

FOCM MIQ Response – Matter 1



Friends of Carrington Moss
Matter Number 1

Matter 1: Legal, Procedural and other General Matters

Issue 1.1: Was the Plan prepared in accordance with relevant legal requirements?

Public consultation

Q1.4. Is there any substantive evidence to indicate that any of the local planning authorities failed to comply with their SCI during the preparation of the Plan?

Noncompliance is evidenced in our representation (page 154) and also by **the lack of responses (just 33 in 2016, from a potential adult population of over 180,000) -** paragraph 1.19 (document 110410) highlighted “*Consultation has been too inadequate.*”

Whilst some aspects of Trafford’s SCIs refer specifically to the GMSF, other paragraphs also apply. Paragraph 1.1 (2015 SCI) seeks a planning system that “*is as **transparent, accountable, socially inclusive and participatory** as possible. The Council wishes to encourage more meaningful community involvement that provides opportunities for more active participation and discussion as early in the plan preparation...*”.

This would only be possible if Trafford took every opportunity to actively involve impacted residents and were honest and transparent about their intentions. Paragraph 2.7 (2015 SCI) does not mention overseeing greenbelt release in GM, neither did many of the communications. This was most acute in 2016 but persisted to 2021. Greenbelt release was not mentioned in the:

- email (page 13)
- webpage (page 22)
- press releases 7456, 7473
- email (page 70)
- webpage (page 79)
- posters (page 82)

The poster for New Carrington talks about a significant greenbelt corridor through the site – but does not mention that much of this corridor is not accessible to local residents. Communications like sales brochures not serious planning documents!

Paragraph 2.10 of the 2015 SCI states that “*the general public will be consulted where appropriate*”. Yet, for New Carrington, there were no site notices (until 2021), no letters to residents, no workshops. The Events (paragraphs 1.20 and 1.21) were insufficient given the size of the Allocation. None of the drop in events mentioned at paragraph 1.13 were held near Allocation areas. Can this really be described as “appropriate”!

Trafford state (document 110410) that they placed an advert in the Messenger, but this paper is not received by many residents. The article talked about protecting and improving greenbelt, not releasing it!

Paragraph 1.6 states “*A hard copy of the draft GMSF document was made available in all of Trafford’s libraries*”. Local resident (JH) commented “We went to Sale library during the GMSF consultation period for the GMSF, we asked to see the display we were told would be there. There was no information available, staff had no knowledge of the consultation and had not heard they should be displaying anything. A lengthy search by one of the staff “in

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the back" revealed they had been sent a poster but had "not been told what to do with it". Not only was nothing displayed, staff said they had no room to put anything up."

Site notices were put up for the first time in 2021. This is too late for any meaningful involvement from residents who were not previously aware. It would not be practical for someone who previously had no knowledge of these plans to make an effective response to what was then a regulation 19 consultation. If these notices had been put up in 2016, they would have alerted local people to the huge development plans for their areas.

Word Count: 500

Sustainability appraisal

Q1.5. Is there any substantive evidence to demonstrate that the sustainability appraisal failed to meet the relevant legal requirements?

We reference the Integrated Assessment (IA) throughout our response. Document 02.01.01 notes (page 225) "*declaration of climate emergencies by GMCA and the 10 local authorities, is the most significant shift since the previous update*". Yet concludes "*that no additions or changes are required*", despite the document acknowledging (page 209) that "*Urgent actions are needed in the next 5 years*".

[Government guidance](#) states that "*Addressing climate change is one of the core land use planning principles which the National Planning Policy Framework expects to underpin both plan-making and decision-taking*". With this in mind, the Climate Emergency Action Plans agreed by each LA, HA and the GMCA, should have been an essential aspect of the IA, and should have supported the formation of a "reasonable alternative" see our response to Q1.6.

