

FOCM MIQ Response – Matter 4



Friends of Carrington Moss
Matter Number 4

Matter 4: Green Belt

Issue 4.1 Were all reasonable options for meeting the identified need for housing and employment development on land that is not in the Green Belt fully examined?

Land within existing urban areas

Q4.1. Were all reasonable opportunities for meeting the need for (a) housing and (b) industrial and warehousing development within the existing urban areas fully examined, including through making as much use as possible of suitable brownfield sites and underutilised land and optimising the density of development?

We do not believe all reasonable opportunities were examined to prioritise meeting the need for housing and I&W development within existing urban areas for the following reasons:

- the published SHLAAs do not represent the most up-to-date information and current data has not been reviewed with/by local communities (who have the local knowledge needed to assess their comprehensiveness)
- there has been no new call for brownfield sites prior to the submission of the final documentation
- there has been no consideration of large/medium windfall sites
- there has been no consideration of conversion of excess Office Floorspace (much of which would be in sustainable locations)
- there should also be clear information published with the Plan to confirm that maximum densities have been/will be achieved on brownfield land.

As stated in other MIQ responses, we believe consideration of a climate/environment-focused spatial option would have resulted in different site selection criteria, taking the sole focus of that exercise away from large, unsustainable sites in the green belt.

Word Count: 163

Safeguarded land and protected open land

Q4.2. Were all reasonable opportunities for meeting the need for housing and industrial and warehousing development on existing safeguarded land and protected open land fully examined?

Even POL/Safeguarded land, particularly that which is grade 1, 2 or 3 bmv agricultural land, woodland, wetland or peatland, should not be considered for development until all brownfield land has been fully utilised.

In addition, some POL/safeguarded land was designated many years ago, meaning that a case could be made for the land to be protected/safeguarded for other reasons today, such as the opportunities for mitigating the climate emergency, reducing the impact of flooding on neighbouring properties and food security.

Word Count: 80

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Issue 4.2 Is removing land from the Green Belt as proposed in the Plan necessary to ensure that the identified need for housing and employment development can be met in a way that promotes sustainable patterns of development?

Sustainable patterns of development

Q4.4. In selecting the allocations that are removed from the Green Belt, was first consideration given to land which has been previously developed and/or is well served by public transport?

The Site Selection criteria shows that only 13 of the 34 Allocation sites (that result in the release of green belt) met Criteria 1 (previously developed land/well served by public transport). As mentioned in our response to MIQ 3.7, only 3 of the 14 employment sites (that require the release of green belt) meet this requirement but two of these are not well served by public transport, and the third is proposed development on an irreplaceable habitat.

Of the 13 Allocation sites which do meet the criteria, three are considered to be poorly served by public transport and this will only change if such requirements are committed in the GM Transport Strategy Delivery Plan. This is currently not the case.

Effectively this means that of the 34 Allocation sites (that require the release of green belt), only 10 currently fully or partially meet the requirement to be well served by public transport and of the 6 that meet the PDL element of the criteria, there are caveats, for example:

- New Carrington - the PDL already has planning approval and construction has started, this land should be removed from the Allocation otherwise the site selection is merely a box-ticking exercise, with Site Selection criteria shaped according to the chosen Allocations, rather than the other way around
- Seedfield – only 50% is PDL
- Beal Valley – the PDL element of the Allocation is already in the SHLAA

This analysis of the Site Selection criteria demonstrates that the majority of the sites are neither PDL nor well-served by public transport.

Word Count: 255

Removing land from the Green Belt to provide land for housing development

Q4.5. Is there a quantitative need to remove land from the Green Belt in the Plan area to ensure the provision of at least 164,880 net additional homes in the period 2021 to 2037?

Please see our representation (p71) and our response to MIQ 2.1.

The housing need calculated using the Government's formula results in the figure of 164,880 homes (LHN), which would meet the housing needs of over c392,000 people*. The population of the Plan area is projected to organically increase by c158,200 between 2021 and 2037 (paragraph 7.14), resulting in a need for c66,500 dwellings*. The existing land supply (Table 7.1) of 170,000 homes, is ample to meet that LHN figure and is also sufficient to provide for the housing needs of over c400,000 people*.

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This figure (400,000 people) represents an ambition to achieve **additional population growth** of almost **156%** over the baseline growth figure (158,200). Uplifting resident numbers further, by adding the 20,367 homes in green belt, increases that aspiration for **additional population growth** to almost **186%** over the baseline growth figure (158,200).

Even if there is an expectation of lower average household sizes, a backlog of completions, and challenges with the delivery of some sites, the contingency between housing need to meet organic growth and existing land supply provides a large buffer that can more than meet those requirements, along with supporting considerable additional growth. We believe this demonstrates there will be sufficient choice and flexibility of sites to meet the needs of developers and Councils (paragraph 7.12) without releasing green belt.

