

# SGMGB MIQ Response – Matter 3

Save Greater Manchester's Green Belt Group

Matter Number 3

## Matter 3: Spatial Strategy and Methodology for Selecting Site Allocations

**Issue 3.1: Does the Plan set out an appropriate spatial strategy, taking into account reasonable alternatives?**

### Spatial strategy

**Q3.1. Is the overall spatial strategy aimed at achieving core growth and inner area regeneration, boosting northern competitiveness, and sustaining southern competitiveness an appropriate strategy, taking into account reasonable alternatives?**

As we set out in our response (p24), it is of significance that, within the Growth and Spatial Options report, it is made clear that options could be brought forward which include no green belt release. This does not suggest the aims of achieving core growth, inner area regeneration, increased northern competitiveness and sustained southern prosperity could not be part of that alternative option but these aims would be tempered by the desire to achieve additional objectives (such as no release of green belt, maximising the mitigation of climate change and accelerating nature's recovery).

The Spatial Strategy appears to be framed in purely economic terms, yet the NPPF requires environmental and social goals to be considered to meet sustainability expectations. We believe more focus should have been given to the climate and biodiversity emergencies, the preservation of green spaces and the importance of the rural economy.

**Word Count: 146**

### Housing distribution (Table 7.2)

**Q3.2. Is the proposed distribution of housing development between districts (2021-2037) in Table 7.2 based on adequate and proportionate evidence?**

In order to determine the distribution of housing development additional evidence is needed, such as up to date SHLAAs, the expected large and medium windfall figures and the potential for the oversupply of Office floorspace to contribute to housing supply.

We note that GMCA responses to Planning Inspector questions suggest that the Plan should be considered as a whole. With this in mind, we believe a Regional approach should be taken to, for example, the inclusion of large/medium windfall in the land supply figures to ensure the numbers represent a realistic picture of existing supply.

**Word Count: 95**

### Housing distribution and spatial strategy

**Q3.3. Is the proposed distribution of housing development between districts (2021 to 2037) in Table 7.2 consistent with the spatial strategy summarised in Figure 4.1 and paragraphs 4.17 to 4.19 and detailed in policies JP-Strat1 to JP-Strat11? In particular:**

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- a) Will the minimum housing requirement figures in Table 7.2 for Manchester, Salford and Trafford collectively help to deliver core growth and inner area regeneration?
- b) Will the minimum housing requirement figures in Table 7.2 for Manchester and Trafford collectively help to sustain southern competitiveness?
- c) Will the minimum housing requirement figures in Table 7.2 for Bolton, Bury, Oldham, Rochdale, Salford, Tameside and Wigan collectively help to boost northern competitiveness?

See our response to MIQ 3.2 above.

**Word Count: 7**

### Housing distribution and housing market areas

**Q3.4. Would the proposed distribution of housing development help to ensure that sufficient land will be available in the right places to meet the housing needs of present and future generations?**

As stated in our response to MIQ 3.2, above, further evidence is needed.

**Word Count: 13**

**Issue 3.2 Were the allocations in the Plan selected using an appropriate methodology based on proportionate evidence?**

### Housing allocations

**Q3.5. Were the housing allocations in the Plan (including the relevant parts of mixed use allocations) selected using an appropriate methodology based on proportionate evidence?**

Please see our representation (p21), which highlights our concern that the site selection criteria report does not appear to include any assessment of urban sites. This would indicate an initial bias towards the release of green belt in preference to the re-use/regeneration of brownfield and urban sites. This approach does not reflect the wording at the outset of the Plan and is clearly not compliant with national guidance.

It is the view of the SGMGB that, whilst the Plan sets out a brownfield preference policy, the site assessment process fails to follow this approach and support its delivery. As there was an early expectation of green belt release, there has been a focus on such sites since Plan conception, with no incentives to propose brownfield land for inclusion in the Plan. The preference for Large Sites (whilst done in accordance with NPPF para 73) resulted in an immediate bias in favour of the submission of green belt (as brownfield sites tend to be smaller), which directly contradicted the stated PFE policy of preference for brownfield.

Confining search areas to Broad Areas of Search meant any site (even if sustainable, suitable and previously developed) was excluded at an early stage.

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We believe 'challenging' sites, such as those that are contaminated, should be fully explored, especially given brownfield and levelling up funding, rather than leaving such issues to future generations to resolve.

We do not believe that all reasonable alternatives were considered to minimise the impact on green belt. We would reiterate our proposal that further assessment should be undertaken of all land parcels within built up areas to assess the potential for enhanced densities and for these sites to come forward in advance of the release of precious greenspaces which will be forever lost to future generations.

In addition, whilst p5 of the Site Selection Background Paper highlighted the national policies that apply to site selection, NPPF paragraph 21 highlights that strategic policies should be limited to those “*necessary to address the strategic priorities*”, including (paragraph 23) “*planning for and allocating sufficient sites to deliver the strategic priorities*”. As GM’s strategic priorities are set out in the GM Strategy (including addressing the climate emergency and inequalities), they should have been the focus of the site selection criteria.

