

FOCM MIQ Response – Matter 3



Friends of Carrington Moss

Matter Number 3

Matter 3: Spatial Strategy and Methodology for Selecting Site Allocations

Issue 3.1: Does the Plan set out an appropriate spatial strategy, taking into account reasonable alternatives?

Spatial strategy

Q3.1. Is the overall spatial strategy aimed at achieving core growth and inner area regeneration, boosting northern competitiveness, and sustaining southern competitiveness an appropriate strategy, taking into account reasonable alternatives?

As stated in our response to question 1.10, given that this Plan aims to be the spatial expression of the GM Strategy, an alternative spatial option, putting climate/environment at its heart, should have been considered.

This does not suggest the aims of achieving core growth, inner area regeneration, increased northern competitiveness and sustained southern prosperity could not be part of that alternative option.

As we set out in our original representation, modifying the statement in 07.01.25 (paragraph 6.9) **from** making “a small net reduction in the total size of the Green Belt, so that the overall scale of growth can be accommodated” **to** making ‘a small net reduction in growth to accommodate the retention of green belt as it is important to mitigating climate change, provides a number of ecosystem services and offers a variety of other beneficial uses’ would focus the Plan on delivering all the priorities set out in the GM Strategy and the [GM 5-year Environment Plan](#).

Given each district, each HA and the GMCA have all declared the climate emergency, the spatial strategy should be aligned with the UN Sustainable Development Goals, the carbon neutral and clean air aspirations and addressing the requirements of GM’s recently declared [biodiversity emergency](#).

Word Count: 203

Housing distribution (Table 7.2)

Determining the housing distribution proposed in the Plan

Q3.2. Is the proposed distribution of housing development between districts (2021-2037) in Table 7.2 based on adequate and proportionate evidence?

The Plan is very confusing in terms of its inconsistent representation of its goals. The GMCA repeatedly suggest that the Plan should be considered “as a whole” (eg 110412-regulation-22-summaries-of-thematic-main-issues). Yet, the “rules” associated with distribution of housing development do not follow that principle.

Given this is a regional Plan, housing distribution should be addressed in a way that meets the aims of the Plan, which is to achieve core growth, inner area regeneration, increased northern competitiveness and sustained southern prosperity. Other than the “rules” set out in document 02.01.10 (paragraph 5.7), the Plan does not set out any specific district-based objectives.

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Table 7.2 should be accompanied by additional evidence such as up-to-date SHLAAs, the inclusion of windfall (including any opportunity to repurpose the oversupply of Office floorspace) and confirmation of expected densities. In addition, more evidence is needed about the amount of genuinely affordable homes that will be available as a consequence of this distribution.

Word Count: 155

Housing distribution and spatial strategy

Q3.3. Is the proposed distribution of housing development between districts (2021 to 2037) in Table 7.2 consistent with the spatial strategy summarised in Figure 4.1 and paragraphs 4.17 to 4.19 and detailed in policies JP-Strat1 to JP-Strat11? In particular:

- a) **Will the minimum housing requirement figures in Table 7.2 for Manchester, Salford and Trafford collectively help to deliver core growth and inner area regeneration?**
- b) **Will the minimum housing requirement figures in Table 7.2 for Manchester and Trafford collectively help to sustain southern competitiveness?**
- c) **Will the minimum housing requirement figures in Table 7.2 for Bolton, Bury, Oldham, Rochdale, Salford, Tameside and Wigan collectively help to boost northern competitiveness?**

As mentioned in our response to MIQ 3.2, to determine delivery of these goals, more evidence is needed, such as up-to-date SHLAAs and data confirming, for example, the expected number of genuinely affordable homes and, conversely, investment properties.

For a) inner area regeneration will not be achieved by a supply of typically empty investment properties.