In addition, the LHN figure represents a challenging level of growth, not only from the perspective of how many dwellings could be completed each year (40% increase on the average annual rate between 2001 and 2020), but such a huge population increase would also result in the need for significant investment in transport infrastructure, additional school places and health service capacity. We do not believe the Plan provides sufficient evidence that these requirements will be met. The impact on carbon emissions as a consequence of this level of growth must also be addressed to achieve sustainable development.

Prior to concluding that the strategy for satisfying housing need requires the release of green belt, we believe further evidence should have been prepared, including:

- The latest iteration of the SHLAAs – given the known timetable, the 2021 SHLAA should have been available prior to the consultation commencing in August 2021.
- Large and medium Windfall Sites, which can be included if based on “*historic windfall delivery rates and expected future trends*” (NPPF paragraph 70). GMCA asserts that their omission is due to a lack of consistent and comparable data on past trends but concedes (paragraph 8.2.4) 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*”. As the Plan should be considered as a whole (verified repeatedly by the GMCA in their responses to Planning Inspector questions), it should have been possible to take such sites into consideration.
- The potential for the over-supply of Office Floorspace (05.01.04, paragraph 7.8) to be repurposed for alternative uses, including housing.
- Specific evidence which confirms that housing density in urban areas is calculated to meet expected levels.

The document confirms (paragraph 7.6, p128) “*it is considered that a cautious approach to predicting delivery rates should be followed in the early years of the plan*”. Yet, rather than adopting a cautious approach to supply, the lack of consideration of all the evidence will lead to the premature release of green belt, leaving many brownfield sites untouched, the amount of previously developed land increasing significantly, creating a focus on green belt development which does not meet either Government or Plan Objectives.

As set out in our original representation (Q27 p23), we welcome the confirmation (Plan p63) that the land at the High Crompton Broad Location will be retained in green belt, until such time that a review of this Plan and/or the Oldham Local Plan can demonstrate that it is necessary. We believe this is an alternative solution that can be adopted in other areas, particularly if there is reluctance to incorporate the evidence we mention above (updated SHLAA, windfall figures, PDR Office to Residential conversions) in the Land Supply figures. At the 5th-year review point, up-to-date SHLAAs would cover the remaining Plan Period and such a review can take into account newly available data. The release of green belt can then be reconsidered following genuine consultation with affected local residents.

This approach would be consistent with the process set out at paragraph 7.7 “*it is considered appropriate to proceed on the basis that we should seek to meet our LHN up to 2037 but to*

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use the process of local plan review to monitor the situation and if necessary to undertake a formal review outside of the statutory timetable”.

With this in mind, we believe the evidence above demonstrates that there is no justification to release land from green belt to satisfy housing need and that all the green belt sites should be removed from the Plan and reconsidered within Local Plans once the most up-to-date information is available.

* Note: this calculation is based on the 2011 average household size for GM (2.38), which results in a lower figure than the 2021 average household size for GM (2.43) and a higher figure than the 2018 Household Projections for the year 2023 (2.34). All the figures demonstrate an exceptionally high buffer of over 140% when comparing LHN to organic population growth.

Word Count: 894

Q4.6. Is there a need to remove land from the Green Belt in each of the seven districts to ensure that the identified need for new homes can be met in accordance with the Plan’s spatial strategy? In particular, is there a need to remove land from the Green Belt in Salford and Wigan to meet housing needs?

We believe the Plan’s spatial strategy should be reconsidered given the Authorities’ declarations of a climate emergency and its importance (NPPF Section 14), together with increasing evidence from ONS in the 2016/2018 household projections (that the growth anticipated in 2014 no longer reflects expectations), and the priorities set out in the GM Strategy.

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 green belt release on irreplaceable habitats, climate mitigation (including increased carbon emissions) and Grade 1, 2 and 3 bmv agricultural land, a climate/environment-focused spatial option 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, but that sustainable passenger and freight transport initiatives should have been prioritised along with other opportunities to mitigate the climate emergency and accelerate nature’s recovery.

The GMCA (06.01.02, Table 4.10) incorporated evidence of the reduction in projected household growth between the anomalous 2014-based household projections and the subsequent ONS projections of 2016 and 2018. The Plan should have taken this evidence into consideration when determining whether an alternative spatial option was necessary. It should be noted that, whilst not available previously, the recent publication of the [2021 Census data](#) verifies that the ONS 2016 and 2018 household projections are closer to the census actuals than the 2014 figures.

With this in mind, we do not believe there is justification for the release of green belt anywhere in GM.

Word Count: 274

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Removing land from the Green Belt to make employment allocations

Q4.7. Is there a need to remove land from the Green Belt to ensure that the identified need for additional industrial and warehousing floorspace can be met between 2021 and 2037?

Please see the response in our representation (p68).

