

Save Greater Manchester's Green Belt Group Response

The [Save Greater Manchester's Green Belt](http://savegmgreenbelt.org.uk/) (SGMGB) group¹ comprises around 40 community groups spread across the Greater Manchester (GM) area. We were formed back in 2016 when around **27,000** GM constituents objected to the proposals for extensive Green Belt release in consultations about the Greater Manchester Combined Authority's Places for Everyone (P4E) Spatial Plan².

Many of our objections related to the enormous impact on the health and wellbeing of humans, wildlife and nature, including that caused by the loss of important habitats, by development, and by air, noise, light and vibration pollution.

We work with other local groups, such as [Steady State Manchester](https://steadystatemanchester.net/)³, which has, among many other things, assessed the carbon implications of P4E⁴.

The Spatial Plan mentioned above allocates 2,430 hectares of Green Belt land rather than prioritising brownfield regeneration. This includes peat mosses, Grade 1, 2 and 3a agricultural land, woodland and wetland habitats that will be replaced by housing and warehousing in unsustainable locations, depleting further the populations of insects and other species, driving up (rather than bringing down) air pollution and carbon emissions.

[Official data](#)⁵ 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 health and wellbeing benefits, that are now forever lost to future generations of people and wildlife.

We strongly support the Government's aims to reverse the loss of habitat and the decline of species that is resulting in the concerns raised by this call for evidence, but there must more specific, targeted and mandated action to drive the changes needed.

In addition, we believe environmental regulations need to be strengthened further to ensure the importance of nature's recovery is fully recognised and that the regulations aiming to support these goals are comprehensively adhered to.

The current evidence base for insect abundance in the UK, and the gaps in scientific understanding that require further research

We recognise that there will be other groups, such as the Wildlife Trusts, which are much better placed to provide information on this topic, but we would like to mention the following:

- Initiatives which facilitate insect population growth or insect population decline should be fully researched to understand how growth can be further encouraged and decline can be mitigated (and of course to understand whether indeed populations of pest species are increasing), this research should be carried out at a local level to ensure that actions which can be undertaken in our neighbourhoods are implemented (resulting in the cumulative benefits of a number of smaller schemes)
- Local plans and other planning documents **must** be required to provide comprehensive evidence, rather than piecemeal, incomplete assessments of the habitats and the associated species that are under threat of development

¹ <http://savegmgreenbelt.org.uk/>

² <https://www.greatermanchester-ca.gov.uk/what-we-do/planning-and-housing/places-for-everyone/submission-documents/>

³ <https://steadystatemanchester.net/>

⁴ <https://steadystatemanchester.net/2023/01/03/places-for-everyone-the-carbon-impact-revised-figures/>

⁵ [Local authority green belt statistics for England: 2020-21 - statistical release - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/statistics/local-authority-green-belt-statistics-for-england-2020-21)

- Habitats of significant importance to insect species should be mapped and explicitly protected (the UK has a range of insect (and other invertebrate) scarcity categories and protection/conservation methods, including British and European Protected Species and NERC Act Priority Species. There is also the Red list system, which ranks species from Critically Endangered, Endangered, Vulnerable or Near Threatened, and below this many species are ranked as Nationally Scarce. Additionally, assemblages of species are seen as important and these can range from species dependent on declining habitats (e.g. NERC Act Priority Habitats) to habitat mosaics rich in species numbers. Local Record Centres and local ecologists are able to advise on the importance of local rarities and assemblages)
- Communities should be encouraged to collect and record data on insect species.

The effects of pesticides, such as neonicotinoids or other agricultural control methods on insects including pollinators and their impact on UK food security

Again, others will have much more knowledge on this topic than our group, but we believe scientists in the European Union have undertaken extensive research. The UK does not need to reinvent the wheel if the information is already available. Parliament should prohibit the use of any agricultural control methods that will impact insect populations and/or human health.

The extent that biodiversity initiatives, such as creating reservoir populations, are addressing insect decline and whether there is sufficient co-ordination with the UK food system

Whilst we understand the interest in initiatives such as the creation of reservoir populations, other schemes that can address insect decline at a more local or regional level should also be explored.

We have no confidence that the actions needed are being pursued. Our response is shaped by our recent experience of the P4E⁶ Plan, including its Examination in Public. We strongly believe that this Plan should have identified (and protected) sites for biodiversity initiatives, conservation and restoration, as well as sites for development. Yet, despite covering 9 local authorities, P4E makes no such recommendations.

