

SGMGB MIQ Response – Matter 1

Save Greater Manchester's Green Belt Group
Matter Number 1

Matter 1: Legal, Procedural and other General Matters

Public consultation

Q1.4. Is there any substantive evidence to indicate that any of the local planning authorities failed to comply with their SCI during the preparation of the Plan?

As mentioned in our response and those of our member organisations, we have real concerns about the lack of compliance with District SCIs. For more information, please refer to our member responses to this question, such as those provided by Friends of Carrington Moss, Bamford Green Belt Action Group and Bury Folk.

Word Count: 51

Sustainability appraisal

Question 1.5

Q1.5. Is there any substantive evidence to demonstrate that the sustainability appraisal failed to meet the relevant legal requirements?

We highlighted our concerns about the sustainability appraisal in our response (p16) and believe the Plan should be updated to ensure matters such as protection of green belt, landscape and wildlife are considered central to success.

Our key concern related to the very limited evaluation of the green belt, with no assessment criteria proposed to ensure this important land asset is protected. We expected, given the protections afforded within national and local planning policy, and the importance placed on its retention by GM communities, that the green belt would feature more prominently within the assessment.

As an example, the document does not sufficiently detail green belt land lost to development in the last 5-10 years, such that an assessment of the incremental loss of this resource can be fully understood. Nor does it address the impact on the rural economy, including the loss of bmv agricultural land, which will affect future food security.

In addition, neither the Plan nor the Scoping Report lists the importance of the green belt as a key principle/objective. As such, the green belt warrants its own specific assessment, including calculating the value of natural capital and what would be lost as a consequence of the planned release of 2,430 hectares of this land.

The [GM Strategic Options Consultation 2015](#) included a call for sites (paragraph 1.5). Within that document it clearly states (paragraph 3.37) "*Given the scale of growth outlined in the options this prioritisation may not prevent the need to release some areas of green belt for development.*" Of the three options listed, options 2 (p31) and 3 (p33) required release of green belt, and it was clear (paragraph 4.11) that the option 1 was not the preferred approach. Developers were, therefore, very aware that this plan was an opportunity to

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submit green belt sites for development. As a result, **only 11.5%** of the sites submitted were PDL and 59% were green field or green belt.

The GMCA appears to have started from a position that the release of green belt is a requirement, rather than considering its protection and retention is essential, with a genuine urban first approach to growth.

Such prioritisation would support and enable biodiversity enhancement. Given [GM's declaration of a biodiversity emergency](#), the Plan should make it clear that the destruction of wildlife will not be permitted, with extensive on-site mitigation required to address any potential detrimental impacts on important habitats.

In addition, our original response also drew attention to many inconsistencies in the evidence base, the numbers used, the time periods (for example for population projections). We believe the evidence base needs to be updated to ensure ease of understanding, transparency and consistency, along with using the latest and most relevant data.

Furthermore, having reviewed the submissions of our members (such as Save Royton's Green Belt - 1287136) and others (such as Steady State Manchester - 1297878), it is clear that there are widespread concerns that the Appraisal was not prepared with the objective of contributing to the achievement of sustainable development. This is evidenced by:

- The lack of reference to, or publication of, the objective calculation of carbon emissions data and/or estimates – the objectivity of the assessment must, therefore, be questioned.
- The GMCA's response to two FOI Requests asking for the carbon emissions data on which the appraisal was based, failed to refer to data sets with a breakdown of the carbon metric tons, nor method of calculation, and confirmed that this data was not in the Authority's possession.
- The failure to objectively demonstrate that the outcome of the appraisal is compatible with the GMCA's 2038 carbon budget.
- The failure to show the quantifiable basis for the GMCA's finding that the proposed policies are designed to secure that the development and use of land set out in the Plan contributes to the mitigation of, and adaptation to, climate change (in line with paragraph 1a of the Planning and Compulsory Purchase Act 2004) – given the lack of detailed carbon calculations, impact assessments and associated data.

Word Count: 666

Question 1.6

Q1.6. Did the sustainability appraisal consider and compare reasonable alternatives as the Plan evolved, including for the broad spatial distribution of housing, economic and other development?