Given the [role of a sustainability appraisal](#) (SA), and reference in the guidance to significant impacts/baseline data, it is clear the assessment lacks appraisal of climate emergency mitigation, the rural economy and analysis of the natural capital assets, particularly in relation to the Allocations. Even where information is provided, such as for carbon emissions, it is not available in sufficient detail to enable a clear understanding of the impact of the Plan on GM's Net Zero objective. This is true at both a Regional and a local level. Our [FOI](#) requested the detailed carbon emissions for the New Carrington development, but, after a prolonged period, the Council confirmed they were unable to supply the information. The [guidance](#) cannot be met without visibility of this data.

In addition, (FOCM response, page 146), the actual assessment is very lite-touch and the IA contains gaps in both the issues identified and the IA Objectives/Assessment Criteria (including the omission of an Objective/Assessment Criteria to protect GM's Green Belt). It also includes out-dated, erroneous or incomplete/inadequate data, such as the information on school places and access to health services.

Despite document 02.01.01 (page 151) setting out examples of the benefits that important habitats contribute to society and the economy, the analysis for each Allocation did not demonstrate how each of these is impacted by the change of land use in the Plan and no account is taken of, for example, the difference between commitments in the Transport Strategy and potential actions that are subject to business cases/developer contributions, meaning parts of the assessment are extremely optimistic.

Given Natural England's inputs to the Plan, recognition of the importance of GM's peat mosses, should have been emphasised but, on page 284 (Lowland Wetlands and Mosslands) References 12, 13 and 15 make no mention of the impact of the change of land use.

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As a result of the above, we do not believe this report can be considered to meet the regulatory requirements of an SA, especially as it did not consider all the “reasonable alternatives”, nor is it capable of supporting major decisions that have huge consequences for the health and wellbeing of so many people, ecology and biodiversity and the opportunity to mitigate the climate emergency.

Word Count: 498

Question 1.6

Q1.6. Did the sustainability appraisal consider and compare reasonable alternatives as the Plan evolved, including for the broad spatial distribution of housing, economic and other development?

The Plan (paragraph 1.2) states that “*Collectively our plans are focused on delivering the ambitions in the Greater Manchester Strategy*”. Yet, despite that Strategy highlighting (diagram p47) the climate emergency at its heart, and [the SEA regulations requirements checklist](#) emphasising the importance of taking “*into account the objectives and geographical scope of the plan*”, no alternative climate/environment-focused spatial option was developed.

Point f in that checklist accentuates the significant effects on the environment should include secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects. We do not believe the current assessment provides evidence that these aspects have been covered.

Given the [Climate Change Act 2008](#) establishes a legally binding target to reduce the UK’s greenhouse gas emissions, and the (02.01.01) Scoping Report notes (page 225) that the declarations of climate emergencies by all Authorities in the Region “*is the most significant shift since the previous update to the scoping report*”, and, further, that (page 209) “*Urgent actions are needed in the next 5 years*”, we believe that the Climate Emergency Action Plans should have been an essential aspect of the IA and should have supported the formation of a climate emergency/environment-focused “reasonable alternative”.

Despite alluding to districts having “*a desire to meet expertly determined carbon budgets*”, the review of Growth and Spatial Options (see paragraph 6.8 page 12/13) concluded that a further reasonable alternative had not emerged. This is odd given the strength of feeling on the issue, Trafford Council, for example, [agreed a motion](#) instructing the Leader to write ([20th March 2019](#)) to the Mayor of GM requesting a new spatial options paper be drawn up, prioritising meeting expert-determined carbon budgets for GM, stating that “*These must include air travel, shipping and other transport impacts*” and that “*Trafford Council will require future drafts of the GMSF to follow this approach*”. The response (30th May 2019) confirmed that “*The Spatial Options paper (along with all background and supporting evidence papers) will be reviewed for the next version of the GMSF taking into account all of the comments received during the consultation and of course the Trafford Council motion*”.

The outcome does not appear to accord with [Government guidance](#) which states that “*Sustainability appraisal [SA] can be used to help shape appropriate strategies in line with the statutory duty on climate change and ambition in the Climate Change Act 2008*” and that the SA “*needs to consider and compare all reasonable alternatives as the plan evolves.*” The guidance also suggests that climate risks should be considered “*when allocating development sites to ensure risks are understood over the development’s lifetime*”.

