Holcroft Moss Planning Obligations Joint Supplementary Planning Document

Consultation Statement

January 2025



1.Introduction

- 1.1. This is the Consultation Statement for the Holcroft Moss Planning Obligations Joint Supplementary Planning Document (SPD), which has been prepared by the nine Places for Everyone Plan local authorities¹. It has been prepared in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012.
- 1.2. The previous Consultation Statement that accompanied the Consultation Draft SPD is available to view on the Greater Manchester Combined Authority's (GMCA) website.

2. Town and Country Planning Regulations (2012)

- 2.1. Before adoption of an SPD, Regulation 12 (a) requires a Local Planning Authority to prepare a Statement setting out: who has been consulted while preparing the SPD; a summary of the main issues raised; and how these issues have been addressed in the SPD.
- 2.2. Regulation 12(b) requires a Consultation Statement to be published as part of the formal consultation on the SPD, where formal representations are then invited under Regulation 13. Regulation 12(b) also requires SPDs to be published for a minimum 4-week consultation, specify the date when responses should be received, and identify the address to which responses should be sent.
- 2.3. Regulation 35 requires the consultation documents to be made available during the consultation period online and at the principal office in the local authority area and other place(s) within the area that are considered appropriate.

¹ Bolton Council, Bury Council, Manchester City Council, Oldham Council, Rochdale Council, Salford City Council, Tameside Council, Trafford Council and Wigan Council.

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3. Statement of Community Involvement

3.1. The nine local authorities of the joint SPD have produced individual Statements of Community Involvement (SCI). These documents outline how each authority will consult and involve people in the preparation of Local Plans and other planning documents, including SPDs, such as this one. Consultation on the SPD was carried out in line with the principles of these documents in each of the local authority areas.

4. Data Protection

4.1. In undertaking public consultation, we must act in accordance with the requirements of the general data protection regulations (UKGDPR). Consultation on the SPD was undertaken in accordance with our Privacy Policy available on <u>GMCA website</u> which advises on how we use, manage and store your data inline with the UKGDPR.

5. Consultation Undertaken in Preparing the SPD

- 5.1. During the preparation stages of the Draft SPD, engagement took place with key stakeholders and partners to inform the content of the SPD for formal consultation. This engagement included with the Warrington Borough Council and Natural England.
- 5.2. In response to the engagement undertaken during preparation stages of the SPD, the scope and nature of the SPD was refined to ensure that effective and appropriate mitigation measures could be secured for the Holcroft Moss.
- 5.3. It should be noted that account was also taken of relevant evidence underpinning the Places for Everyone Plan, when developing the Draft SPD for consultation.

Consultation undertaken on the Draft SPD

5.4. A formal six-week public consultation was undertaken on the Draft SPD from 01 November to 12 December 2024. The GMCA managed the consultation on behalf the nine joint SPD local authorities.

- 5.5. As part of the formal consultation the nine joint SPD local authorities consulted widely with the following groups:
 - Residents, organisations and other stakeholders registered on the local planning database in each local authority
 - Parish and Town Councils
 - Elected Members
 - Statutory Consultees
 - Neighbouring Local Planning Authorities

Availability of Consultation Documents

- 5.6. During the consultation period the Draft SPD and supporting documentation were available to view on the <u>GMCA website</u>.
- 5.7. They were also available to view electronically and/or in hard paper format at deposit points in nine local authority areas as identified in the Consultation Statement and Representation Guidance Note for the Draft SPD available in the <u>GMCA website</u>.
- 5.8. Representations to the SPD consultation were invited through the online consultation portal GM Consult, by email or by post. A Consultation and Representation Guidance Note was produced to help people respond to the consultation and a template response form could be used for email and postal responses if required.
- 5.9. Queries about the consultation could be made by email and by telephone to the GMCA's Planning and Housing Team.

SPD Consultation Publicity and Promotion

5.10. The GMCA and the nine joint SPD local authorities publicised the consultation through a variety of methods including press releases, newsletter bulletins, social media posts and mailouts to people and organisations on the local planning databases in each authority. A full list of the publicity and promotional activities is at Appendix 1 of this Statement.