The P4E Plan also made no allowance for such sites in the development site selection process. In fact, there were no site selection criteria at all relating to the environmental objective (Objective 8, page 42). The ecological impacts of site selection were only considered at stage 3 of the process, when many potential schemes (which may have resulted in less impact on sites that could support the implementation of biodiversity initiatives) had already been filtered out.

Food security and insect decline also needs to be looked at from other perspectives, such as the loss of Grade 1, 2 and 3 best and most versatile agricultural land. Such land should be protected for food production, with clear, nature-based practices, supporting the increase of farmland bird and insect populations.

There should also be a clear understanding of how much land that could support the growth of insect populations or associated biodiversity initiatives has been lost to development (trend information covering at least the last 10 years).

Whether the threat to UK food security from insect decline receives sufficient cross-government priority

Had the threat to UK food security from insect decline received sufficient cross government priority there would be more regulation to prevent the loss of habitat, to require appropriate data collection and analysis and to provide genuine protection for red listed species.

⁶ <https://www.greatermanchester-ca.gov.uk/what-we-do/planning-and-housing/places-for-everyone/submission-documents/>

Additional policy initiatives and solutions needed in the UK and internationally to reduce and reverse the trends in insect decline

There is clearly, currently, much scope for local authorities to avoid prioritising insect decline, food security and other important aspects of nature's recovery.

Again, 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 Plan⁷.

1. The Government must strengthen the requirement to assess the impact of planning on important habitats and associated species populations, with the resulting data being clearly and transparently available to communities for review.
2. Given the UK is described as "*one of the most nature depleted countries in the world and despite nature struggling against all odds to survive, more than one in seven native species face extinction and more than 40% are in decline*"⁸, and that "*recent research suggests that in the UK flying insects have declined by 60% in the past 20 years*", environmental and other regulations must be updated to better protect our environment and support nature's recovery. Instructions should be issued that existing guidance and regulation **MUST** be explicitly followed.

As an example of the National Planning Policy Framework (NPPF) and the Planning Practice Guidance (PPG) not being followed by the P4E Plan, we would highlight PPG paragraph: 011 (Reference ID: 8-011-20190721⁹). This paragraph focuses on what evidence needs to be considered in identifying and mapping local ecological networks. No such data was provided in the extensive P4E documentation. Data about the ecological impact of the Plan was minimal, including for the allocations, meaning that there was little, if any, consideration of how the Plan may influence insect populations and the associated food security issues. There was also no evidence which may have provided relevant indicators, such as the current volume and status of important habitats (number of hectares of Grade 1, 2 and 3 agricultural land, peatland, woodland, wetland, etc). There was no information about the distribution of protected and priority habitats and species, areas of irreplaceable natural habitat or habitats where specific land management practices are required for their conservation. In fact, the implications of the Plan on rural areas and the rural economy was not even mentioned in P4E.

In addition, we were not able to confirm how and which sites were assessed to determine that the "*land with the least environmental or amenity value*" (NPPF paragraph 175) had been allocated within the Plan because the evidence was not available within the Examination Library.

3. The Government should also ensure that advice from Government agencies is fully and comprehensively observed. 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*".

Within the P4E evidence base is a document called the Natural Environment Topic Paper¹⁰. We set out below a short extract (page 40), which highlights advice from Natural England.

⁷ <https://www.greatermanchester-ca.gov.uk/what-we-do/planning-and-housing/places-for-everyone/submission-documents/>

⁸ <https://www.wwf.org.uk/future-of-uk-nature#:~:text=The%20UK%20is%20one%20of,than%2040%25%20are%20in%20decline.>

⁹ [Natural environment - GOV.UK \(www.gov.uk\)](https://www.gov.uk/natural-environment)

¹⁰ <https://www.greatermanchester-ca.gov.uk/GMCAFiles/PFE/Supporting%20documents/07%20Greener%20Places/07.01.26%20Natural%20Environment%20Topic%20Paper.pdf>

3.53 *“The GMSF should give appropriate policy weighting to the important role soils play in providing a wide range of ecosystem services and natural capital benefits in Greater Manchester. The GMSF Soils Policy should seek to safeguard areas of high environmental value that includes deep peaty soils, as well as recognise the natural capital benefits soils provide across a landscape scale. The natural capital benefits of these soils should be valued as a finite multi-functional resource, which underpins Greater Manchester’s wellbeing and prosperity. Decisions about development should take full account of the impact on soils, including their intrinsic character and the sustainability of the many ecosystem services they deliver. To summarise, there are three policy recommendations for the GMSF Soil’s Policy:*

