

# FOCM MIQ Response – Matter 2



Friends of Carrington Moss  
Matter Number 2

## Matter 2: Amount of Land Needed for Housing, Office and Industrial/Warehousing Development

**Issue 2.1: Does the Plan set out a housing requirement figure for the Plan area that is justified and consistent with national policy?**

**Q2.1. Is the requirement to deliver a minimum of 164,800 net additional dwellings over the period 2021-2037 positively prepared, justified and consistent with national policy?**

Please see our responses in our representation (p71) and to MIQ 4.5.

The document states (p133) that “A *minimum of 164,880 net additional dwellings will be delivered over the period 2021-37*” but this wording is misleading as the strategic intent appears to be to plan for sufficient land supply totalling 190,752 homes (including the release of greenbelt).

Delivery of a minimum 164,880 net additional dwellings over the plan period meets the requirements of the Government’s standard formula but, given that strategic intent, it should be noted that Ministers have repeatedly confirmed, both in writing (including this [blog](#)) and in Parliamentary debates, that protecting the greenbelt is a priority and that, where available land supply is constrained by factors such as the greenbelt, “*an area therefore has to plan for fewer new homes*”.

GM has sufficient land supply to achieve the Government’s formula **without** releasing green belt. This land supply is the cumulative figure of districts’ 2020 SHLAAs. [Government guidance](#) suggests the SHLAA is “*an important source of evidence*”, that communities should be involved (providing invaluable local knowledge as highlighted in our original response p131), and that development potential “*is a significant factor*”. Given the completed SHLAAs set out the sites that are considered “*suitable, available and achievable*”, it is not necessary to prematurely release additional green belt land. As stated in our response to MIQ 4.5, we do not believe there is a quantitative requirement to release green belt land to meet housing need.

NPPF paragraph 31 states that “*The preparation and review of all policies should be underpinned by relevant and up-to-date evidence*”. NPPF paragraph 68 highlights the need for Authorities to have a clear understanding of the land available in their area and paragraph 71 confirms it is acceptable to make an allowance for windfall sites.

With this in mind, up-to-date SHLAAs are needed to support this Policy and, as the Plan should be considered as a whole (verified repeatedly by the GMCA in their responses to Planning Inspector questions), it should be possible to take windfall sites into consideration (including the potential for the over-supply of Office Floorspace to be repurposed for housing).

Policy JP-H 1 should also adhere to other prerequisites, such as, for example:

- NPPF para 11a – promotion of sustainable patterns of development (reinforced in paragraph 16a) – the lack of committed sustainable passenger and freight transport options suggests this will not be achieved
- NPPF para 16b – plans should be deliverable (the 40% increase in completion rate will be a challenge to achieve and will not be under the control of the Authorities)

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- NPPF para 16c – plans should be shaped by “*early, proportionate and effective engagement*” with communities – the level of objections to the release of green belt suggests this has not been achieved
- NPPF para 16d – policies should be clear and unambiguous – it is not clear how Authorities plan to ensure brownfield land is delivered as a priority, before green belt is exploited.

Furthermore, NPPF Section 14 highlights the importance of consideration of the climate emergency, including alignment with the objectives and provisions of the Climate Change Act 2008. Given the Authorities’ declarations of a climate emergency, increasing evidence from ONS in the 2016 and 2018 household projections (that the growth anticipated in the 2014 projections no longer reflects expectations), and the priorities set out in the GM Strategy, an alternative spatial option, focused on the climate/environment, maximising sustainable passenger and freight transport initiatives, should have been considered.

With these points in mind, whilst the requirement to deliver a minimum of 164,880 net additional dwellings over the period 2021-2037 may be considered to meet the Government’s methodology for calculating housing need, we have no confidence (given the planned release of green belt) that the implementation of Policy JP-H 1 will compel a brownfield preference approach in delivery. The Policy should be updated to adopt the approach set out in our response to MIQ 4.5, which would ensure the release of green belt is not considered prior to a (5<sup>th</sup>-year) review, taking into consideration newly available evidence (up-to-date SHLAAs, etc) and genuine consultation with affected local residents.

Finally, we’d like to mention our concerns about the delivery of genuinely Affordable homes included within these figures. As set out in our response, p16, GM’s recent past record is very poor.