We do not believe the current SA meets these requirements. Cover-all Assessment Criterion such as “*Ensure that communities, existing and new developments and infrastructure systems are resilient to the predicted effects of climate change across GM?*” and “*Promote a proactive reduction in direct and indirect greenhouse gas emissions emitted across GM?*”

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are not sufficiently nuanced to address the needs of those declarations of a climate emergency and certainly do not cover what was set out in Trafford's motion!

Word Count: 511

Equalities

Q1.8. Is there any substantive evidence which demonstrates that the requirements of section 149 of the Equality Act 2010 have not been met?

We highlight issues of inequity and inequality throughout our response.

The sheer volume of documentation was a challenge for everyone but must have been particularly difficult for some of those with protected characteristics. As noted in our original representation, there were many instances of data inconsistencies which made the documents harder to review. Some of the anomalies were undoubtedly typos, which is understandable, but others are more difficult to accept, including the inconsistencies in the New Carrington numbers set out in different documents within the Plan.

A number of the documents were very challenging to review, particularly those which required printing in A3 size to read. Given the layout, the lack of headings on each page and the repetitive content, consultation should have taken place with users to consider alternative ways of presenting the data. It should be noted that the most vulnerable in our society may not have access to A3 printers to be able to review this content.

Objective 5 (p41) does not include any reference to improving equity of access to green spaces for all residents (it should be noted that prosperity is not only measured in terms of financial wealth). In addition, the lack of reference in the Plan to the rural parts of GM, suggests that the inequalities experienced by those residents will not be addressed and their prosperity will not be a focus for improvement.

Some of the other assertions in the Plan, such as the statement that industrial and warehousing provision "*will help to reduce inequalities*" (paragraph 6.26, p117) do not appear to have any supporting background evidence.

We are concerned that the lack of amenities (such as school places, health facilities, sustainable passenger and freight transport) will drive further inequalities, rather than addressing them.

We recognise that Policy JP-P6 calls for a Health Impact Assessment for new development (point C, p187), but we believe such an assessment should have underpinned decisions about each Allocation, as these developments are likely to have significant impacts on existing and future residents (increases in air, noise and light pollution, for example, could result in increased health incidents for those who suffer from respiratory or cardiovascular issues), which will have the greatest impact the most vulnerable, particularly some of those with protected characteristics.

Furthermore, as we mentioned in our response, the [Government's Public Health briefing](#) (2016) suggests that health inequalities are further exacerbated because "*residents of deprived communities tend to travel less than the better off, but feel the impact of other people's travel. In short, increasing car dependency has led to increasing unfairness*". The lack of committed sustainable transport in the Allocations is a clear example of this.

Word Count: 442

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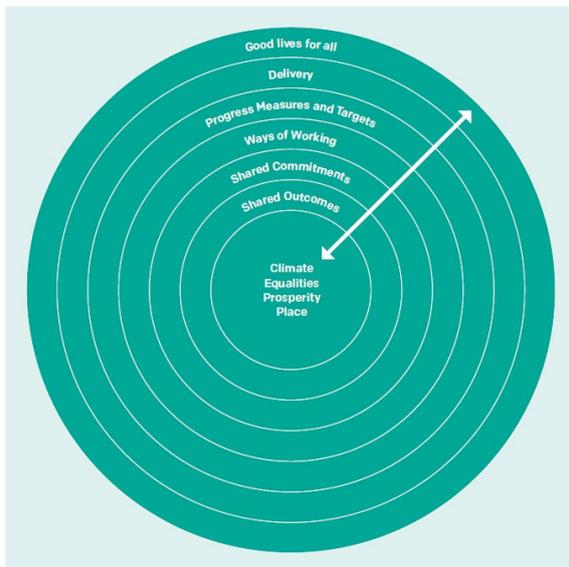
Greater Manchester Strategy

Q1.10. Is it legally compliant and consistent with national policy for the Plan to set out the spatial expression of the Greater Manchester Strategy to underpin Greater Manchester’s wider investment and infrastructure decisions?

