoption of Nationally Described Space Standards and Part M4(2) of the Building Regulations. A mix of housing that is diverse in terms of type, size, tenure and design is vital, and it is considered appropriate that this should be determined at a local level to maximise area distinctiveness and retain local character and identity.

Standish Voice is very pleased that the plan supports innovation in housing delivery including Modern Methods of Construction.

Question 44: Do you agree with the proposed policy on the Density of New Housing?  
Mostly agree. Standish Voice supports the inclusion of a policy on housing densities. It is important that cities, main towns and other areas have different densities to ensure that the right amount of development comes forward in these areas.

Question 45: Do you have any further comments on the policies and overall approach proposed in Homes for Greater Manchester?

The Housing Land supply should reflect the needs of the area based on supporting documents such as the Strategic Housing Market Assessments; this will ensure that the requirements of the boroughs are considered.

#### Chapter 8 – A Greener Greater Manchester

Question 46: Do you agree with the proposed policy on Valuing Important Landscapes?  
Agree

Question 47: Do you agree with the proposed policy on The Green Infrastructure Network?  
Agree. Standish Voice full supports this policy.

Question 51: Do you agree with the proposed policy on Urban Green Space?  
Strongly agree. Standish Voice is fully supportive of the proposals.

Question 52: Do you agree with the proposed policy on Trees and Woodland?  
Agree.

Question 54: Do you agree with the proposed policy on Standards for a Greener Greater Manchester?  
Agree

Question 55: Do you agree with the proposed policy on the Net Enhancement of Biodiversity?  
Agree

Question 56: Do you agree with the proposed policy on the Greater Manchester Green Belt?  
Agree

#### Chapter 9 – A Greater Manchester for Everyone

Question 58: Do you agree with the proposed policy on Sustainable Places?  
Agree.

Question 59: Do you agree with the proposed policy on Heritage?

Agree

Question 60: Do you agree with the proposed policy on New Retail and Leisure Uses in Town Centres?

Agree

Question 61: Do you agree with the proposed policy on Education, Skills & Knowledge?

Agree – particularly with housing developers making a financial contribution.

Question 62: Do you agree with the proposed policy on Health?

Agree

Question 63: Do you agree with the proposed policy on Sport & Recreation?

Agree

## **Chapter 10 – A Connected Greater Manchester**

Question 65: Do you agree with the proposed policy on World Class Connectivity?

Agree

Question 67: Do you agree with the proposed policy on the Walking and Cycling Network?

Agree. Standish Voice is fully supportive as this policy promotes health and wellbeing, and can help to mitigate traffic congestion.

Question 69: Do you agree with the proposed policy on the Transport Requirements of New Development?

Agree. The policy provides a good level of guidance for new developments, to focus on locational sustainability as well as subtle changes to proposals to encourage sustainable behaviour during construction and the end use. Both aspects are vital in ensuring long term sustainability of new developments. This policy is complimented by the strong focus by the GMCA on investing in infrastructure to improve the public transport of Greater Manchester, as well as walking and cycling networks.

Question 70: Do you agree with the proposed policy on Highways Infrastructure Improvements?

Agree

Question 72: Do you agree with the proposed policy on Streets for All?

Agree

## **Chapter 11 – Allocations**

Question 133: Do you agree with the proposed policy GM Allocation 48: M6 Junction 25?

Agree

Question 138: Do you have any further comments on the proposed allocations?

Standish Voice supports the proactive approach taken by the GMCA in identifying appropriate strategic allocations across all boroughs. This provides a consistent approach to meeting the long term development needs of Greater Manchester.

Question 139: Do you agree with the proposed policy on Infrastructure Implementation?

Agree. Standish Voice is fully supportive of a co-ordinated approach to avoid disruption to local communities.

## **Chapter 12 – Delivering the Plan**

Question 140: Do you agree with the proposed policy on Developer Contributions?

Strongly agree. We suggest that a standard tool for assessing viability is used – the old Homes & Communities Agency Viability tool is perfectly appropriate for use.

As previously outlined, Homes England grant funding is not available on affordable homes secured via S106. Standish Voice would therefore request that, wherever possible, affordable homes delivered directly by Housing Associations are secured by planning condition.