

## Save Greater Manchester's Green Belt Group Response

Response to Lords Built Environment Committee

Inquiry: The impact of environmental regulations on development

We have focused our response on our experience from the recent Examination in Public of the Greater Manchester Combined Authority's (GMCA's) Places for Everyone (P4E) Spatial Plan<sup>1</sup>.

[Official data](#)<sup>2</sup> tells us that since 2013/14 England has lost over **25,110 hectares of Green Belt** (nearly 100 square miles), equivalent to over 35,000 football pitches of highly valued land, with various natural capital and ecosystem services attributes and community health and wellbeing benefits, that are now forever lost to future generations. We believe environmental regulations need to be strengthened to prevent further losses and give a number of examples in our responses below.

The members of [Save Greater Manchester's Green Belt](#) (SGMGB) group<sup>3</sup> (around 40 community groups in the Greater Manchester area), [Steady State Manchester](#)<sup>4</sup> and other communities remain highly disturbed by the Plan to **prematurely and unnecessarily** release **2,430** hectares of Green Belt (comparable to over 3,400 football pitches and almost 10% of the total loss since 2013), despite around **27,000** Greater Manchester (GM) constituents objecting to Green Belt release in consultations about the Plan.

Whilst we understand GM's aspirations for growth, these aims should lead to sustainable development, which positively (rather than negatively) impacts the environment. Yet, P4E has no assessment of the impact on rural communities and nothing on natural capital to ensure the 'value' of the existing ecosystem services is fully recognised and taken into consideration. In fact, as we mention below, there is not even an assessment of the carbon implications of this Plan.

These omissions are entirely due to the lack of clarity and absence of data requirements in the environmental and planning regulations.

It is clear that GM **does** have alternatives to building on Green Belt, but, for example, the potential to convert the 1.3million m<sup>2</sup> of excess office floorspace, much of which is in sustainable locations, appears to have been ignored. In fact, despite historical trends, there has been no consideration of potential large/medium windfall sites within the GMCA's figures, although they do confirm that *"there is clear evidence to demonstrate that such sites have come forward in the past and no reason to believe that this will not continue to be the case"*.

This is a huge, missed opportunity, one that can only be addressed with access to appropriate levels of high-quality information from a variety of sources, genuinely assessing the planning balance and understanding whether the public interest test<sup>5</sup> has been met. We are keen to see "levelling up" across GM, but, in P4E, the focus and the funding is on bringing forward sites in the Green Belt, rather than on tackling the blight of brownfield and proposing truly sustainable development.

We set out our concerns in response to the questions below.

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<sup>1</sup> <https://www.greatermanchester-ca.gov.uk/what-we-do/planning-and-housing/places-for-everyone/submission-documents/>

<sup>2</sup> [Local authority green belt statistics for England: 2020-21 - statistical release - GOV.UK \(www.gov.uk\)](#)

<sup>3</sup> <http://savegmgreenbelt.org.uk/>

<sup>4</sup> <https://steadystatemanchester.net/>

<sup>5</sup> <https://friendsofcarringtonmoss.com/2023/03/12/new-carrington-and-the-public-interest-test/>

## Questions:

### **What environmental regulations need to be considered when undertaking development?**

It seems only the National Planning Policy Framework (NPPF) and associated Planning Practice Guidance (PPG), along with the Climate Change Act 2008 (CC Act) need to be taken into consideration when plan-making or decision-taking (planning application submissions).

### **When during the development process are they most likely to be encountered?**

The above-mentioned regulations (NPPF, PPG and CC Act) are considered during both plan-making and decision-taking (planning application submissions).

### **What is the single biggest challenge for developers and promoters in fulfilling environmental requirements? How could this be resolved?**

N/a

### **Are changes in environmental regulations governing development clearly communicated?**

Residents are not well-informed about changes. Organisations like Save Greater Manchester's Green Belt Group can be used as a conduit to citizens to inform them of changes in environmental regulations.

### **Is sufficient support available to help developers and promoters fulfil their responsibilities? What are the costs of meeting environmental regulations for developers? How does this vary for types of developer or promoter and in different locations?**

N/a

### **Is there sufficient coherence between different environmental regulations?**

It is clear that the lack of coherence between different environmental regulations is facilitating the approval of unsustainable plans and planning applications. There is a huge disconnect between planning regulations, environmental aspirations and other Government expectations around sustainability.