For b) and c), much of the development is planned in unsustainable locations on the green belt. This will not benefit productivity, carbon emissions, or inequalities. Furthermore, the New Carrington development is described in various Plan documents as providing “*the only opportunity in Greater Manchester to deliver a new settlement of significant size*” which is odd for two reasons:

- Firstly, there is no indication in any of the Spatial Options that a “*new settlement of a significant size*” is either required or desirable. Secondly, if there is a genuine intention to boost northern competitiveness, it is astounding that there is no indication in the documentation that any effort has been made to identify similar sites on brownfield in the north of the region.

Word Count: 177

Housing distribution and housing market areas

Q3.4. Would the proposed distribution of housing development help to ensure that sufficient land will be available in the right places to meet the housing needs of present and future generations?

An updated version of the [SHMA](#) was produced in January 2019.

Word Count: 11

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Issue 3.2 Were the allocations in the Plan selected using an appropriate methodology based on proportionate evidence?

Housing allocations

Q3.5. Were the housing allocations in the Plan (including the relevant parts of mixed use allocations) selected using an appropriate methodology based on proportionate evidence?

Document 03.04.01 states (paragraph 5.1) that the purpose of the site selection methodology is to “*identify the most sustainable locations for residential and employment development*”. The methodology appears to have limited site selection to large unsustainable sites in the greenbelt, ignoring smaller sites which may be in more sustainable locations. In addition, the lack of a climate/environment-focused spatial option has resulted not only in the erroneous assumption that additional sites are needed but also in gaps to the criteria used for site selection.

Contrary to paragraph 5.3 (03.04.01), the Vision for GM **does not** mention delivery of inclusive growth (Plan, paragraph 3.1). The GM Strategy (p3) is consistent with the Plan Vision (paragraph 3.1) and prioritises addressing the climate emergency and inequalities (p47). It is, therefore, inappropriate to create a site selection methodology that focuses on the unnecessary release of greenbelt to achieve nonessential growth. The site selection methodology has resulted in a “flexibility buffer” (paragraph 6.14) of almost **186%** above the expected population increase (see our response to Matter 2).

An appropriate methodology should prioritise up-to-date SHLAAs.

Following this, and prior to commencing Stage 1 there should have been consideration of large/medium windfall sites, the conversion of excess Office Floorspace and assurance that expected densities have been achieved on brownfield land. Many of those sites **are** in sustainable locations.

The greenbelt harm assessments were not carried out until Stage 4, meaning that sites that may result in less harm to the greenbelt had already been excluded from the process. Furthermore, the Call for Sites (03.04.01, paragraph 3.4) is extremely dated and should have been refreshed prior to submission.

Paragraph 6.1 (03.04.01) suggests that the site selection criteria have been “*informed by the Vision, Objectives and Spatial Strategy*” and have been used to “*guide the selection of sites within the Green Belt for development*”. Yet, all the declarations of a climate emergency should have signalled a change in approach. It is also clear from the responses to PQ20 that there are no criteria that address Plan Objectives 8 or 9. So, no focus (for example) on sufficiency of social infrastructure, whether the green space plays a role in climate resilience or reducing flood risk, or whether nature’s recovery will be impacted. Despite the site suitability assessments, this has resulted in sites being chosen which, for example:

- are not in sustainable locations, relying heavily on road transport, increasing carbon emissions and air, noise and light pollution
- are important for addressing climate resilience
- impact irreplaceable habitats

The aim is to “*demonstrate a clear, consistent and transparent approach to the selection of sites*”. Yet, liberties have been taken with the interpretation of the criteria. The New Carrington Allocation, for example, is shown to meet Criteria 1 when the brownfield land already has planning approval and the remaining greenbelt/POL has no PDL and is not well served by public transport. It is also considered to meet criteria 2, when it is only in close

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proximity to Port Salford as the crow flies (with the Manchester Ship Canal preventing direct access). There are concerns with the way in which the other criteria have been assessed for New Carrington, as set out in our original representation (p131).

