

## Matter 2: Amount of Land Needed for Housing, Office and Industrial/Warehousing Development

**Issue 2.1: Does the Plan set out a housing requirement figure for the Plan area that is justified and consistent with national policy?**

**Q2.1. Is the requirement to deliver a minimum of 164,800 net additional dwellings over the period 2021-2037 positively prepared, justified and consistent with national policy?**

Please see our responses in our representation (p21) and to MIQ 4.5.

We raised our concerns in relation to land supply throughout our original representation. There are issues of inconsistency (the requirement to deliver 164,800 homes, for example, yet the Scoping Report (p70) mentions 200,000). There is also no justification for the level of flexibility and over-provision being proposed. Given the GMCA considers there to be sufficient baseline land supply (paragraph 7.12), there are options (such as the inclusion of large/medium windfall sites) to meet the needs of GM without the requirement to release green belt. Furthermore, insufficient justification is made for the level and extent of green belt release and development on other protected land, which is inconsistent with national policy.

We believe GM benefits from extensive areas of derelict, vacant and underutilised land within the urban areas, and all tools should be used to encourage and promote redevelopment and housing delivery within those locations. This will provide sustainable growth, safe places for people to live and work and support the mitigation of climate change.

Factors which can be used to assist in the delivery of additional brownfield sites will include, for example, increased density, more effective use of space and increased height of development. To simply state that it is not viable to redevelop derelict sites is not sufficient to demonstrate that strategic exceptional circumstances exist to justify the extensive release of GM's green belt. We would, therefore, reiterate our request that urban sites be looked at once again, to ensure that all reasonable alternative options have been extensively evaluated.

NPPF paragraph 31 highlights the importance of "*relevant and up-to-date evidence*". With this in mind, we also believe it is imperative to consider up-to-date SHLAAs and the [2021 Census data](#) to significantly mitigate the need to release green belt.

Whilst we recognise the obligation to utilise the 2014 household projections to calculate LHN, we do not believe the requirement to deliver a minimum of 164,880 net additional dwellings (LHN) over the period 2021-2037 is positively prepared because the GMCA determine the anticipated population increase (158,200) via the [ONS 2018-based subnational population projections](#). This mismatch of datasets indicates that the GMCA recognises that household projections are no longer expected to reach the anomalous 2014 numbers.

Furthermore, the LHN figure is not justified given the indications (set out in the 2016 and 2018 ONS household projections, and now verified by the 2021 census data) that household projections are much lower than previously anticipated.

We believe that these factors trigger exceptional circumstances for deviating from the standard methodology as set out in NPPF paragraph 61 and that the Plan should be modified to accept the [ONS 2018-based household projections](#) to determine the minimum number of homes needed.

# SGMGB MIQ Response – Matter 2

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**Issue 2.2: Are the amounts of industrial and warehousing and office development that the Plan identifies as being required positively prepared, justified and consistent with national policy?**

## **Need for land for industrial and warehouse developments**

**Q2.2. Is the requirement to provide at least 3.33 million sqm of new, accessible industrial and warehousing floorspace in the Plan area over the period 2021-2037 positively prepared, justified and consistent with national policy?**

Please see our responses in our representation (p22, p58), MIQ 2.1 and MIQ 4.7.

Developments should meet the tests laid out within draft policy JP-J4. It is, therefore, imperative for them to be well located for access to sustainable modes of transport. This can only be achieved within the main urban areas and not by the release of green belt land or areas not well served by public transport links. It should be noted that many of the allocations only meet a small number of the site selection criteria, with only 3 of the employment allocations meeting criterion 1, and of these 3 allocations, only one has reasonable public transport connectivity.

Failure to ensure the proposed allocations meet with the requirements of draft policies would raise significant issues in relation to consistency and coherence, particularly as planning applications come forward.

There remains insufficient justification to propose the release of green belt sites to meet the development needs of the GMCA over the plan period. It is the view of the SGMGB that the Plan as drafted is not compliant with national policy and does not therefore pass the tests of soundness. The policy should therefore be amended to remove any proposed allocations from the green belt, and to refocus employment uses within the main urban areas.

**Word Count: 216**

## **Need for additional land for office developments**

**Q2.3. Is the requirement to provide at least 1.9 million sqm of new, accessible office floorspace in the Plan area over the period 2021-2037 positively prepared, justified and consistent with national policy?**

Please see our responses in our representation (p67) and MIQs 2.1 and 2.2 above.

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**Total Word Count: 686**

Kind regards

Zoe Sherlock (Chair)

Save Greater Manchester's Green Belt Group