In Greater Manchester, for example, many housing and employment developments are sited in unsustainable locations. Over 20 of the 34 Green Belt sites in the Plan are not well served by public transport. A number of the sites propose development on irreplaceable habitats (peat moss), best and most versatile agricultural land, locations that have significant levels of regular surface water flooding, and many will have a huge impact on the local rural economy.

GM's plans do not prioritise sustainable freight transport, despite the disproportionate focus on warehousing development and the contrasting aim of GM's Transport Strategy to ensure there will be "*zero net growth in motor vehicle traffic in Greater Manchester between 2017 and 2040*".

There is also insufficient focus on health services (which are already overstretched across the sub-region). There is, for example, no land proposed in the Plan for a new hospital to serve the anticipated additional 400,000 additional residents and other health facilities are not confirmed, which could increase travel for patients. School places are already a strategic red risk in some Authorities and bring many challenges to existing residents, with parents being forced to drive their children to schools outside of their locality, again significantly increasing traffic and congestion.

Clearly, given the above, the environmental impacts of this Plan not only affect the area being built upon, but also a much wider area surrounding that development. The environmental regulations need to be updated to address this.

### **How could regulations be administered in a more systematic and coherent way?**

The Government could appoint an Environmental Advocate at national, regional and local levels, to support the understanding and implementation of planning regulations relating to the environment. This would ensure the right information is available to those who need to provide supporting data and that advice and guidance is available on best practice and templates/tools to aid the production of what is required.

In addition, each time the Government produces a strategy, policy or principles document, the potential impact on planning should be considered and the National Planning Policy Framework should be updated accordingly, within 3 months of the new guidance being issued.

### **What impact do Government bodies such as the Environment Agency and Natural England have on planning and development decisions?**

Our experience is that Natural England has little impact on planning and development decisions.

Natural England has, for example, provided guidance to the P4E Examination Hearings, reiterating their lack of support for development on peatlands, several of which have been proposed for Allocation (homes and warehousing). The GMCA believes Natural England's advice does not amount to a "soundness" issue, so the guidance will not be followed. This is despite the GMCA themselves describing our peat mosses as supporting "*a unique range of wildlife*" and stating that "*lowland raised bog is now one of Western Europe's rarest and most threatened habitats*".

**How effectively do these bodies work together? How does the Environment Agency interact with development as both regulator and owner of land and other assets? What role does Natural England play in monitoring and implementing these regulations?**

N/a

### **How does Natural England's involvement affect the delivery of new development?**

As set out in the example above, not at all!

### **To what extent are the information needs of the planning system proportionate?**

There is a huge lack of balance in relation to the information needs of the planning system when comparing requirements for environmental data to, for example, facts and figures relating to housing and employment needs.

Greater use should be made of readily available data to determine development need, such as that set out in the recent [State of Brownfield<sup>6</sup>](#) report from CPRE. The report highlights the national number of sites (23,002), the number of hectares (27,342) and the potential number of housing units (1,232,592). All have increased from previous years' figures.

Some topic areas require new data collection/analysis to support planning or development decisions. Despite proposing to remove 2,430 hectares of Green Belt in the P4E Spatial Plan, for example, little ecological evidence has been presented, nothing on natural capital and no assessment of the impact on the rural economy (much of the Green Belt land is best and most versatile agricultural land).

At the decision-making stage, the regulations are equally inadequate in relation to environmental information needs. There is no requirement for any assessment of the natural capital of the site to be confirmed, for example, along with the associated value of the ecosystem services provided, nor for an assessment of the impact of the development on those assets.

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<sup>6</sup> <https://www.cpre.org.uk/wp-content/uploads/2022/12/State-of-Brownfield-2022-FINAL-FORMATTED-15-12-2022.pdf>

Using P4E as an example, the excessive growth set out in the Plan will cause significant additional carbon emissions that will make it difficult for GM to stay within its stated carbon budget and meet its carbon target, including its aspiration for carbon neutrality by 2038. Yet, the GMCA did not produce any quantitative assessment of the implications of their proposals, and suggested, at the P4E Examination, that it was reasonable for them not to provide such data.

