

SGMGB MIQ Response – Matter 4

Save Greater Manchester's Green Belt Group Matter Number 4

Matter 4: Green Belt

Issue 4.1 Were all reasonable options for meeting the identified need for housing and employment development on land that is not in the Green Belt fully examined?

Land within existing urban areas

Q4.1. Were all reasonable opportunities for meeting the need for (a) housing and (b) industrial and warehousing development within the existing urban areas fully examined, including through making as much use as possible of suitable brownfield sites and underutilised land and optimising the density of development?

We highlight our concerns about green belt release throughout our original representation.

Document 07.01.25 states (p53, para 1.3) that the case for exceptional circumstances has included consideration of “*other reasonable alternatives*”, yet document 02.01.10 highlighted two spatial options (Urban Max, p37 and Public Transport Max, p38) neither of which required green belt release.

In assessing the options, the document (02.01.10) shows how each option supports to the Plan Objectives. For Public Transport Max (p52) the assessment against the Resilience Objective states “*This option could lead to an over-capacity of the sustainable transport network in the urban area, which in turn might increase car travel as an alternative making it more difficult to achieve a carbon neutral city-region.*” An unbelievable suggestion. If there was a danger of the sustainable transport network being found to be over-capacity, more capacity would be generated!

It seems as though spatial options that would not require the release of green belt were unreasonably excluded. With this in mind, we do not believe the alternatives were robustly evaluated.

Word Count: 171

Issue 4.2 Is removing land from the Green Belt as proposed in the Plan necessary to ensure that the identified need for housing and employment development can be met in a way that promotes sustainable patterns of development?

Sustainable patterns of development

Q4.4. In selecting the allocations that are removed from the Green Belt, was first consideration given to land which has been previously developed and/or is well served by public transport?

It is important to identify and promote development in sustainable and suitable locations with good access to public services, facilities and public transport links. As we set out in section 7

SGMGB MIQ Response – Matter 4

of our original representation, it is clear that a number of sites being proposed for development do not meet these requirements and should not be deemed appropriate.

Word Count: 58

Removing land from the Green Belt to provide land for housing development

Question 4.5

Q4.5. Is there a quantitative need to remove land from the Green Belt in the Plan area to ensure the provision of at least 164,880 net additional homes in the period 2021 to 2037?

Please see our response in our original representation (p58) and MIQ 2.1.

We do not believe the Policy, indicates the need to release green belt. Attention is drawn to paragraph 7.12 which makes it clear that the nine boroughs have sufficient sites to meet the identified housing needs. In our view the level of existing land supply does not justify the proposed release of green belt.

We believe further evidence should be made available, including:

- up to date SHLAAs
- calculations for potential windfall sites
- the potential for the oversupply of office floorspace to be taken into consideration
- confirmation of expected housing densities in urban areas.

Word Count: 105

Question 4.6

Q4.6. Is there a need to remove land from the Green Belt in each of the seven districts to ensure that the identified need for new homes can be met in accordance with the Plan's spatial strategy? In particular, is there a need to remove land from the Green Belt in Salford and Wigan to meet housing needs?

We believe the current spatial strategy is flawed as the levels of growth are unjustified. An alternative option which does not require the release of green belt should have been prioritised. Given that GM has sufficient land supply to meet the requirements of the Government's housing need methodology, we do not believe there is a need to remove land from the green belt in any of the GM districts.

We recognise that GM's green belt functions at three levels: regional (preventing GM from merging with other counties), city and borough (preventing districts from merging into each other) and town level (preventing the smaller towns and villages that make up the boroughs from merging into each other).

The Plan appears to assign far less importance to the green belt that separates the boroughs and towns than to the green belt which encases GM and seems to consider the merger of neighbouring boroughs and towns a design feature!

SGMGB MIQ Response – Matter 4

It should be noted that the release of green belt was fundamentally and overwhelmingly rejected by most respondents to the 2019 consultation.

Word Count: 178

Removing land from the Green Belt to make employment allocations

Q4.7. Is there a need to remove land from the Green Belt to ensure that the identified need for additional industrial and warehousing floorspace can be met between 2021 and 2037?

Please see our responses in our representation (p58) and MIQ 2.2.

Industrial and warehousing land supply equates to a 56% buffer in total. Earlier reports included in the GMSF documentation noted that a “*supply margin of 50% falls well outside the bounds of what has been generally used elsewhere*” (Note on Employment Land Needs for Greater Manchester”, Nicol Economics, February 2020, p. 28). Nicol Economics further notes that supply margins are “*up to around 25% or at most 5 years of supply*”.

As we stated in our original response, whilst there is a shortfall of industrial and warehousing land, there is oversupply of office floorspace. Given that the provisions of the new E Class provide sufficient flexibility to move between commercial uses without the need for planning permission, it can be argued that the real shortfall in provision is very limited, and further assessment should in fact be undertaken. There remains insufficient justification to propose the release of green belt sites to meet the development needs of the GMCA over the plan period.

Word Count: 173

Q4.8. Will the employment allocations removed from the Green Belt promote sustainable patterns of development?

As set out in Section 7 of our response, many of the proposed allocations are not in sustainable locations and do not have transport commitments to make them sustainable. This is borne out by the responses to the Site Selection criteria and also in the GMCA responses to the Planning Inspectors' questions.

The lack of sustainable passenger and freight transport options will lead to significant increases in air, noise and light pollution and carbon emissions.

The Plan suggests all I&W sites should be focused near GM's transport assets (see Point C - Policy JP-J 1). Yet, other than driving up the volume of traffic on the strategic road network, utilisation of these key assets has not been maximised.

We believe the destruction of irreplaceable habitats, the loss of best and most versatile farmland, the impact on climate mitigation opportunities (such as the loss of extensive wetland which currently soaks up local flooding), along with the lack of sustainable passenger and freight transport options means employment development on green belt certainly cannot be described as promoting “*sustainable patterns of development*”.

Word Count: 179

SGMGB MIQ Response – Matter 4

Total Word Count: 864

Kind regards

Zoe Sherlock (Chair)

Save Greater Manchester's Green Belt Group