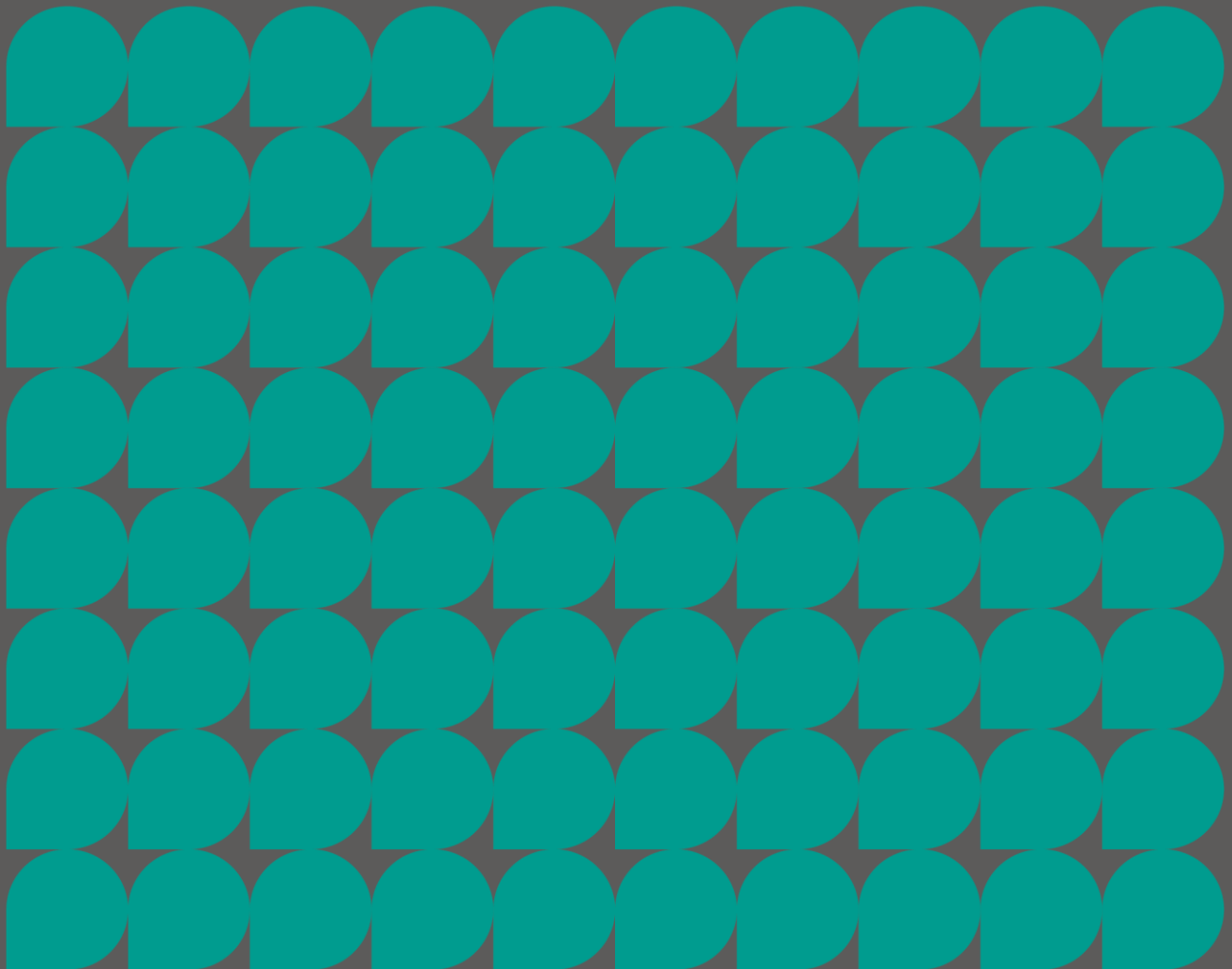


Holcroft Moss Planning Obligations Joint Supplementary Planning Document

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.

