

15<sup>th</sup> March 2023

Dear Mr Fieldhouse, Ms Gibbons and Mr Lee

Thank you for changing the agenda of the Hearings to provide an opportunity to raise our questions and concerns about the GMCA's revised approach to Green Belt additions. We thought it may be helpful to share the key issues raised by our members in advance of the session on 28<sup>th</sup> March:

1. The GMCA's withdrawal of its support for 32 of the proposed Green Belt additions appears to have arisen due to the Solihull vs Gallagher appeal judgement from 2014, a case which the GMCA's legal representative was heavily involved in. It is not clear to us why the GMCA concluded that these Green Belt additions met the legal threshold in 2021, when the decision was made to progress to the regulation 19 consultation, and they presumably still held this view when the Plan was submitted for Examination. Our members request that the Inspectors seek clarification from GMCA on this point and that the reasons behind this change of opinion at this late stage are published, ideally prior to 28<sup>th</sup> March.
2. The Gunning Principles are established by case law and require that consultation includes sufficient (and accurate) information to enable consultees to give intelligent consideration and provide an informed response. Given that around 27,000 GM residents objected to the release of Green Belt and that these additions were a key compensatory measure for the losses proposed, it is clear that there would have been significant feedback, had they been withdrawn prior to the regulation 19 consultation. We request that you consider whether this a justifiable modification to the Plan at this late stage?
3. These Green Belt additions represent a significant component of the submitted Plan, so procedural questions have also been raised following this proposed radical change. Should **all** the Green Belt additions be fully examined as submitted (as was the case with the Walshaw Allocation, which was proposed for removal)? We would welcome the Inspector's guidance and feedback on this matter.
4. There are significant concerns that such a huge modification of the Plan has been introduced, in a Hearing Session (with no prior notification), giving limited opportunity for those not attending to contribute to the subsequent discussion. Many of our members work full time and are not able to attend additional Hearings at short notice. Would the Inspectors accept written submissions from anyone unable to attend but who wishes to provide input?

We appreciate that the proposed modifications are precisely that, and that they may yet be rejected if they do not contribute to making the Plan sound. Our members have, however, raised the following points that are not specific to the major modification above and, given the vast number of substantial changes now proposed, question whether the Plan was actually ready for submission to the Planning Inspectorate:

5. During many of the Hearing Sessions, the GMCA has introduced significant policy changes, materially altering the Plan, and weakening the policies in the consulted version. We question whether these are necessary to make the Plan sound, including those relating to changes in affordable housing policy, a loss of focus on Brownfield Preference, district level employment targets and the significant weakening of JP-S2, along with the policies that are proposed to be deleted entirely.
6. Most of these modifications were proposed shortly before the relevant Hearing Sessions (for example, the proposal for the district-level employment targets was published on the day before the Hearing). These short notice changes meant Hearing attendees did not have adequate time to review the proposals in detail and formulate a considered response and other potentially interested Examination participants had even more limited opportunities to contribute to the subsequent discussions.

7. Much time has been taken up in the Hearings by editorial/textual changes proposed by the GMCA, some of which we feel have little-to-no bearing on the soundness of the Plan. We believe these changes are unreasonable and the approach is inconsistent, given that the GMCA has suggested that points raised by others should not be considered on the basis that such changes are not necessary to make the Plan sound?

Given the excessive number and impact of the proposed changes, we request that the Inspectors consider removing all proposals for Green Belt change (Allocations and Additions). Alternatively, we feel the Plan should be resubmitted for consultation at the Regulation 19 stage, so communities and other stakeholders have the opportunity to comment on what is now intended.

Yours sincerely,

Zoe Sherlock (Chair)

Save Greater Manchester's Green Belt Group

Mark Burton

Steady State Manchester