6. Summary of main issues raised during the consultation

- 6.1. The GMCA received representations from 24 respondents to the SPD consultation. A summary of the issues raised during the consultation and how the nine local authorities have responded to those issue in the preparation of the final SPD is shown in the table in Appendix 2. The table also indicates which organisation or individual made the comments.
- 6.2. From the main issues raised by organisations and individuals. the issues outlined below were the most relevant:
 - Support for the SPD to protect important mossland habitats.
 - Concerns that it will be difficult for Transport Assessments to accurately estimate the number of vehicles generated from development that would travel past Holcroft Moss on the M62 Motorway, especially from developments that are further afield.
 - The cost of the per development contribution towards Holcroft Moss should be adjusted take account of electric vehicles that will not emit polluting emissions.
 - The costs of the mitigation measure as presented in the SPD too vague.
 - The SPD is overly complicated.
- 6.3. It is considered that none of these comments warrant any amendments to the final SPD. The reasons being are that PfE Policy JP-C8 states that Transport Assessments should be subject to consultation at the pre-application stage with the relevant highway authority, allowing the scope of the assessment to be agreed to ensure that impact on Holcroft Moss is sufficiently assessed. On electric vehicles, there is insufficient evidence to guarantee that sufficient levels of cleaner vehicles would exist to reduce the need for mitigation, including an adjustment to the contributions to account for this. On the costs, the estimated project costs have been produced in consultation with Warrington Borough Council and Natural England and the level of detail is considered appropriate for an SPD, such as this one. Lastly, it is considered that the guidance provided

in the SPD is appropriate for the main users of the document, i.e. planning and highways professionals responsible for preparing and considering planning applications within the PfE Plan area.

6.4. Further details about the comments and the responses to them are shown in the table Appendix 2. No other comments received on the SPD during the consultation warrant any amendments to the final SPD.

Appendix 1: SPD Consultation Publication and Promotion Activities

The table below lists the methods employed by the GMCA and the nine joint SPD local authorities to publicise and promote the consultation on the Holcroft Moss Planning Obligations Joint SPD.

Organisation	SPD consultation publication and promotion activities	
GMCA	Social Media posts shared on GMCA X, Facebook, Instagram and LinkedIn.	
	Social Media pack and newsletter text shared to GM Heads of Comms and added to GMCA website	
	for partners	
	Press release shared with media outlets and added to news page of the GMCA site. Story featured	
	in BBC News and Place North West.	
	 Press release shared in fortnightly Equality Panel bulletin which goes to the 7 facilitating 	
	organisations of the GM Equality Panels. Also shared amongst GM engagement contacts.	
	• Shared in GMCA stakeholder newsletter. This has a circulation of around 3,600 and an open rate of	
	60%.	
Bolton Council	Letters and emails to our LDF consultation list, which included councillors.	
	 Information supplied to libraries and One-Stop-Shop. 	
	 Pushed out through the council's main consultation page. 	
	 Pushed out through Planning's Supplementary Planning page. 	
	 Social media through the council's Facebook page. 	
	• Sent out to e-View (resident consultation database) via the consultation bulletin.	

Organisation	SPD consultation publication and promotion activities			
Bury Council	Sent letters/emails to all contacts on our consultation database;			
	Published the consultation on our website;			
	Made documents available to view electronically at Bury Town Hall between the hours of 8.45am			
	and 5.00pm (Monday-Friday) and at local libraries and the Tottington Centre during their normal			
	opening hours (see www.bury.gov.uk/libraries and www.tottingtoncentre.co.uk for details);			
	Publicised the consultation via social media (X).			
Manchester City	Manchester publicised the Holcroft Moss consultation via the local plan database, mailing out to all			
Council	consultees (will check number and add). All ward members of the Council received a notification as			
	part of the general mail out. The document was also available in hard copy format from the Central			
	Library in Manchester. The consultation featured in the Council's website with summary information			
	that linked across to the main consultation webpage operated by the GMCA.			
Oldham Council	Published a public notice for the SPD in the Oldham Times on 31 October 2024.			
	Sent emails / letters out to everyone on the Oldham local plan mailing list and to local councillors,			
	district coordinators, planning officers and other internal officers, Oldham leadership board and			
	Oldham housing management board.			
	Placed a copy of the consultation documents in all public libraries and in Oldham Council's principal			
	office (spindles reception).			
	 Placed information on the Oldham Council website directing to GMCA website. 			
	Social media messages.			