NPPF paragraph 141 states that, before concluding exceptional circumstances exist to justify changes to greenbelt boundaries, a policy-making authority “*should be able to demonstrate that it has examined fully all the other reasonable options*”. Yet the site selection process does not ensure all those alternatives have been considered.

Whilst NPPF paragraph 73 suggests that “*planning for larger scale development*” can achieve the supply of large numbers of new homes, the evidence suggests that this is unnecessary. This paragraph goes on to mention that such settlements should be well located and supported by a genuine choice of transport modes. This has not been realised by the site selection methodology. This paragraph also suggests that such discussions should be done with the “*support of their communities*”, when, in fact, for GM there has been no active engagement with local communities in the development of either the criteria or the identification of suitable locations. As a consequence, the selected Allocations will not support “*sustainable communities*”.

**Word Count: 538**

### **Q3.6. Are the locations of the housing allocations in the Plan (including the relevant parts of mixed use allocations) consistent with the spatial strategy summarised in Figure 4.1 and detailed in policies JP-Strat1 to JP-Strat11?**

Please see our representation (p50), which highlights our concern that these policies propose sites in unsustainable locations, with poor access to local transport, at risk from flooding and with no inter-connectivity between homes and employment opportunities.

We also highlight (eg paragraph 6.55) that some aspects of the policies are ambiguous and need strengthening to ensure what is delivered meets expectations.

**Word Count: 60**

### **Employment allocations**

### **Q3.7. Were the employment allocations in the Plan (including the relevant parts of mixed-use allocations) selected using an appropriate methodology based on proportionate evidence<sup>34</sup>?**

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Please see our representation (p30, p56). We do not believe the methodology for selecting employment locations was appropriate given that the majority of sites are on green belt and in unsustainable locations. Further work should be undertaken to identify alternatives, such as utilising the oversupply of Office floorspace, to minimise the use of green belt.

**Word Count: 55**

**Q3.8. Are the locations of the employment allocations in the Plan (including the relevant parts of mixed-use allocations) consistent with the spatial strategy summarised in Figure 4.1 and detailed in policies JP-Strat1 to JP-Strat11?**

Please see our response to question 3.6.

**Word Count: 7**

**Issue 3.3 Are the allocations in the Plan based on proportionate and adequate evidence about the impacts on the strategic road network?**

**Q3.9. Are the allocations in the Plan based on proportionate and adequate evidence about the impacts on the strategic road network?**

As mentioned in earlier responses, given many of the allocations are sited in unsustainable locations and are heavily reliant on highways improvements, including the strategic road network, we do not believe sufficient focus or evidence has been given to this topic.

There is very limited information in the documentation to date, and the report from National Highways has not yet been added to the evidence database. Without access to this document, we cannot determine whether it constitutes proportionate and adequate evidence about the impact on the SRN.

**Word Count:87**

**Q3.10. Is there substantive evidence to indicate that the development proposed in the Plan, in combination with other committed and planned development, would have an unacceptable impact on highway safety or that the residual cumulative impacts on the road network would be severe? In particular:**

**a) Could any significant impacts on the transport network (in terms of capacity and congestion), or on highway safety, be cost effectively mitigated to an acceptable degree?**

**b) Does the Plan include effective policies to secure the necessary mitigations?**

Given many of the transport proposals are not commitments and are subject to business cases and developer contributions, we believe the proposals in the Plan will lead to an unacceptable impact on the road network. As the Policies do not include costed proposals, they are not an effective means of securing the necessary mitigations.

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**Word Count: 54**

## **Addendum**

### **Matter 3: Spatial strategy and methodology for selecting site allocations**

**Issue 3.4 Do the allocations in the Plan take appropriate account of the presence of minerals and minerals infrastructure?**

**Q3.11 Do the allocations in the Plan take appropriate account of the presence of minerals and minerals infrastructure? In particular:**

- a) Was the presence of minerals and minerals infrastructure adequately taken into account when deciding which sites to allocate in the Plan?**

There is nothing in the spatial options or the site selection framework to discourage selection of sites where there is a presence of minerals, including irreplaceable habitats.

- b) Are any of the allocations within minerals safeguarding areas designated in the adopted Greater Manchester Joint Minerals Development Plan Document or other relevant development plan document?**

As highlighted in the Appendices to our representation, a number of the allocations are sited in Mineral Safeguarding areas.

**c) Are the policies relating to allocations in the Plan consistent with policies in the adopted Greater Manchester Joint Minerals Development Plan Document and any other relevant minerals and minerals infrastructure policies in other adopted development plan document?**

It should be noted that the GM Joint Minerals Development Plan is now almost 10 years old. It does not reflect the declarations of a climate emergency made by all the Authorities and, as such, does not afford appropriate protection to peat deposits, which are now recognised as a key climate mitigation tool.

**Word Count: 107**

**Total Word Count: 1,169**

Kind regards

Zoe Sherlock (Chair)

Save Greater Manchester's Green Belt Group