Communities highlighted the approach taken in the [Greater Cambridge Plan](#)<sup>7</sup>, an Authority which **did** conduct quantitative modelling of the carbon impact of their different spatial options. This Authority was dismissed as an outlier, rather than heralded as setting a standard that other plans should be following. We strongly believe that, as a minimum, the Cambridge example should become a requirement within the regulations.

In the absence of any assessment by the GMCA, Steady State Manchester has analysed the data and has produced a report which sets out the [Carbon Implications of Places for Everyone](#)<sup>8</sup>, showing that the 2038 carbon neutrality objective is unlikely to be met. This analysis (along with the Cambridge example) demonstrates that it is possible to produce more detailed information to enable a level of scrutiny on the impact of such plans.

During the P4E Examination, and at a time when decarbonisation should be top of the agenda, the GMCA backtracked on a number of policies (net zero buildings is now proposed to be something to be worked towards, rather than mandated, and will be subject to financial viability, the 'get out of jail card' used by developers to avoid planning policy obligations). In addition, the weakening of the brownfield first policy could result in greater Green Belt release, with the associated environmental impacts. Yet, there is currently no requirement in the regulations for an assessment to be undertaken to demonstrate how these major changes will affect various aspects of the Plan, including GM's carbon emissions.

The regulations should be updated to require more detailed analysis to be carried out to assess need and to clearly understand the impacts of a plan (or a planning application) on the environment. This should include (but is not limited to), at the plan-making stage, analysis of available housing and employment land (with inputs from the community), clarity about the level of growth being proposed, what that means in terms of increased population (residents and employees) and the associated services (schools, health, etc), together with the required transport infrastructure (including transparency about the level of investment needed). In addition, provision of data that highlights the environmental assets, ecology and biodiversity, natural capital, climate mitigation and health and wellbeing, and how they will be affected, should also be mandated.

Where data is readily available to determine the validity of an approach (or otherwise), it should be reviewed, analysed and published as part of the plan-making process.

As an example, we are able to see from the publication of the 2021 Census data that our concerns about GM's proposed level of growth are justified. It is not a lack of market housing supply that is causing the current crisis (emphasis should be on the lack of genuinely affordable homes). In fact, more houses are being built than households formed. This is true for all Regions, [as highlighted by Positive Money](#)<sup>9</sup>, a not-for-profit research and campaigning organisation based in London, which reveals that "*in 2021 there were 1.4 million more dwellings than households in England*".

[Local SGMGB analysis](#)<sup>10</sup> utilised Census and ONS data to highlight that the number of new homes built in GM between 2011 and 2021 far exceeds the number of households formed during that period, with almost **28,000** completed dwellings not contributing to household formation. This figure would grow substantially if the number of empty homes brought back into use during the period (14,000) was included.

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<sup>7</sup> [Greater Cambridge Plan](#)

<sup>8</sup> <https://steadystatemanchester.files.wordpress.com/2023/01/p4e-carbon-impact-report-draft-v4.0.pdf>

<sup>9</sup> <https://positivemoney.org/2023/01/more-than-building-new-houses/>

<sup>10</sup> <https://friendsofcarringtonmoss.com/2022/07/15/is-green-belt-release-in-gm-premature-the-latest-census-data-suggests-it-is/>

That SGMGB analysis also revealed that 50,000 fewer households formed (in the period to 2021) than the number generated using the Government's 2014-based formula (suggesting that this method of calculating housing need significantly over-estimates requirements). P4E confirms that GM has sufficient existing housing land supply, **without** releasing Green Belt, to **exceed** the Government's overstated calculation, and that existing land supply is sufficient to meet the needs of an additional population of circa 400,000 people, **the equivalent of two new boroughs in GM.**

Employment land provision is also vastly over-stated (Green Belt release results in a totally unjustifiable **75% buffer**) and is focused on warehousing (which is neither highly paid, nor does it support high staffing numbers). GM's own expert advisor highlighted that the employment land uplift (of 31% prior to the release of Green Belt) represented "*the upper-end of margins*". The consultant also observed that "*a supply margin of 50% falls well outside the bounds of what has been generally used elsewhere*".