Organisation	SPD consultation publication and promotion activities	
Rochdale Council	A link from our website Supplementary Planning Documents (SPDs) and guidance Planning briefs	
	and Supplementary Planning Documents Rochdale Borough Council.	
	 emails and letters to those on our consultation database. 	
	emails to elected members.	
	 hard copies of the SPD and consultation statement placed in our four main libraries (Heywood, 	
	Littleborough, Middleton and Rochdale).	
Salford City Council	 Emails sent to 1,478 consultees registered on SCC spatial planning database. 	
	 Postal letters sent to 2 consultees registered on SCC spatial planning database. 	
	Hard copies of Draft SPD, estimated project costs, and consultation statement and representation	
	guidance note made available at Civic Centre reception and Libraries at Gateway Centres (Eccles,	
	Pendleton, Swinton and Walkden) and Broughton Hub.	
	 SCC social media account posts (X, and Facebook). 	
	 Dedicated webpage on SCC website: Holcroft Moss Supplementary Planning Document•Salford 	
	City Council.	
Tameside Council	Posted consultation letters to notify contacts from the Tameside Local Plan consultation database.	
	 Sent consultation emails to notify contacts from the Tameside Local Plan consultation database. 	
	 Updated the Council's SPD webpage with details and links for the SPD. 	
	Placed printed copies of the consultation material in all of the Council's libraries for the duration of	
	the consultation period.	

Organisation	SPD consultation publication and promotion activities		
	• Inclusion in Place Newsletter for Cllr and staff – 3 times throughout the period (8 Nov, 15 Nov, and		
	6 Dec);		
	 Featured in the staff newsletter and weekly Communications network email to partners; 		
	 Featured in weekly business email once too; 		
	 Social Media Channels – and shared across partner channels – Be Well Tameside 		
	Facebook – twice a week throughout the period		
	https://www.facebook.com/share/p/qZvqYmites54WWUY/		
	 LinkedIn – twice throughout the period and shared 		
	 Once a week on X https://x.com/TamesideCouncil/status/1867175086110753148 		
Trafford Council	Email notifications sent to all Council Members at Trafford Council about the consultation.		
	Email notifications to approximately 470 organisations and individuals on Trafford Council's		
	database for consultations on planning policy.		
	Hard copies of the consultation documents were made available at deposit locations across the		
	Borough.		
	Details of the consultation were included on the Strategic Planning consultations and Places for		
	Everyone sections of Trafford Council's website for the duration of the consultation period.		
	Publicity material for the consultation was shared on the Council's social media channels.		
	 A press release was posted to the News section of the Trafford Council website. 		

Organisation	SPD consultation publication and promotion activities	
Wigan Council	sent email notifications to all individuals and organisations on Wigan's consultation database at the	
	beginning of the consultation period on 1 November.	

Appendix 2: Summary of main issues raised to the SPD consultation and summary of response to the issue raised

The table below summarises the main issues raised to the SPD consultation, how the issues have been addressed in preparing the final SPD and which organisation or individual made the comments.

Summary of main issues raised	Summary of response to issues raised	Respondent(s)
Natural England are satisfied that the	Supported for SPD noted.	Natural England.
requirements of paragraph 17 of Places		
for Everyone (PfE) policy JP-C8:		
Transport Requirements of New		
Development that relate to Holcroft Moss		
are adequately reflected in the SPD and		
have no further comments to make.		
Support for measures to minimise air	Support for the SPD and information on how National	National Highways.
pollution impacts on Holcroft Moss and	Highways review Transport Assessment data is	
measures to shift to more sustainable	noted.	
travel options.		
National Highways does scrutinise		
Transport Assessments submitted with		
planning applications where there may be		

Summary of main issues raised	Summary of response to issues raised	Respondent(s)
an impact to the Strategic Road Network,		
the M62 included. Their reviews generally		
include a check of a planning applicant's		
transport data to determine whether it is a		
reasonable reflection of a site's likely trip		
generation. They usually share these		
reports as part of their planning		
responses and recommend that Local		
Planning Authorities use this data as a		
guide to the whether an applicant's		
figures are accurate.		
Support for the draft Holcroft Moss	Support for SPD noted.	Warrington Borough Council
Planning Obligations SPD.		
The draft SPD is consistent with the		
approach that Warrington Borough		
Council has taken in its Planning		
Obligations SPD (July 2024) and follows		
on from the Statement of Common		
Ground between Warrington Borough		
Council, the Greater Manchester		