Identifying sites within broad “*Areas of Search*” based on Site Selection Criteria is a flawed approach given the criteria gaps mentioned above. In addition, Paragraph 6.37 suggests Criterion 6 and 7 were addressed using local knowledge, yet the responses to our Alternative Land Supply document (see our original representation p128) suggest local knowledge is sadly lacking.

Furthermore, despite being told repeatedly that this Plan needs to be considered “*as a whole*” (eg 110412-regulation-22-summaries-of-thematic-main-issues), the “*rules/principles*” incorporated at Stage 3 are focused on individual Authorities, rather than regional achievement of the key goals.

The document suggests (paragraph 6.10) that each LA reassessed their land supply to ensure that the release of greenbelt could be kept to a minimum. Yet no opportunity was taken to engage local communities in this work. Our Alternative Land Supply document (see page 128 of our representation) demonstrates that local knowledge is critical.

Word Count: 677

Q3.6. Are the locations of the housing allocations in the Plan (including the relevant parts of mixed use allocations) consistent with the spatial strategy summarised in Figure 4.1 and detailed in policies JP-Strat1 to JP-Strat11?

As mentioned in the response to question 3.3 above, choosing New Carrington as “*the only opportunity in Greater Manchester to deliver a new settlement of significant size*” is a strange decision given the desire to boost northern competitiveness, the amount of brownfield sites in the north of the region and the lack of expectation in any of the Spatial Options that a new settlement is either required or desirable.

In addition, the GM Strategy highlights [six growth locations](#) (p41) but New Carrington, despite being the “*only opportunity*” to deliver a new settlement, is not mentioned.

The Policies do not accurately reflect the land being developed so the Allocations cannot be consistent. Policy JP-Strat 9, for example, disingenuously suggests (paragraph 4.63) that the New Carrington development is focused around the former chemicals complex in Carrington. This is incorrect. The development is focused on and around the second largest peat moss in Greater Manchester. The issues arising from this are discussed in our responses to Q31 and Q108.

The Policies do not provide an impartial representation of their areas, Policy JP-Strat 9 again, for example, fails to mention the irreplaceable habitats in the area. A balanced and sustainable Spatial Strategy would not omit such natural assets because of their capacity to address climate resilience, carbon capture and flood risk. In listing the potential of key assets, the Policy focuses on the main town centres and Manchester Airport, it does not mention the potential of our peat mosses to be restored to deliver “*broader sustainability objectives*” (paragraph 4.61).

Policy JP-Strat 11 states (paragraph 4.70) that the location “*enables the redevelopment of the extensive former Shell Carrington industrial estate*”, yet these brownfield areas have already been granted planning approval, outside of this Plan. The parts of the Policy area that await approval are on green belt or protected open land and mostly comprise peat moss, grade 2, best and most versatile, agricultural land, wetland and woodland areas.

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Paragraph 4.71, for example, suggests New Carrington will be a sustainable neighbourhood “rather than an isolated community” and talks about maximising the regenerative potential for Carrington, Partington and Sale West. Yet there are no commitments to any sustainable passenger or freight transport within this Policy area, local job opportunities are limited to industrial and warehousing sites (typically low paid and subject to automation), rural/green jobs in the area will be reduced significantly by this development.

Whilst we understand the desire to promote the Plan, the Policies should be articulated in an unbiased, objective way so this examination can consider all the facts.

Word Count: 425

Employment allocations

Q3.7. Were the employment allocations in the Plan (including the relevant parts of mixed-use allocations) selected using an appropriate methodology based on proportionate evidence³⁴?

It is of concern that the employment sites in the Plan were chosen based on their location, since 14 of the 15 sites are in the greenbelt and intend to release all, or most of that land.