3.54 *The plan should:*

- *Safeguard the long term capability of Best and Most Versatile (BMV) agricultural land (Grades 1, 2 and 3a in the Agricultural Land Classification) (i) as a resource for the future.*
- *Avoid development that would disturb or damage other soils of high environmental value (Specifically areas of Deep Peaty Soils that contribute towards a functioning ecological network for Greater Manchester’s Uplands and Lowlands, which provides natural capital benefits such as carbon sequestration and storage).*
- *Ensure soil resources are conserved and managed in a sustainable way (Soil is a finite resource that fulfils many important functions and services (ecosystem services), as well as providing natural capital benefits; for instance as a growing medium for food, timber and other crops, as a store for carbon and water, as a reservoir of biodiversity and as a buffer against pollution. It is therefore important that the soil resources are protected and used sustainably).*

Despite this guidance, which the document states (paragraph 3.52) *“remains valid for the P4E”*, the Plan allocates sites for development which include peat mosses, Grade 1, 2 and 3 best and most versatile agricultural land, woodland and wetland habitats.

4. The Government should increase the data collection and associated information requirements to ensure there is clarity about the status of wildlife populations in local areas. This could result in specific actions. If, for example, there is best practice to be shared, where populations are rising, or initiatives to be implemented, where populations are declining.

The P4E Plan appeared to make a general assumption that harm to ecology and biodiversity can be mitigated. This is not the case, especially when considering critically endangered species or irreplaceable habitats. Appropriate assessments should have been made (and published on the Examination database) to identify the relative ease of alleviating the potential harm to each impacted species.

5. The impact of development on our natural capital is typically not assessed or it is significantly understated. Insufficient evidence is required (so minimal information is provided) and there is inadequate guidance to ensure appraisals and assessments are undertaken at an appropriate time and to an appropriate level of detail. The Government must address this by requiring detailed natural capital assessments at a local authority level, as a minimum. Guidance should be updated to ensure, for example, that assessments are not carried out when seasonal variations make species activity minimal.
6. Furthermore, we have concerns about the accuracy and completeness of some assessments that are undertaken.

Public bodies and developers should be held to the same standards in relation to environmental claims as those commercial organisations must adhere to. The Green Claims Code¹¹ requires organisations to adhere to the following principles:

¹¹ <https://www.gov.uk/government/publications/green-claims-code-making-environmental-claims>

- claims must be truthful and accurate
- claims must be clear and unambiguous
- claims must not omit or hide important relevant information
- comparisons must be fair and meaningful
- claims must consider the full life cycle of the product or service
- claims must be substantiated.

There is no reason why these same principles cannot be applied to environmental claims that are made in relation to the planning system. It is wholly unacceptable that organisations can publish documents which contain biased, inaccurate or misleading information, about which significant decisions will be made, including those that will negatively impact nature's recovery (including insect populations).

7. The Government must ensure that regulations are fully updated when new Government guidance is issued. Public money has been spent creating (for example) a 25 Year Environment Plan¹², which includes a number of policies, principles and action points that do **not** have to be considered by developers or planners in determining whether a plan is sound or whether a planning application will deliver appropriate benefits.

The [England Peat Action Plan](#)¹³ is another good example. It sets out the Government's vision to reverse the decline of our peatmosses. The Government's aim is to prevent further loss of peatland habitats, to restore more peatland landscapes to their natural state and the document recognises that rewetting peatland areas and returning them to their natural state could make a significant contribution to achieving our targets on reducing carbon emissions, as well as having other benefits for water quality, nature and flood mitigation.

Despite those admirable aims, because there is no specific planning regulation to prevent development on our peatmosses, they continue to be under threat of significant development as can be seen in P4E, which allocates several peatlands for development, rather than for protection.

8. Finally, there appears to be some confusion about the difference between Biodiversity Net Gain metrics and ecology/biodiversity-rich land areas. The BNG metric is based on habitat type, and biodiversity units are calculated using the size of the habitat, its quality and location. A low BNG score does not equate to poor ecology/biodiversity. The Government must correct any assumptions being made as a consequence of this misunderstanding.

¹² https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/693158/25-year-environment-plan.pdf#page=128&zoom=100,72,76

¹³ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1010786/england-peat-action-plan.pdf