Summary of main issues raised	Summary of response to issues raised	Respondent(s)
Combined Authority, the Places for		
Everyone authorities and Natural		
England that was signed in November		
2022.		
The SPD will provide a robust basis to		
ensure the timely provision of required		
mitigation at Holcroft Moss, within the		
Manchester Mosses Special Area of		
Conservation (SAC), which is within the		
Warrington Borough Council's		
administrative area.		
Although Holcroft Moss is technically in	Support for protection of Holcroft Moss noted.	Councillor Robinson-Smith,
Warrington, the moss lands is one place		Salford City Council
and space, and at that, one of the most		
important spaces in Greater Manchester		
and its delicate ecology is impacted by		
happenings across the interconnected		
lowlands, so I am keen to see Holcroft		
Moss protected appropriately.		

Summary of main issues raised	Summary of response to issues raised	Respondent(s)
Support for the principle of restoration	Support for the SPD and restoration measures noted.	Marj Powner
works on Holcroft to mitigate the impact		Mossley Town Council
of vehicles traffic along the M62.		Lancashire Wildlife Trust
		CPRE Lancashire, Liverpool
		City Region and Greater
		Manchester
Cheshire Wildlife Trust who owns and	Noted that Cheshire Wildlife Trust own Holcroft Moss.	Lancashire Wildlife Trust
manage Holcroft Moss should be	Mitigation works are proposed on land immediately	
engaged on the mitigation restoration	adjacent to Holcroft Moss, outside the ownership of	
works so that the measures	Chesire Wildlife Trust. The mitigation measures have	
fit/complement with existing restoration	been agreed with Warrington Borough Council and	
and management of Holcroft Moss.	with Natural England, who are the responsible	
It is unclear if the mitigation restoration	statutory authority.	
works on Holcroft Moss or on land	Cheshire Wildlife Trust will be engaged as part of the	
adjacent to it.	mitigation works.	
	No change is considered necessary.	
The whole of the Manchester Mosses	The SPD seeks to expand on provision within the	Lancashire Wildlife Trust
SAC is vulnerable to the adverse impact	Places for Everyone Plan to address a specific	
of air pollution.	outcome of the Plan's Habitat Regulations	

Summary of main issues raised	Summary of response to issues raised	Respondent(s)
The remnant mossland habitats that help	Assessment, relating to Holcroft Moss within the	
to connect the three sites of the	Manchester Mosses Special Conservation Area	
Manchester Mosses SAC contribute to	(SAC). The HRA for the Places for Everyone Plan and	
the site improvement plan of the SAC.	HRA for the Warrington Local Plan found that it was	
The approach should be applied to	only the Holcroft Moss compartment of the	
sensitive and vulnerable habitats of all	Manchester Mosses that would be at risk of air	
mossland habitats in Greater	pollution above critical threshold levels.	
Manchester.	No change is considered necessary.	
Concerns that Transport Assessments for	Policy JP-C8 of the Places for Everyone includes	Marj Powner
new development that are not close to	sufficient safeguards to ensure that Transport	
the site could underestimate the number	Assessments for new development will accurately	
of vehicles that would travel along the	estimate the level of traffic associated with the	
M62 from the development.	mitigation, which is the subject of this SPD. The	
	Policy states that Transport Statements should be	
	subject to consultation, at pre-application stage, with	
	the relevant local highway authority.	
	No change is considered necessary.	
Concerns about how outcomes will be	Section 3 of the SPD outlines an appropriate process	Marj Powner
monitored, including that it would be	for the management and monitoring of planning	
difficult to distinguish traffic from new	obligations collected through this SPD. This SPD	