We believe these 14 sites are not in sustainable locations, demonstrated by a review of the site selection criteria, which confirms that only 3 of the employment sites meet criterion 1 (Land which has been previously developed and/or land which is well served by public transport). Of these three sites:

- JPA-1 is close to motorways, with paragraph 11.17 confirming that “*Outside of the motorway network, much of the area proposed for development is currently served by an inadequate transport network*”
- JPA-30 appears to be the only employment development that will have access to sustainable transport options, however, this site has a “*layer of natural peat, ranging in thickness from 1.2m to 2.5m*” (Topic Paper) so development will be taking place on an irreplaceable habitat
- JPA-33 only ticks this box because the Allocation includes previously developed land that already has planning approval (and has construction either completed or is underway). The Plan mentions (paragraph 4.72) that the New Carrington development is “*currently served relatively poorly by public transport*”. There is only one commitment in the Transport Delivery Plan (and that is to a new road). No sustainable passenger or freight transport options are committed, despite the size of this development. No trams, no trains and no improvements to bus services (we have checked this via an FOI request).

The Plan suggests that the current proposal is for **only 47%** of the I&W sites to be built in urban areas (paragraph 1.42). Yet, the significant oversupply of Office Floorspace (particularly some of the older buildings, which may be unviable for conversion to homes) could be used to increase this figure, especially as these sites tend to be in sustainable urban locations.

With that in mind, we believe the Employment Allocations have not been selected using an appropriate methodology and we suggest there is a review of **ALL** available Employment Land Supply, to be carried out in collaboration with local residents and their representatives. This review should also consider an appropriate margin/buffer, the potential use of unneeded Office Floorspace, and the possibility of “windfall” sites becoming available.

It should be noted that there is no assessment of the employment opportunities lost as a consequence of the changes in land use, particularly those in rural locations. Furthermore, where allocations are of a scale that is nationally or globally significant in terms of attracting new businesses, the sustainable passenger and freight transport options should be a commitment and not subject to business cases and developer contributions.

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Word Count: 448

Q3.8. Are the locations of the employment allocations in the Plan (including the relevant parts of mixed-use allocations) consistent with the spatial strategy summarised in Figure 4.1 and detailed in policies JP-Strat1 to JP-Strat11?

Please see our response to question 3.6.

Word Count: 7

Issue 3.3 Are the allocations in the Plan based on proportionate and adequate evidence about the impacts on the strategic road network?

Q3.9. Are the allocations in the Plan based on proportionate and adequate evidence about the impacts on the strategic road network?

The report from National Highways has not yet been added to the evidence database.

There is currently very limited information about the impact of the Allocations on the SRN (or local roads) and what is available is very difficult to interpret as the numbers used do not appear to relate to the planned level of development, including the expected volume of HGV traffic, where this applies. With this in mind, we are very concerned about the basis for the calculation of the impact on the SRN. The information needs to be comprehensible and clearly show the impact of each Allocation on the SRN (and the local area). The data related to current and predicted air pollution levels and carbon emissions for each Allocation area should also be provided as key evidence to this Plan. Until all such data is available, we believe the evidence is not proportionate or adequate.

Whilst we understand the capacity of the road network has been assessed (we assume in accordance with PPG paragraph: 007 Reference ID: 54-007-20141010), the figures that have been produced for the Allocations are not clear or easily digestible. As an example, we cannot find any reference to HGV traffic numbers in the Trafford Transport Locality Assessments (TLAs), which appears to be a specific requirement of PPG 007 - ***“where there is known to be a significant level of heavy goods vehicles traffic, a classified count (identifying all vehicles separately) should be provided”***.

For the New Carrington Allocation, for example, the TLA and its Addendum (09.01.15, 09.01.27) report different numbers for both housing and employment space to those in the Plan and do not provide the required information to determine what the actual level of traffic is likely to be. This would include (separating HGVs from cars, and residents from employees, in each case):

- current traffic figures relating to the Allocation area
- increases in traffic from proposed developments already approved within the Allocation area
- increases in traffic from the proposed developments, not yet approved, within the Allocation area
- the expected level of traffic from outside the Borough, including from Lymm/Warrington
- the level of traffic from proposed developments already approved just outside the Allocation area, but within the Ward boundaries of Bucklow St Martins, St Marys Ward and Bowdon Ward

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- the level of traffic from proposed developments not yet approved, just outside the Allocation area, but within the Ward boundaries mentioned above.