The environmental implications of this overdevelopment were **NOT** set out in the P4E Plan and the regulations should be updated to ensure that such an assessment is clearly available. Despite the CPRE Brownfield report, mentioned above, singling out the Northwest and Manchester as places with high brownfield capacity, P4E will release Green Belt immediately following Plan approval, unnecessarily destroying our environmental assets, rather than prioritising the reuse of previously developed land. This will have a major effect on local environments and local communities. Yet, brownfield blight will not be addressed, available sites will remain wasteland, and additional brownfield sites will come forward during the Plan period.

The Greater Manchester Strategy highlights that "*Climate change is the single biggest threat that we face*", yet the P4E Spatial Plan, is able to propose excessive and unnecessary growth, **without** demonstrating the impact on environmental assets. GM's leaders are, therefore, supporting a Plan that will increase carbon emissions, increase air, noise and light pollution, and increase the potential for localised flooding – and all considered to be meeting the required environmental regulations for planning!

If our politicians are prepared to make such a decision, they should be prepared to be totally honest and transparent about it and to share the detailed data which sets out the implications for our environment as a consequence of that decision. The regulations do not currently require that such information is provided. This should be changed.

### **How far do the key actors in implementing environmental regulations have sufficient resources to carry out their responsibilities?**

We recognise that Local Planning Authorities have very limited resources and, on occasion, find it very challenging to monitor delivery of planning obligations, including those relating to the environment.

Communities are an important, unpaid asset, often monitoring and reporting environmental aspects, providing time and talent to help protect the climate and the environment.

The proposed changes set out in the NPPF consultation, recognising communities as key stakeholders in the planning process, are very welcome. Our responses have stressed the need for a more transparently sustainable approach, one which gives equal weight to the environmental and social objectives as that given to economic benefits.

### **Are there further significant changes which would improve this system?**

Despite the focus on "sustainable" development within the NPPF, climate and environmental impacts **do not** carry the same weight as economic growth. The "*presumption in favour of sustainable development*" (paragraph 11) suggests that there is a need to "*align growth and infrastructure*". Yet plans for growth can be approved without any confirmation of infrastructure funding being available. The paragraph goes on to suggest that the plan should improve the environment and mitigate climate change, yet no evidence is needed to demonstrate that these requirements will be met.

The guidance should be updated to explicitly define what is actually meant by the term “*sustainable development*”. Allocating land for multiple warehouses but not planning for any sustainable freight transport options is not a sustainable solution, particularly when the current use of that area is peat moss, Grade 2 best and most versatile agricultural land, woodland and wetland habitats.

Once land is “allocated” in a plan, the lack of infrastructure investment does not prevent planning applications from coming forward, leading to (in this example) huge issues with air, noise and light pollution, carbon emissions and health and wellbeing for local residents, along with the devastating impact on the ecology and biodiversity of the area.

As we highlight in this document, more (and more detailed) data which assesses the environmental implications of development is needed to ensure sustainability is actually achieved.

Ensuring clear definitions throughout the NPPF would support improving the system. As an example, (paragraph 174) “*Planning policies and decisions should contribute to and enhance the natural and local environment by .....*”. There are numerous examples of this (and other paragraphs in the NPPF) being ignored as economic growth is considered to be more important than nature’s recovery. Valued landscapes, for example, are not protected or enhanced, they are destroyed by warehousing (despite the abundance of brownfield land, often in more sustainable locations).

In order to understand the impact on ecology, biodiversity and our natural capital, a baseline should be created and development should be required to explicitly demonstrate how it will protect and enhance those assets.

As an example, the P4E Plan will:

- remove swathes of best and most versatile agricultural land (which should be retained for future generations and used for sustainable food production)
- impact GM’s ability to address the climate emergency (with many chosen sites subject to regular and extensive surface water flooding)
- lead to unjustified and irreversible harm to the environment, impacting nature’s recovery, with irreplaceable habitats (peat mosses) and sites of biological importance scheduled to be destroyed
- eradicate populations of red listed birds and endangered/protected species
- significantly impact the physical and mental health and wellbeing of GM residents.

We believe environmental regulations need to be strengthened significantly to prevent further environmental losses and to support nature’s recovery.