Summary of main issues raised	Summary of response to issues raised	Respondent(s)
development as opposed to traffic from	relates to the funding of necessary mitigation in	
existing development.	relation to applications for new development, it cannot	
	relate to impacts from existing development and/or	
	approvals.	
	No change is considered necessary.	
The restoration measures will benefit	Guidance in relation to sustainable passenger and	Marj Powner
Holcroft Moss, but it would be better to	freight transport is not within the scope of this SPD.	
invest in sustainable passenger and	The SPD seeks to expand on provision within the	
Freight transport to generate genuine	Places for Everyone Plan to address a specific	
reductions in air pollution.	outcome of the Plan's Habitat Regulations	
	Assessment, relating to Holcroft Moss within the	
	Manchester Mosses Special Conservation Area	
	(SAC).	
	Measures exist elsewhere in the Places for Everyone	
	Plan to promote the use of sustainable transport	
	modes.	
	No change is considered necessary.	
The restoration costs and professional	The estimated project costs have been produced in	Alan Atherton
fees costs are too vague and need more	consultation with Warrington Borough Council and	
detail.		

Summary of main issues raised	Summary of response to issues raised	Respondent(s)
	Natural England. The level of detail is considered	
	appropriate for an SPD, such as this.	
	No change is considered necessary.	
Not all vehicles will increase air pollution	The requirement for development to make a financial	Jeremy Williams
as some will be electric, which should be	contribution towards restoration measures at Holcroft	The Emerson Group
accounted for in the costs that qualifying	Moss stems from the HRAs for the Places for	
development would need to pay to create	Everyone Plan and the Warrington Local Plan. Within	
a fairer charging system. Also, as time	the HRAs there was insufficient robust evidence at	
goes by, it is likely that more vehicles will	the time of their production to guarantee that sufficient	
be electric, thus further reducing air	levels of cleaner vehicles would exist to reduce the	
pollution impacts on Holcroft Moss.	need for mitigation. Therefore, until such time that this	
	evidence exists and the PfE policy is reviewed, the	
	thresholds set out in Policy JP-C8 remain extant and	
	cannot be adjusted for cleaner vehicles.	
	.No change is considered necessary.	
The thresholds for when developments	It is considered that if there are slight differences in	The Emerson Group
require Transport Assessments differs	the thresholds for when developments require	
slightly between the PfE authorities.	Transport Assessments across the nine PfE	
Consequently, the requirement to make a	authorities then it will not materially affect the	
planning obligation towards Holcroft	objective of mitigating air pollution impacts on Holcroft	

Summary of main issues raised	Summary of response to issues raised	Respondent(s)
Moss could be inconsistently applied to	Moss, nor is it considered to be contrary to national	
developments across the nine PfE	policy and guidance on the use of planning	
authorities and be contrary to national	obligations relating to: necessity; directly relating to	
policy and guidance on the use of	the development; and fairly and reasonability related	
planning obligations.	in scale and kind to the development.	
	No change is considered necessary.	
The further sites are away from Holcroft	Policy JP-C8 of the Places for Everyone includes	The Emerson Group
Moss it will be more difficult for the	sufficient safeguards to ensure that Transport	
Transport Assessment to accurately	Assessments for new development will accurately	
assess traffic impacts on Holcroft Moss	estimate the level of traffic associated with the	
as traffic tends to dissipate across the	mitigation, which is the subject of this SPD. The	
highway network.	Policy states that Transport Statements should be	
It is not clear how Transport	subject to consultation, at pre-application stage, with	
Assessments would be expected to allow	the relevant local highway authority.	
for such distance dissipation, therefore	No change is considered necessary.	
additional guidance on this point within		
the SPD is requested.		
On review of the SPD Estimated Project	The estimated project costs have been produced in	The Emerson Group
Costs and Required Contributions	consultation with Warrington Borough Council and	
document, it is evident that the GMCA	Natural England.	

Summary of main issues raised	Summary of response to issues raised	Respondent(s)
have considered and estimated a total of	The costs are based on an extract of the strategic	
qualifying development that could	traffic modelling evidence undertaken for the PfE to	
contribute to the bulk of the total	present a broad overview of the PfE allocations and	
contribution sought. Further explanation	existing land supply sites across the nine PfE	
should be provided as to where these	authority areas that could potentially trigger the	
potential qualifying developments are	thresholds for a planning obligation towards Holcroft	
located, and why they are considered to	Moss.	
qualify.	As the traffic modelling evidence for the PfE is at a	
	strategic level it would be misleading to identify	
	potential qualifying sites as the requirement for a	
	development to financially contribution towards	
	mitigation measures on Holcroft Moss will be tested	
	through Transport Assessments in accordance with	
	the thresholds set with PfE Policy JP-C8, Criterion 17.	
The SPD is too complicated.	The purpose of the SPD is to provide clear advice to	Christine Holt
	developers as to what is expected in applications. It	
	expands on provision within the Places for Everyone	
	Plan to address a specific outcome of the Plan's	
	Habitat Regulations Assessment, namely the potential	
	need to mitigate the impact of development elsewhere	