The Integrated Assessment method was ineffective and opaque, with a matrix that fails to identify relevant criteria for several P4E objectives.

We particularly highlighted in our representation that the Scoping Report identified limited policy changes from earlier drafts. Such lack of active change in response to earlier representations and the feedback from GM communities (particularly in relation to the release of green belt) adds further weight to our concerns that the proposed release of green belt was intended.

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For the reasons laid out within our submission, and those of our member groups, an alternative spatial option should have been proposed that:

- (as suggested by Friends of Carrington Moss - 1287229), puts the climate emergency and nature's recovery at its heart, this is also emphasised in the GM Strategy
- maximises investment in, and delivery of, sustainable passenger and freight transport options
- does not require the release of green belt.

The lack of consideration and prioritisation of such a spatial option is not justified given each District, all Health Authorities and the GMCA all declared a climate emergency prior to the final submission of the Plan.

In addition, no scientific sources or objective evidence has been provided to explain how the matrix ratings were arrived at, meaning that the findings cannot be independently evaluated.

There has also been a failure to evaluate likely significant effects on environmental, economic and social factors using a (transparent and accessible) evidence base.

The Summary of the information within the Main Report (02.01.02) is not clear and accessible in showing the evidence-base which formed the process and basis of the appraisal's findings.

A review of the following example evidence material suggests that the current appraisal will not contribute to the achievement of sustainable development:

- [CPRE's position statement on green belt](#) which formed part of a House of Commons Research Briefing 29th October 2021
- [Natural England's climate change risk assessment and adaptation plan \(December 2021\)](#)
- [Why Tracking Adaptation Actions is Important – Tyndall Centre for Climate Change Research.](#)

Word Count: 329

Plan period

Q1.12. Is the plan period 2021 to 2037 justified, and will it provide an effective framework for local plans?

As chapter 5 of our submission highlights, there is a lack of clarity in relation to dates throughout the Plan, including references to associated policies such as the 2038 carbon neutral target and the Transport Strategy 2040, both key components of the Plan. Further clarity on aspects or Policies of the Plan that persist beyond 2037 is needed, especially in relation to the green belt allocations post-2037 (which appear to lack both evidence and scrutiny).

We have resisted a longer Plan Period given the way the term has been manipulated to maximise green belt release, with illogical proposals in previous iterations of the Plan suggesting:

- 2016 draft (20-year term 2015–2035) 60,000 homes on green belt
- 2019 draft (19-year term 2018–2037) 30,000 homes on green belt

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- 2020 draft (17-year term 2020–2037) 24,000 homes on green belt.

As highlighted by Save Royton's Greenbelt in its submission (ID:1287136, p28–36), the mismatched term of the Plan and the typical 15-year lifespan of the SHLAAs means land provision beyond the 15th year of the Plan is inaccurately assessed. GMCA has persisted in treating those land requirements beyond the 15th year as a shortfall, to defend green belt release. We do not believe this is justified, a deficit beyond the lifespan of the SHLAA is not the same as a shortfall during the assessment period.

Applying GMCA's logic, each year added to the end of the Plan would create an extra land requirement for approximately 10,000 homes. If this were accepted as sound reasoning for removing land from green belt, it would mean a plan-maker could prescribe the quantum of land they wish to remove by setting the term to achieve the desired outcome. This type of thinking inverts Government policy, negating the requirement (NPPF paragraphs 140 and 141) that green belt release should be comprehensively evidenced.

We recognise the formidable challenges that face GM are not well served by short-term thinking and that those Policies prevailing beyond 2037 are at risk of being undermined by uncertainty. Given NPPF paragraph 68 confirms there is no requirement to identify land supply for the whole Plan Period, a positively prepared Plan would minimise the loss of green belt and embed more long-term thinking into GM's environmental, economic and social policies.

With the above in mind, the Plan Period of 2021 to 2037 should be reconsidered, using up to date SHLAAs (NPPF paragraph 31), to ensure it provides an effective framework for local plans.

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Total Word Count: 1,455

Kind regards

Zoe Sherlock (Chair)

Save Greater Manchester's Green Belt