Document 05.01.04 sets out the Assessment of Industrial and Warehousing (I&W) Needs (paragraph 4.18), which starts with the average I&W rates for a previous 16 year period. Despite this reasonable suite of historic data, a weighting adjustment of 3.8% has been applied to account for atypical years. It should be noted that the next 16-year period is likely to have atypical years too, given the Ukraine war and escalating inflation. The Assessment then adds a margin of 31%, which it asserts is “*based on previous studies and external advice provided*”.

Yet, whilst the advice set out in 05.01.02 (paragraph 1.9) states that the past completions approach is based “*on a robust, widely accepted methodology*”, it also confirms (paragraph 1.12) that the uplift added represents “*the upper end of margins*”. In fact, 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, especially given the proposed impact on green belt boundaries, there is an opportunity to significantly reduce the margin applied.

Yet P4E is not content with a margin of 31%. It allocates so much green belt land that the margin rises to over **56%** (and, when including the post Plan developments, the margin hits over **75%**). There is no justification set out in the documentation for this excessive buffer.

In addition, given the lack of committed sustainable transport investment, the possibility for the excess Office Floorspace to be repurposed and the absence of up-to-date land supply data (including an assessment of potential windfall sites), we believe it is premature to release green belt for I&W purposes until all alternatives have been fully explored.

As suggested in the Plan, all I&W sites should be focused near GM’s transport assets (see Point C - Policy JP-J 1). Paragraph 6.36 states “*The Green Belt sites have been selected in order to make the most of key assets and locations, with a focus on realising the potential of transport infrastructure such as the motorway network, the Manchester Ship Canal and Manchester Airport*”. Yet, New Carrington, for example, has only one transport commitment and that is to a new road. There are no committed plans for trams, trains (despite former railway lines in the area) or use of the Manchester Ship Canal (despite its proximity to the site) and no increased bus services for employee travel either). On this basis what evidence is there that that the Policy will “*support environmental objectives by reducing the number of HGV journeys from the ports and distribution parks across England*” (paragraph 6.28)?

There is also no evidence in the current documentation that innovative opportunities to reduce land-take have been considered, including, for example, techniques such as multistorey warehousing or retrofitting older warehouses. We can also find no evidence that (paragraph 6.30) past I&W completions “*have been constrained by a lack of suitable sites within the plan area, resulting in the city-region being unable to compete for some major occupiers.*” and this assertion is not borne out by the number of vacant warehousing sites across GM.

The document 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.

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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.

Word Count: 629

Q4.8. Will the employment allocations removed from the Green Belt promote sustainable patterns of development?

As set out in our response to MIQ 4.4, the Site Selection criteria shows that only 13 of the 34 Allocation sites (that result in the release of green belt) met Criteria 1 (previously developed land/well served by public transport) and, as mentioned in our response to MIQ 3.7, only 3 of the 14 employment sites (that require the release of green belt) meet this requirement but two of these are not well served by public transport, and the third is proposed development on an irreplaceable habitat.

The responses to Planning Inspector questions PQ45, PQ51, PQ53, PQ59, PQ62, PQ65 and PQ70 reveal that many of the transport infrastructure improvements are not considered to be critical to realising the opportunities for large scale development in the Plan. This is of great concern because without investment in sustainable passenger and freight transport options, the employment locations cannot be considered to be promoting “*sustainable patterns of development*”.

New Carrington, for example, has only one commitment in the Transport Delivery Plan (09.01.02), that is for the Carrington Relief Road. All other Transport Opportunities are subject to business cases and developer contributions. In addition, despite the level of increased I&W in the area, there has been no consideration of any sustainable freight transport options (such as using the Manchester Ship Canal or resurrecting the former railway lines to Partington and Carrington).

The list of necessary/strategic transport interventions for New Carrington (09.01.29, Appendix B) include 10 road schemes (4 of which are for major new roads across peatmoss, grade 2 agricultural land, wetland and woodland habitats). The list of necessary/local transport interventions include schemes outside of the allocation area and public transport improvements which we have been informed, in response to our FOI request (attached to our original submission), are not committed.

The site will require employees and business vehicles to travel by road, which will result in significant increases to air, noise and light pollution and carbon emissions.

We mention in our response to MIQ 4.7 that the Plan suggests all I&W sites should be focused near GM’s transport assets (see Point C - Policy JP-J 1). Yet, other than driving up the volume of traffic on the strategic road network, utilisation of these key assets has not been maximised.

We believe the destruction of irreplaceable habitats, the loss of bmv farmland, the impact on climate mitigation opportunities (such as the loss of extensive wetland which currently soaks up local flooding), along with the lack of sustainable passenger and freight transport options means employment development on green belt certainly cannot be described as promoting “*sustainable patterns of development*”.

Word Count: 433

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Total Word Count: 2,729

Kind regards

Marj Powner (Chair)

Friends of Carrington Moss