Summary of main issues raised	Summary of response to issues raised	Respondent(s)
	on Holcroft Moss within the Manchester Mosses SAC.	
	It is considered that the guidance provided in the SPD	
	is appropriate for the main users of the document, i.e.	
	planning and highways professionals responsible for	
	preparing and considering planning applications	
	within the PfE Plan area.	
	No change is considered necessary.	
Reducing air pollution from vehicles	The SPD seeks to expand on provision within Policy	John Rowbotham
should be a priority for all new	JP-C8 of the Places for Everyone Plan to address a	
developments, not just development that	specific outcome of the Plan's Habitat Regulations	
would have an impact on Holcroft Moss.	Assessment, relating to Holcroft Moss within the	
	Manchester Mosses Special Conservation Area	
	(SAC).	
	Measures exist elsewhere in the Places for Everyone	
	Plan to improve air quality. However, guidance in	
	relation to these policies is not within the scope of this	
	SPD.	
	No change is considered necessary.	
Concerns about expansion of the M62	The issues do not relate to the content and/or scope	Christine Holt
Motorway near to Holcroft Moss.	of the SPD.	

Summary of main issues raised	Summary of response to issues raised	Respondent(s)
	The SPD does not propose expansion of the M62	
	Motorway. The SPD seeks to expand on provision	
	within the Places for Everyone Plan to address a	
	specific outcome of the Plan's Habitat Regulations	
	Assessment, namely the potential need to mitigate	
	the impact of development elsewhere on Holcroft	
	Moss within the Manchester Mosses SAC.	
	No change is considered necessary.	
There should be more investment in the	The SPD seeks to expand on provision within Policy	Ms Lawrence
bus network to reduce air pollution.	JP-C8 of the Places for Everyone Plan to address a	CPRE Lancashire, Liverpool
There should be other policies and	specific outcome of the Plan's Habitat Regulations	City Region and Greater
actions such as the wider promotion of	Assessment, relating to Holcroft Moss within the	Manchester
alternatives to car transport alongside the	Manchester Mosses Special Conservation Area	
SPD.	(SAC).	
	Measures exist elsewhere in the Places for Everyone	
	Plan to promote the use of sustainable transport	
	modes and to improve air quality. However, guidance	
	in relation to these policies is not within the scope of	
	this SPD.	
	No change is considered necessary.	

Summary of main issues raised	Summary of response to issues raised	Respondent(s)
Concerns about over development in	The issues do not relate to the content and/or scope	Alan Marland
Salford	of the SPD.	
	The SPD seeks to expand on provision within Policy	
	JP-C8 of the Places for Everyone Plan to address a	
	specific outcome of the Plan's Habitat Regulations	
	Assessment, relating to Holcroft Moss within the	
	Manchester Mosses Special Conservation Area	
	(SAC). It does not promote development with Salford.	
	No change is considered necessary.	
Concerns about building on green	The issues do not relate to the content and/or scope	Jane Eberhart
spaces, Green Belt and protected wildlife	of the SPD.	Christine Holt
sites, including the Holcroft Moss site.	The SPD seeks to expand on provision within the	John Rowbotham
	Places for Everyone Plan to address a specific	Andrew Readwin
	outcome of the Plan's Habitat Regulations	Katherine Fieldsend
	Assessment, namely the potential need to mitigate	
	the impact of development elsewhere on Holcroft	
	Moss within the Manchester Mosses SAC. It does not	
	propose building on green spaces such as those	
	referred in the representations.	
	No change is considered necessary.	

Summary of main issues raised	Summary of response to issues raised	Respondent(s)
No comments on the SPD.	Noted.	Kirklees Council
		Historic England
		Canal and River Trust
		Coal Authority
		Sport England
		Manchester Airport Group