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 [GMCA website](#) which advises on how we use, manage and store your data in line 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 [GMCA website](#).

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 [GMCA website](#).

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 issues 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 are 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	<ul style="list-style-type: none">• 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	<ul style="list-style-type: none">• 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	<ul style="list-style-type: none"> • 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 Council	<ul style="list-style-type: none"> • Manchester publicised the Holcroft Moss consultation via the local plan database, mailing out to all consultees . 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	<ul style="list-style-type: none"> • 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	<ul style="list-style-type: none"> • 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	<ul style="list-style-type: none"> • Emails sent to 1,478 consultees registered on SCC spatial planning database. • Postal letters sent to 2 consultees registered on SCC spatial planning database, who have not provided an email address. • 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	<ul style="list-style-type: none"> • 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.

Organisation	SPD consultation publication and promotion activities
	<ul style="list-style-type: none"> Placed printed copies of the consultation material in all of the Council's libraries for the duration of the consultation period. 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	<ul style="list-style-type: none"> 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.

Organisation	SPD consultation publication and promotion activities
Wigan Council	<ul style="list-style-type: none"> <li data-bbox="573 252 1749 287">• A press release was posted to the News section of the Trafford Council website. <li data-bbox="573 312 2018 403">• 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 Supplementary Planning Document (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 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.	Supported for SPD noted.	Natural England.
Support for measures to minimise air pollution impacts on Holcroft Moss and measures to shift to more sustainable travel options. National Highways does scrutinise Transport Assessments submitted with planning applications where there may be	Support for the SPD and information on how National Highways review Transport Assessment data is noted.	National Highways.

Summary of main issues raised	Summary of response to issues raised	Respondent(s)
<p>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.</p>		
<p>Support for the draft Holcroft Moss Planning Obligations SPD.</p> <p>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</p>	<p>Support for SPD noted.</p>	<p>Warrington Borough Council</p>

Summary of main issues raised	Summary of response to issues raised	Respondent(s)
<p>Combined Authority, the Places for Everyone authorities and Natural England that was signed in November 2022.</p> <p>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.</p>		
<p>Although Holcroft Moss is technically in Warrington, the moss lands is one place 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.</p>	<p>Support for protection of Holcroft Moss noted.</p>	<p>Councillor Robinson-Smith, Salford City Council</p>

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

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

Summary of main issues raised	Summary of response to issues raised	Respondent(s)
development as opposed to traffic from existing development.	relates to the funding of necessary mitigation in 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 Holcroft Moss, but it would be better to invest in sustainable passenger and Freight transport to generate genuine reductions in air pollution.	Guidance in relation to sustainable passenger and freight transport is not within the scope of this SPD. The SPD seeks to expand on provision within the PfE Plan to address a specific outcome of the Plan's HRA, relating to Holcroft Moss within the Manchester Mosses SAC. Measures exist elsewhere in the PfE Plan to promote the use of sustainable transport modes. No change is considered necessary.	Marj Powner
The restoration costs and professional fees costs are too vague and need more detail.	The estimated project costs have been produced in consultation with Warrington Borough Council and Natural England. The level of detail is considered appropriate for an SPD, such as this. No change is considered necessary.	Alan Atherton

Summary of main issues raised	Summary of response to issues raised	Respondent(s)
Not all vehicles will increase air pollution as some will be electric, which should be accounted for in the costs that qualifying development would need to pay to create a fairer charging system. Also, as time goes by, it is likely that more vehicles will be electric, thus further reducing air pollution impacts on Holcroft Moss.	<p>The requirement for development to make a financial contribution towards restoration measures at Holcroft Moss stems from the HRAs for the PfE Plan and the Warrington Local Plan. Within the HRAs there was insufficient robust evidence at the time of their production to guarantee that sufficient levels of cleaner vehicles would exist to reduce the 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.</p> <p>No change is considered necessary.</p>	<p>Jeremy Williams</p> <p>The Emerson Group</p>
The thresholds for when developments require Transport Assessments differs slightly between the PfE authorities. Consequently, the requirement to make a planning obligation towards Holcroft Moss could be inconsistently applied to developments across the nine PfE authorities and be contrary to national	<p>It is considered that if there are slight differences in the thresholds for when developments require Transport Assessments across the nine PfE authorities then it will not materially affect the objective of mitigating air pollution impacts on Holcroft Moss, nor is it considered to be contrary to national policy and guidance on the use of planning obligations relating to: necessity; directly relating to</p>	The Emerson Group