Given that the GM Strategy puts the climate and equalities agendas at its heart it can be argued that this Plan is **NOT** the spatial expression of that Strategy and, in its current form, it certainly will not play a “vital role” in delivering its aims.

As we state on page 1 of our response, our biggest concern is that the climate emergency has not been placed at the forefront of this Plan.

The fundamental importance of addressing the climate emergency resonates throughout the Strategy with the diagram (p47) highlighting what should have been the basis of the Growth and Spatial Options paper, as the document states it shows how GM’s priorities have been structured. This suggests that the statement within the Plan (para 8.60 p168) that the “*need to deliver the positive long-term outcomes of the Greater Manchester Strategy is considered to amount to exceptional circumstances which justify altering the boundaries of the Green Belt*” is incorrect.



The Strategy also highlighted the importance of the [Greater Manchester 5-year Environment Plan](#), stating (p57) that “*Actions to address the climate emergency should be woven through and underpin everything that we do, and this will support the achievement of this Strategy*”. That 5-year Environment Plan states (p58) that GM must prioritise action to “*protect, maintain and enhance our key natural assets*”. Priority 1 is Managing our Land Sustainably, which includes (p61) restoring “*50-75% of our peatlands*”. In addition, this document sets out responsibilities for LAs, including local policy (p63), which states:

- “*GMCA and LAs will embed a natural capital approach into strategy and plan development*”
- “*GMCA and LAs will support peatland restoration approaches and provide a clear framework for approach and delivery as part of a resilience strategy*”.

Yet, despite each district, each HA and the GMCA all declaring the climate emergency, there is no climate or environment-focused spatial option and peatlands across GM are under threat of development due to the proposed release of green belt in this Plan.

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The GM Strategy is also aligned (p45) with the UN Sustainable Development Goals, with the document recognising (p11) that *“Climate change is the single biggest threat that the world faces”* and that *“Environmental challenges threaten the health and prosperity of our city-region. If we don’t all act now, these will only worsen and the consequences will be felt even further by future generations”*. Yet this unsustainable Plan does not consider the impact of the unnecessary loss of irreplaceable habitats, Grades 1, 2 and 3 agricultural land, or woodland on future generations.

The Strategy (p13) emphasises that urgent action is needed to achieve carbon neutrality and states that *“the rate at which we deliver decarbonisation is key”*. It continues (p14) *“Embedding understanding and assessment of possible impacts early in our policy planning and development activities will enable us to reconsider decisions that take us further away from our carbon neutral ambition”*. The document mentions (p9) that GM will accelerate plans towards the carbon neutral ambition and continues (p31) that *“We want to make sure that our policy on aviation matches our ambition to be a world leader on climate action, in line with our carbon neutral 2038 target and our carbon budget.”*

With these statements in mind, it is anomalous that a climate/environment-focused spatial option was not proposed.

Employing *“robust quantitative and qualitative evidence-based approaches”* to underpin all priority setting and decision-making is also a key principle within the GM Strategy (p62) which enables *“the more deliberate and effective targeting of plans, policies and interventions, responsive to need.”* Yet the Plan does not include such evidence for carbon emissions, natural capital, the rural economy and more, despite the decision to release 2,430 hectares of greenbelt.

The GM Strategy also highlights the importance of community engagement stating (p59) that *“We believe that people should have a say over the places in which they live”* and that *“We will seek to ensure we put people at the centre of our decision making”*. Yet this is not the approach taken in the shaping of this Plan.

Given the above, the GM Strategy appears to be more aligned with National Policy than the Plan itself.

Word Count: 688

Plan period

Q1.12. Is the plan period 2021 to 2037 justified, and will it provide an effective framework for local plans?

We agree with the SGMGB response to this question.

Word Count: 9

Total Word Count: 2,648

Kind regards

Marj Powner (Chair)

Friends of Carrington Moss