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**Issue 2.2: Are the amounts of industrial and warehousing and office development that the Plan identifies as being required positively prepared, justified and consistent with national policy?**

**Need for land for industrial and warehouse developments**

**Q2.2. Is the requirement to provide at least 3.33 million sqm of new, accessible industrial and warehousing floorspace in the Plan area over the period 2021-2037. positively prepared, justified and consistent with national policy?**

Please see our responses in our representation (p68), MIQ 2.1 and MIQ 4.7.

As set out in our response to MIQ 4.7, the requirement to provide 3.33m<sup>2</sup> I&W space is not positively prepared or justified. The rationale for the buffer is flawed, with the uplift representing (05.01.02, paragraph 1.12) “*the upper-end of margins*”. The allocation of green belt land, increasing that margin to over **56%** (and, when including the post Plan developments, the margin hits over **75%**). There is no reasoning set out in the documentation for this excessive buffer. It is clear, therefore, that, especially given the proposed impact on green belt boundaries, that this proposal is not positively prepared or justified.

The national policy requirements set out in our response to question 2.1 above, also apply to employment floorspace. In addition, NPPF paragraph 32 states that significant adverse impacts on economic, social and environmental objectives “*should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued*”. Given the impact of the Plan on irreplaceable habitats, climate mitigation (including

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increased carbon emissions) and Grade 1, 2 and 3 bmv agricultural land, we do not believe alternative options have been explored to reduce or eliminate such impacts, including consideration of a climate/environment-focused spatial option.

It should be noted that the proposal for I&W does not comply with National Policy as only 3 of the 14 green belt sites meet criteria 1 of the site selection process (and each of those three have provisos), this means:

- the chosen green belt sites are not in sustainable locations and do not have firm commitments to transport infrastructure to make them sustainable the sites are not previously developed land and the approach set out at paragraph 6.31 means green belt will be released immediately following plan approval, existing businesses are expected to relocate and expand on the green belt and those “*poorer quality current employment sites*” will be added to the brownfield register (this does not seem consistent with Objective 3)
- the planned developments will severely impact the rural economy in those locations (NPPF paragraph 174(b)).

NPPF paragraph 82 advises that planning policies should set out a clear economic vision and strategy which “*proactively encourages sustainable economic growth*”. The lack of commitment and investment to sustainable passenger and freight transport and the impacts on the environment and biodiversity (mentioned above), including loss of the potential to enhance natural capital, suggests this has not been achieved.

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### **Need for additional land for office developments**

#### **Q2.3. Is the requirement to provide at least 1.9 million sqm of new, accessible office floorspace in the Plan area over the period 2021-2037 positively prepared, justified and consistent with national policy?**

Please see our responses in our representation (p67) and MIQs 2.1 and 2.2 above.

The advice set out in 05.01.02 (para 1.9) states that the past completions approach is based “*on a robust, widely accepted methodology*”. The Assessment applies a weighting adjustment of 2.2% to account for atypical years, which does not reflect that there will be atypical years in the next 16 year period too (especially given the Ukraine war and the rising inflation levels). As with I&W, the document confirms (paragraph 1.12) that the buffer uplift added represents “*the upper end of margins*”. Paragraph 1.19 suggests a typical buffer is between “10% to 20% or 2 to 5 years’ worth of annual need (for a 20-year Plan period)”. It is clear, therefore, that, given post-pandemic changes resulting in the need for more flexible uses of Office Floorspace, there is an opportunity to significantly reduce the margin applied.

With this in mind, and especially as Land Supply already far outweighs anticipated need, there is no justification for releasing any green belt to satisfy the need for Office Floorspace. GM should be taking advantage of the proximity of the existing buildings to transport infrastructure and remove the proposal to release green belt within the Manchester Airport Enterprise Zone key location (paragraph 6.24) from the Plan.

As mentioned in the responses above, the excess existing Land Supply for Office Floorspace can also be repurposed to reduce the need for changing green belt boundaries across GM.

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The national policy requirements set out in our response to questions 2.1 and 2.2 above, also apply to this employment floorspace.

With all these points in mind, we do not believe this Policy is positively prepared, justified or consistent with national policy.

A review of **ALL** available Employment Land Supply should be carried out (in collaboration with local residents and their representatives). This review should also consider an appropriate margin, potential use of unneeded Office Floorspace, and the possibility of “windfall” sites becoming available.

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**Total Word Count: 1,448**

Kind regards

Marj Powner (Chair)

Friends of Carrington Moss