Summary of main issues raised	Summary of response to issues raised	Respondent(s)
policy and guidance on the use of planning obligations.	the development; and fairly and reasonability related in scale and kind to the development. No change is considered necessary.	
The further sites are away from Holcroft Moss it will be more difficult for the Transport Assessment to accurately assess traffic impacts on Holcroft Moss as traffic tends to dissipate across the highway network. It is not clear how Transport Assessments would be expected to allow for such distance dissipation, therefore additional guidance on this point within the SPD is requested.	Policy JP-C8 of the PfE Plan includes sufficient safeguards to ensure that Transport Assessments for new development will accurately estimate the level of traffic associated with the 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.	The Emerson Group
On review of the SPD Estimated Project Costs and Required Contributions document, it is evident that the GMCA have considered and estimated a total of qualifying development that could contribute to the bulk of the total	The estimated project costs have been produced in consultation with Warrington Borough Council and Natural England. The costs are based on an extract of the strategic traffic modelling evidence undertaken for the PfE to present a broad overview of the PfE allocations and	The Emerson Group

Summary of main issues raised	Summary of response to issues raised	Respondent(s)
contribution sought. Further explanation should be provided as to where these potential qualifying developments are located, and why they are considered to qualify.	<p>existing land supply sites across the nine PfE authority areas that could potentially trigger the thresholds for a planning obligation towards Holcroft Moss.</p> <p>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 contribute 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.</p>	
The SPD is too complicated.	<p>The purpose of the SPD is to provide clear advice to developers as to what is expected in applications. It expands on provision within the PfE Plan to address a specific outcome of the Plan's HRA, namely the potential need to mitigate the impact of development elsewhere 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</p>	Christine Holt

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

Summary of main issues raised	Summary of response to issues raised	Respondent(s)
	<p>the impact of development elsewhere on Holcroft Moss within the Manchester Mosses SAC.</p> <p>No change is considered necessary.</p>	
<p>There should be more investment in the bus network to reduce air pollution.</p> <p>There should be other policies and actions such as the wider promotion of alternatives to car transport alongside the SPD.</p>	<p>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 HRA, relating to Holcroft Moss within the Manchester Mosses SAC.</p> <p>Measures exist elsewhere in the PfE 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.</p> <p>No change is considered necessary.</p>	<p>Ms Lawrence</p> <p>CPRE Lancashire, Liverpool City Region and Greater Manchester</p>
Concerns about over development in Salford	<p>The issues do not relate to the content and/or scope of the SPD.</p> <p>The SPD seeks to expand on provision within Policy JP-C8 of the PfE Plan to address a specific outcome of the Plan's HRA, relating to Holcroft Moss within the Manchester Mosses SAC. It does not promote development with Salford.</p> <p>No change is considered necessary.</p>	Alan Marland

Summary of main issues raised	Summary of response to issues raised	Respondent(s)
Concerns about building on green spaces, Green Belt and protected wildlife sites, including the Holcroft Moss site.	<p>The issues do not relate to the content and/or scope of the SPD.</p> <p>The SPD seeks to expand on provision within the PfE Plan to address a specific outcome of the Plan's HRA, 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.</p> <p>No change is considered necessary.</p>	<p>Jane Eberhart</p> <p>Christine Holt</p> <p>John Rowbotham</p> <p>Andrew Readwin</p> <p>Katherine Fieldsend</p>
No comments on the SPD.	Noted.	<p>Kirklees Council</p> <p>Historic England</p> <p>Canal and River Trust</p> <p>Coal Authority</p> <p>Sport England</p> <p>Manchester Airport Group</p>