None of this traffic information is available, despite being requested repeatedly by residents for almost 2 years (including via [FOI](#)). We have also requested workshops be held to discuss traffic issues. Our requests for this and other workshops have not been addressed.

For 09.01.15, there is no access to the data included in the Reference modelling scenario mentioned in paragraph 6.2.1. It appears to be assumed that all the HGV and other employment traffic is included in this data (paragraph 6.2.3). For 09.01.27, there is no access to the reference case committed development traffic numbers (paragraph 4.1.3). This data is needed to validate the very low figures estimated in these documents.

The document suggests the “*site will primarily deliver family housing*” (10.09.07, p79). Those families will need to get their children to schools/nurseries and employees will need to travel to work (given the limited local employment options lack diversity). So, as there are no trams, no trains and no committed improvements to bus services, it is clear that the traffic numbers (TLAs, Table 6, p66 and Table 3, p17), purporting to show the additional traffic to be generated by the New Carrington Allocation, are grossly under-estimated. It is unclear whether these numbers include employment traffic or any representation in relation to HGV volumes.

Word Count:612

Q3.10. Is there substantive evidence to indicate that the development proposed in the Plan, in combination with other committed and planned development, would have an unacceptable impact on highway safety or that the residual cumulative impacts on the road network would be severe? In particular:

a) Could any significant impacts on the transport network (in terms of capacity and congestion), or on highway safety, be cost effectively mitigated to an acceptable degree?

b) Does the Plan include effective policies to secure the necessary mitigations?

Significant impacts on the transport network could be mitigated by prioritising commitments to sustainable passenger and freight transport options (proposed in Policies JP-Strat 14, JP-C1, JP-C3, JP-C4, JP-C5, JP-C6 and JP-C7) reducing car dependency, providing substantial reductions in carbon emissions and improving air quality.

The Policies in the Plan aim to be effective, JP-C1 point 5, for example, states that the Plan supports a range of measures including “*the Global Street Design Guide*” which prioritises pedestrians, active travel and public transport users. Yet, the Allocations are not in sustainable locations and do not have commitments to sustainable passenger and freight transport.

The New Carrington development, for example, has only one commitment in the Transport Strategy 2040 and that is to a new road. At this location there is a former railway line and the site is in close proximity to the Manchester Ship Canal, yet there are no proposals to utilise those options for either freight or passengers, which means developing the site will result in huge increases in traffic, air, noise and light pollution and carbon emissions and will add to highway safety risks.

Word Count: 185

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Addendum

Matter 3: Spatial strategy and methodology for selecting site allocations

Issue 3.4 Do the allocations in the Plan take appropriate account of the presence of minerals and minerals infrastructure?

Q3.11 Do the allocations in the Plan take appropriate account of the presence of minerals and minerals infrastructure? In particular:

- a) Was the presence of minerals and minerals infrastructure adequately taken into account when deciding which sites to allocate in the Plan?**
- b) Are any of the allocations within minerals safeguarding areas designated in the adopted Greater Manchester Joint Minerals Development Plan Document or other relevant development plan document?**
- c) Are the policies relating to allocations in the Plan consistent with policies in the adopted Greater Manchester Joint Minerals Development Plan Document and any other relevant minerals and minerals infrastructure policies in other adopted development plan document?**

- a There is nothing in the spatial options or the site selection framework to discourage selection of sites where there is a presence of minerals, including irreplaceable habitats.
- b Yes, much of green belt portion of the New Carrington Allocation appears to be in a mineral safeguarding area (according to the Map available on [Trafford's website](#)).
- c It should be noted that the GM Joint Minerals Development Plan is now almost 10 years old. It does not reflect the declarations of a climate emergency made by all the Authorities and, as such, does not afford appropriate protection to peat deposits.

Word Count: 100

Total Word Count: 3000

Kind regards

Marj Powner (Chair)

Friends of Carrington Moss